

July 27, 1981

Inspection Memo
to Coal File:

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

DATE: July 9, 1981
TIME: 1:00 p.m.
WEATHER Cloudy and Cool
COMPANY OFFICIAL: Trevor Whiteside
STATE OFFICIALS: Rex Fidler, David Lof, Tom Portle
ENFORCEMENT ACTION: Issued NOV Group 81-3-11-2. Terminated Violations in Group 81-2-5-2, which were issued June 1, 1981

Compliance With Permanent Performance Standards

771 et al Permits

A letter of approval for the mine was available for inspection at the minesite.

The operator was not in compliance with stipulations and deadlines associated with such stipulations. These stipulations were attached to our approval for Valley Camp to enter in lower O'Connor Seam at the Belina #2. The following State violation was written to apply to this.

NOV #81-3-11-2, No. 1 of 2

Nature of Violation:

Failure to comply with terms and conditions of interim permit (Stipulation 6-81-9).

Provision of Regulation or Permit Violated:

UMC 771.19.

Portion of Operation to Which Notice Applies:

Outlet pipe at mine water discharge filter pond.

Remedial Action:

Repair outlet pipe as required.

Time for Abatement:

Thirty (30) days, no later than 8:00 a.m., August 8, 1981.

Position of the break in the outlet pipe allowed water to be discharged prior to undergoing full treatment, thus short-circuiting the system. This increased the potential for discharge effluent that does not meet the standards.

817.11 Signs and Markers

Signs posted at the mine entrance were complete and adequate. Perimeter markers had been in place in certain areas of the mine at the Belina #2 minesite. However, with the new regulations and guidelines sent to the operators, perimeter markers which were in place were inadequate. Because of this, the following violation was written:

81-3-11-2, No. 2 of 2

Nature of Violation:

Failure to post perimeter markers.

Provision of the Regulation or Permit Violated:

UMC 817.11(d).

Portion of Operation to Which Notice Applies:

Belina disturbed area.

Remedial Action:

Post perimeter markers as required.

Abatement Time:

Thirty (30) days, no later than 8:00 a.m., August 8, 1981.

The operation should be checked on the next inspection to determine if buffer zone markers are adequate. There is no blasting currently in progress. Violation #1 of 2 of Group 81-2-5-2 issued on June 1, 1981, dealt with failure to post topsoil markers on topsoil. At the time of the inspection, a topsoil marker was in place as required. Division inspectors terminated the violation during the inspection.

817.21-.25 Topsoil

Also, in the above-mentioned group, No. 2 of 2, for failure to protect topsoil from wind and water erosion, was addressed properly by the operator enabling Division inspectors to terminate the violation at this time. Topsoil had not been seeded or mulched at that time. Valley Camp is intending to utilize this topsoil in reclamation activities and other portions of the operation this construction season. In the event that this does not occur, Valley Camp is required to seed this area this autumn. Currently there are no signs of erosion at the topsoil stockpile site.

817.41-.52 Hydrologic Balance

Near the substation near Belina #1, a minor runoff problem exists. Runoff from this area is allowed to pond and then freely drain down the embankment to the substation pad area. This has caused a minor amount of erosion and illustrates the potential for more erosion. In addition to this, runoff from the area then ponds at a Class II road which allows Valley Camp to access their topsoil stockpile. If this ponding were to coincide with a large precipitation event, runoff from this area would leave the disturbed area without benefit of treatment. This problem was discussed with Mr. Whiteside on-site. One suggested measure to alleviate this problem would be simply to employ straw bales along the perimeter of this area on the east side and on the south side above Whiskey Creek. This would filter drainage from this area prior to it draining to the road. This ponding problem on the road is discussed under the road section, see 817.150-.176.

Another problem area involved the diesel tank. The location of this diesel tank put it in a precarious position since it is right directly above a reclaimed area. This has been discussed on previous occasions (see past memos dated May 12, 1981 and June 29, 1981). As a temporary measure, Valley Camp previously agreed to putting straw bales to soak up any minor spills to prevent these spills from finding their way to the downslopes and prevegetated areas. This had not been done. The long range plan for this area involves removing these tanks and placing them underground. A stipulation was written to facilitate this in Valley Camp's approval for access into the lower O'Connor Seam (see Stipulation 6-81-2). Inspectors were informed on-site that Valley Camp had previously prepared an SPCC plan. This was viewed on-site. However, nothing specific which would be beneficial in facilitating this tank removal was observed. Valley Camp again indicated their desire to move these tanks as soon as possible during the inspection.

As previously mentioned under permits, Valley Camp had not yet repaired the discharge structure for their mine water discharge treatment pond. Enforcement action was taken according to Stipulation 6-81-9.

817.52 Surface in Ground Water Monitoring

In April 1981, Valley Camp requested and received emergency approval to discharge from their sediment pond. This pond had been designed for complete containment precipitation, the 10-year, 24-hour precipitation event. However, an unusual condition involving a large amount of rainfall which increased snowmelt beyond what would normally occur resulted in more rapid thawing of the pond than was designed. Due to the short period of time of the pond existence and the stability of this occurring again, Valley Camp was requested to and subsequently required to apply for a NPDES permit (see Stipulation 6-81-6). Valley Camp had complied with this request in a June 15, 1981, letter to Mr. Rob Walline, Region V, EPA. At the time of the inspection, they had yet to receive a response from EPA.

Coupled with the approval granted to Valley Camp for an emergency discharge was a requirement to monitor discharge during this emergency situation. Valley Camp complied with this request and did sample. Data was viewed on site by inspectors. Conspicuous of Total Suspended Solids (TSS) data were observed during the inspection. Mr. Whiteside had no explanation as to why TSS was not analyzed. NPDES permit UT-0022985 was available on-site for inspection. This allows Valley Camp to discharge into Eccles Creek and Pleasant Valley Creek and is intended to cover the point source discharge at the mine water treatment discharge pond. Because of the above-mentioned problem with the discharge structure of this pond, the emergency discharge outlet was discharging water at this time. A sample of this was taken and subsequently given to the Department of Health for analysis.

Valley Camp had an approved plan for subsidence monitoring and for surface and ground water hydrology. A letter of approval dated January 30, 1980, was available for inspection at the minesite. When data were viewed on-site, a lack of data for February 1981 and December 1980 was noted by inspectors.

817.61 Use of Explosives

No explosives are currently being used on the minesite.

817.71-.73 Disposal of Underground Development Waste and Excess Spoil and Nonacid and Nontoxic-forming Coal Processing Waste

Just above the sediment pond at the Belina #1 and 2 Mine a substantial amount of spoil material was stored. Much of this material had been obtained in recent grading work which facilitated access to the Belina #2 portal. If Valley Camp does not use it in their fill, it must be transported to a designated disposal area.

817.97 Protection of Fish, Wildlife and Related Environmental Values

Valley Camp had previously performed a cursory inspection of power lines aimed at insuring that raptors were protected from power line contact. This was deemed inadequate by inspectors. Mr. Ed Faust committed to conducting a more expensive survey and submitting a written report by August 15, 1981.

817.111-.114 Revegetation

Valley Camp should be commended on the effort and the diligence in which they have pursued the revegetation program. There is, however, one area, this area being directly south of the Belina #2 opening and the downslope that is crossed by the conveyor belt. This area was not completed, i.e., it had not been shaped to final grade. This area is slated for revegetation this fall.

817.121-.126 Subsidence Control

Valley Camp has an approved subsidence monitoring plan. This involves the Forest Service in that they fly the area, and Valley Camp who has provided monuments for this program. During the inspection, Valley Camp indicated they had not received data from the Forest Service to date. However, they have been given pictures similar to other operations who are required by the Forest Service and Manti-LaSal National Forest to monitor subsidence.

817.150-.176 Roads

A Class III road which allows Valley Camp to gain access to the topsoil stockpile has shown evidence of a ponding problem. This road is directly below the substation and runoff from the substation area coupled with the road creates a potential for a discharge into Whiskey Creek which would be above absolute limitations. In order to remedy this problem, a measure was discussed with Mr. Whiteside during the inspection. It would be impractical to convey water from this area to the sediment pond and there is a lack of space in the general area to develop any type of a catch basin or check dam. The proposed method discussed during the inspection was to reinforce the berm in this area and to have an outlet pipe in the top part of the berm which would empty into area above Whiskey Creek. Water which had emptied into this area would then be filtered through straw bales. This seems an adequate measure to afford a reasonable degree of protection for this area.

THOMAS L. PORTLE ^{TLP}
RECLAMATION OFFICER

cc: Tom Ehmett, OSM
Trevor Whiteside, Valley Camp
Inspection Staff

TLP/btm

Statistics:

See Utah #2 memo dated July 23, 1981
Grant: A & E