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STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

INA/043/001

Norman H. Bangerter, Governor
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December 10, 1986

FILE COPY

Ms. Barbara Filas
Summit Minerals, Inc.
221 West 2100 South
Salt Lake City, Utah 84115

Barb.

Dear Ms. Filas:

Re: Initial Completeness Review, Reclamation Permit Application,
Summit Minerals No. 1 Mine (Blackhawk Mine), INA/043/001,
Summit County, Utah

The Division has performed an Initial Completeness Review (ICR) of the Reclamation Permit Application for the above-referenced mine, received November 7, 1986. The application has been found to be incomplete in some areas and to contain some technical deficiencies as well. Specific review comments are attached. An adequate response to the completeness deficiencies will allow the publication period, as specified under UMC 786.11, to commence.

Please feel free to contact myself or Susan C. Linner if you have questions or wish to meet with review team members.

Sincerely,

L. P. Braxton

L. P. Braxton
Administrator
Mineral Resource Development
and Reclamation Program

SCL:jvb
cc: A. Klein
"B" Team
0028R-94

Initial Completeness Review
Reclamation Plan
Summit Minerals Inc.
No. 1 Mine (Blackhawk Mine)
INA/043/001
Summit County, Utah

UMC 771.23 Permit Fees - SCL

There is no evidence that the \$5.00 permit fee has been paid.

UMC 782.13 Identification of Interests - SCL

- (a)(2) Figure 782.13-1 is inadequate to show the proposed permit area. It is difficult to follow the boundary outline. It appears that part of the affected surface area is owned by J. L. Boyer et al. If so ownership and right of access to that portion of the property must be addressed. In any event, the map must be made clearer.

UMC 782.14 Compliance Information - SCL

- (c) This section is not complete. It does not include the termination date of C85-1-1-1, or any discussion on C85-6-2-1.

UMC 782.15 Right of Entry and Operation Information - SCL

This portion of the application must contain a legal description and acreage of the area to be permitted for reclamation.

UMC 782.18 Personal Injury and Property Damage Insurance Information - JRH

The applicant has not provided evidence of liability insurance in the MRP. The applicant must include proof of insurance within the MRP.

UMC 782.19 Other Licenses and Permits - SCL

Although an Air Quality Approval Order is not necessary to undertake reclamation, the applicant is required by state law to minimize fugitive dust. A discussion of measures to be taken to achieve this should be included in the application.

UMC 782.19 Other Licenses and Permits - JRH

Due to minerals rights for sands and gravels which are associated with and within the permit area, the applicant shall provide approval for the use of these materials in conjunction with the reclamation of the operation. Approval by the owner(s) of the minerals rights to the sand and gravel for the use of the materials for reclamation, and, favorable approval regarding the protection of these resources for further development and production is required. A discussion of the uses of these materials in the reclamation of the site and the measures to be taken to protect these resources should be included in the reclamation plan.

UMC 782.21 Newspaper Advertisement and Proof of Publication - SCL

The public notice should show that the application is available for public inspection at Division offices as well as the County Clerk's office. Comments should be directed to Lowell Braxton at the Division.

UMC 783.15 Ground Water Information - RPS

- (a)(4) The permit application should be updated to contain water quality data obtained through 11/86 as part of the Small Operator's Assistance Program (SOAP).
- (b) The application should include the description of the groundwater resource (as applicable) contained in the Final Report for the SOAP program.

The application should propose to conduct a spring seep and spring survey to determine the seasonality of the water sources in the area.

UMC 783.16 Surface Water Information - RPS

- (a) The application should depict the location of all ponds in the general area.
- (b) The application should present the water quality data in a graphical format to depict the seasonal variations for the parameters required by (b)(2)(i) through (vi).

UMC 783.24 - .25 Maps: General Requirements, Cross Sections, Maps, and Plans - JRH

Plate 783.14-4 shows the location and extent of the previously mined workings within the permit area. The applicant shall revise the reference in the index accordingly. This section is considered complete.

Maps and cross sections showing the existing and the proposed reclamation contours do not completely correlate with the reclamation plan. The applicant should identify on the drawings those areas which are to be reclaimed during Phase I and Phase II reclamation. Additional section contours should be provided where applicable to show these phases in the reclamation of the operations.

All diversion structures, culverts or other facilities to remain temporarily or permanently should also be readily identifiable on the maps. This could be accomplished by hatching or shading those respective areas on the contour drawings.

UMC 783.27 Prime Farmland Investigation - JSL

The Soil Conservation Service (SCS) Negative Determination of Prime Farmlands was not submitted as stated on page 783.27-2. The SCS Negative Determination must be included within the plan to determine the submittal complete.

UMC 784.11 Operation Plan: General Requirements - RPS

- (b)(1) The application should discuss the construction requirements and dewatering methods (i.e. manual dewatering only to occur following a 24 hour detention period) for the sedimentation pond.

UMC 784.13 Reclamation Plan: General Requirements - RPS

- (b)(1) The reclamation timetable presented on page RP-5 should include the water monitoring period (required by UMC 817.46) and the final removal/regrading of the sedimentation ponds and associated diversions.
- (b)(3) The application should propose a construction period monitoring program as outlined in the enclosed Guidelines for Water Quality Monitoring.

The applicant must commit to collecting flow data with each water quality sample. The interpretation of variations in quality parameters relative to possible sources/causes of those variations is difficult if not impossible without a flow measurement. It should be noted that ocular methods for this measurement are not acceptable.

The application should commit to submitting all water monitoring data within 90 days of receipt of the sample results [see also UMC 817.52 (b)(1)(iii)]. The commitment should also include results from the NPDES monitoring program.

The application should depict a monitoring point(s) and plan (i.e. frequency, parameters, instrumentation, etc.) for drainage entering the sedimentation pond to demonstrate compliance with UMC 817.46 (u).

UMC 784.13 Reclamation Plan: General Requirements - JRH

- (b)(7) The applicant should provide a contingency plan for the treatment and disposal of acid and toxic forming materials. Due to the scattered and indefinite location of coal spoils and waste materials on the site, the applicant should consider sampling and analysis of the materials at the time of reclamation construction. Composite sampling of the spoil materials during backfilling would identify any potential for acid and toxic materials encountered. As part of the contingency plan for the treatment of these materials, the applicant could commit to providing a minimum of 4 feet rather than the planned 3 feet of cover material to compensate for any deleterious materials encountered, and/or, other specific treatments as would be required to achieve satisfactory reclamation. Such other treatments for these materials shall be approved by the Division upon submittal of the sampling analysis and the specific treatment planned at that time.

UMC 784.16 Reclamation Plan: Ponds, Impoundments, Banks, And, Embankments - RPS

- (b)(1) The application should give the elevation of the dewatering device outlet and the elevation of the proposed maximum sediment volume.

The application should contain a commitment to submit the certification statement required by UMC 817.46 (r) to the Division within 30 days following completion of the sedimentation pond.

General comments - LK

Page 784.13-3 refers to a revegetation plan required by UMC 817.21 - 817.25. This reference should be to a revegetation plan required by UMC 817.111 - 817.117.

The revegetation plan (page 7, Revegetation Appendix) refers to a revegetation map that does not exist. However, the information that needed is found on the Reclaimed Contour map (map 784.23-2).

TECHNICAL DEFICIENCIES

UMC 817.11 Signs and Markers - SCL

This section has not been addressed in the application. Appropriate signs and markers must be placed within the permit area and remain in place during all activities through which they pertain (i.e. through the bond release period).

UMC 817.11 Signs and Markers - RPS

- (e) The application should commit to placement of buffer zone signs as required by this regulation.

UMC 817.133 Postmining Land Use - LK

While the regulations require land owner comments for a change in land use, the applicant will contact the land owner for comments even though the proposed land use is the same as the assumed premining land use. Pending land owner comments, the land use section may require revisions. If the land owner has no adverse comments to the proposed land use, then the plan is adequate with respect to post mining land use.

UMC 817.153 - .163 - .173 Roads: Drainage - RPS

- (a)(3) The application should contain plans for the removal of the bridge and road unless the road is to remain as part of the post-mining land use. If this proposal is made, the applicant must address UMC 817.133 (b)(5) and (6). The applicant is encouraged to contact the Division for guidance in the preparation of this response.

UMC 800 Bonding - JRH

On page RP-4 of the Reclamation Plan Appendix, the applicant states that no cost for the riprap material is included in the bond. Materials costs for riprap will have to be included in the Division's bonding estimate due to the minerals rights on these materials. Mineral rights for the sand and gravel could involve the purchase of the riprap material from the persons owning those rights.

The information provided in the the plan and in the cost estimate is considered to be adequate in order for the Division to determine the bond amount required.