



United States Department of the Interior

OFFICE OF SURFACE MINING
Reclamation and Enforcement
Western Region Office
1999 Broadway, Suite 3320
Denver, CO 80202-3050

August 5, 2014



COMMUNITY DEVELOP.

AUG 11 2014
RECEIVED

CERTIFIED MAIL

Mr. David J. Morris
Pacific Coast Coal Company
John Henry No. 1 Mine
P.O. Box 450
Black Diamond, WA 98010

Re: Review Comments for PCCC's request for minor revision, Plate III-1: Facilities Map; Addition of Non-Coal Waste Area Location.
John Henry No. 1 Mine Permit WA-0007D-R-01
OSMRE Project Tracking Code: WA.WA-0007D.0001
OSMRE ARMS Mail Number: 14/06/17-02)

Dear Mr. Morris:

The Office of Surface Mining Reclamation and Enforcement (OSMRE) has completed its technical review of Pacific Coast Coal Company's (PCCC) John Henry No. 1 Mine, proposed minor permit revision application dated June 12, 2014. The submittal included a revision to Plate III-1 "Facilities Map" to propose a location for a non-coal waste storage area on the John Henry No. 1 Mine.

Please be advised that OSMRE has identified deficiencies in its review of the above cited PCCC submittal. These deficiencies must be addressed before OSMRE may issue an approval of the application under the provisions of the implementing federal regulations applicable to the Surface Mining Control and Reclamation Act of 1977. Please refer to the attached OSMRE Technical Evaluation Report for a detailed listing and discussion of these deficiencies, and what additional information needs to be provided to satisfactorily address them.

If you have any questions concerning this letter or the technical review attached, please contact me at 303-293-5034 or by email at: mhulbert@osmre.gov.

Sincerely,

Matthew Hulbert, Civil Engineer
John Henry No. 1 Mine Project Coordinator (Acting)
OSMRE Western Region

Enclosure

cc: Olympia Office
City of Black Diamond

OSMRE'S JULY 31, 2014, TECHNICAL EVALUATION

PCCC'S JUNE 12, 2013
MINOR REVISION APPLICATION
FACILITIES MAP REVISION

1. **COMPANY:** Pacific Coast Coal Company (PCCC)
2. **MINE/OPERATION:** John Henry No. 1 Mine
3. **TRACKING SYSTEM INFORMATION:**
A. **Mine Information Project Planning System (MIPPS):** WA-0007D.0001
B. **Workload Assignment Tracking System (WATS):**
C. **Administrative Records Management System (ARMS):** 14/06/17-02
D. **Letterhead date of submittal:** June 12, 2014

4. **TYPE OF APPLICATION/DOCUMENT REVIEWED.**

- Permit revision application

5. **EVALUATION.**

Pacific Coast Coal Company (PCCC) submitted a revision to the Approved John Henry No. 1 Mine Permit Application Package (PAP), dated June 12, 2014, in which PCCC proposes the revision of *Plate III-1 Facilities Map*. This revision identifies delineated noncoal waste storage areas per a request made by an OSMRE inspector conducting an inspection on 3/24/2014 and outlined in the Inspection Report dated 4/2/14.

A. **Parts of application reviewed:**

June 12, 2014, submittal including:

A. *Plate III-1 Facilities Map*

(1) Citation of applicable regulations:

30 CFR 780.14	Operation Plan: Maps and Plans
30 CFR 780.38	Support Facilities
30 CFR 816.89	Disposal of Noncoal Mine Wastes
30 CFR 816.181	Support Facilities

(2) Evaluation of compliance with the requirements of the applicable regulations:

- (a) Evaluation of compliance with the permit application requirements (30 CFR Parts 777 through 784):

PCCC proposed the delineated noncoal waste storage areas on *Plate III-1 Facilities Map* to satisfy OSMRE inspection comments outlined in the 4/2/14 Inspection Report. OSMRE deems the proposed PAP revision in accordance with 30 CFR 780.14 and 30 CFR 780.38 as follows:

1. PCCC has revised *Plate III-1 Facilities Map* to include delineated noncoal waste storage areas as follows: Lower Storage Area, Shop Storage Area and Upper Storage Area. In addition to the revised storage areas, there has been the addition of Mud Lake at the southerly portion of the permit boundary. OSMRE concurs that the revised map has been certified by a professional engineer and includes delineated locations of noncoal waste and therefore in accordance with 30 CFR 780.14(b)(5) and (c) and 30 CFR 780.38.

(b) Evaluation of compliance with the performance standards (30 CFR Parts 816 and 817):

PCCC proposed the delineated noncoal waste storage areas on *Plate III-1 Facilities Map* to satisfy OSMRE inspection comments outlined in the 4/2/14 Inspection Report. OSMRE deems the proposed PAP revision is in accordance with 30 CFR 816.89 and 30 CFR 816.181 as follows:

1. PCCC's *Plate III-1 Facilities Map* update includes delineated noncoal waste storage areas including Lower Storage Area, Shop Storage Area and Upper Storage Area. In addition to the proposed storage areas, there has been the addition of Mud Lake at the southerly portion of the permit boundary. These noncoal waste storage areas will facilitate consolidation of waste per an OSMRE Inspection Report dated 4/2/14. The inspector noted that trash located on the John Henry No. 1 Mine site has been placed in areas that impact the environment. PCCC's Approved PAP's *Volume 1 of 5 Chapter III Operation and Reclamation Plan 3.4.10 Noncoal Waste Disposal Plan* indicates that greases, lubricants, paints and flammable liquids will be disposed of through commercial recycling; old mining equipment will be sold or scrapped by local salvage operations; and remaining solid wastes will be disposed of in approved landfills. A Solid Waste Disposal Plan as a condition of the NDPE Permit (WA. 003083-0) further defines PCCC's waste handling obligations and is found in PCCC's Approved PAP's *Volume 1A of 5 Chapter III Operation and Reclamation Plan Appendix III-13*. OSMRE deems the proposed map revision in conjunction with the Approved PAP's waste management practices will prevent damage to the property as well as protect the environment and be in accordance with 30 CFR 816.181. **However, as the Approved PAP does not contain waste storage guidance, PCCC will need to provide an explanation in the PAP as to how placement and storage of waste will not generate leachate and surface runoff that will degrade ground or surface water as well as ensure that waste resulting from mining activities is placed in a controlled stable manner to be in compliance with 816.89(a).**

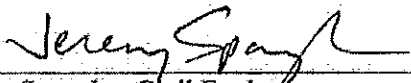
(3) On the basis of the preceding evaluation, I conclude that:

This part of the application/document **does not comply** with the requirements of the applicable regulations. **PCCC must further revise the application according to the bold text above.**

The above evaluation concerns a proposed revision that may affect the reclamation plan that affects reclamation costs. **Mine team leader/mine permit coordinator; please make the team bond cost estimator is aware of this revision so that he or she can determine whether the bond amount needs to be adjusted.**

6. PRIMARY AND PEER REVIEWERS.

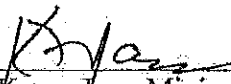
A. Reviewer:



Jeremy Spangler, Civil Engineer
Program Support Division

7-30-14
Date

B. Co-reviewer:



Karen Jass, Mining Engineer
Program Support Division

7/30/14
Date