

January 23, 1981

Memo to Coal File:

RE: Belina 1 and 2  
 Valley Camp of Utah, Inc.  
 ACT/007/001  
 Carbon County, Utah

Date: December 12, 1980  
Time: 3:00 p.m.  
Weather: Sunny, warm, clear  
Company Official: Trevor Whiteside  
State Officials: Joe Helfrich, Sandy Pruitt, Tom Portle  
OSM Official: Gary Fritz

The purpose of this visit was to perform a complete inspection. Also, the new facilities which were being constructed were of interest; these included: (1) pad extension for silo; (2) new bathhouse; (3) water treatment plant; and (4) rebuilt pond.

The following Federal violation was issued at this time:

80-V-15-12  
 P.L. 95-87, Section 502(a), 211.10(c)

Operation without an approved permit.

This violation pertained to the new bathhouse and water treatment plant. This violation was subsequently terminated on December 17, 1980, since these areas were allegedly approved under the USGS 211 plan. Also, on October 3, 1980, Tom Suchoski was informed in writing of Valley Camp's plans as agreed upon on October 2, 1980. These plans were proposed due to inadvertent drainage at the sediment pond into the valley fill resulting in a need to utilize the 2:1 slope from the pad to overlap this area and allow the construction of a compacted fill which would act to seal the area over Valley Camp's subdrain.

#### 717.11 General Obligations

All required maps, plans and authorization letters were available at the minesite.

#### 717.12 Signs and Markers

Signs are posted which access the mine. The signs include the required information.

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#### 717.14 Backfilling and Grading

The slope southeast and above the sediment pond and below the pad has been made into a 2:1 slope. This process involved the removal of the vegetation near the top of the slope to allow for this grade.

Other areas which have been graded include: (1) new parking lot above the sewage treatment facility; (2) the slopes over the tippie area development and (3) the portal extension area.

#### 717.17 Protection of the Hydrologic System

The surface and groundwater monitoring plans along with data were available upon request.

Valley Camp has encountered two faults in their underground workings. Due to the unexpected need to treat this added volume of water, the filtering pond has been overtaxed.

A two section filter pond with two outlet pipes is employed to meet effluent limitations. The mine discharge was fairly turbid in nature. This water had been released in surges which caused water to leave via the emergency discharge pipe rather than passing through a rock filter. This nonfiltered discharge constitutes "discharging without a permit" since it bypasses the treatment system. Apparently this type of a discharge can be avoided if the water is released in a more uniform manner rather than a surge. Mr. Foust and Mr. Whiteside committed to resolving the surge release problem since its basis is management-employee communication.

The discharge was observed by Wayne Hedberg during an on-site meeting on December 8, 1980, and evidence of the discharge (blackened, refrozen snow below the emergency discharge pipe) was observed by this inspector on December 10, 1980.

Photos were taken of both occurrences. No sample was taken of the discharge on December 8, 1980. A sample was taken on December 10, 1980, of the filtered water. The results showed that the filtered water was not in violation. Valley Camp should have reported the bypass discharge to EPA within five days and provided details. Mr. Frenette of Region VIII has been informed of this occurrence.

Valley Camp is attempting to control this water underground and to use flocculents to cut down on TSS before it is discharged since there are space limitations on increasing the size of the Belina filter pond. Also, the possibility exists that the volume of water Valley Camp must control will decrease with time since this is generally true of the groundwater in the area.

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Mr. Whiteside has been informed of this problem and of the Division's intention to treat such a discharge as a violation henceforth. He has also been advised that should filter pond modifications be required, no work is to be done until plans have been submitted and approved.

The sediment pond has been reworked in accord with pad development to solve the above-mentioned leakage problems which have occurred in the past. The pond was stable with no evidence of stress, cracks or structural weakness. Wayne Hedberg indicated in his December 12, 1980, memo that inlet structures were not in compliance and that Mr. Foust had committed to alleviating this problem. This should be checked on the next inspection.

717.20 Topsoil Handling and Revegetation

Topsoil removed from new developments including: (a) the tipple area; (b) the portal extension; (c) the pad extension; (d) the new bathhouse and water treatment facility; has been redistributed. Areas which have received topsoil are: (a) the 2:1 slope southeast and above the sediment pond; (b) slopes which abut the portal extension; (c) slopes above and below the bench cut (old exploration road) located north of the water treatment facility. These areas have been seeded in mid-November.

THOMAS L. PORTLE <sup>TLP</sup>  
RECLAMATION OFFICER

cc: Tom Ehmett, OSM

TLP/btm

Statistics:

See Blackhawk memo dated December 30, 1980.  
IRP G5101020