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August 3, 1981

6367478

REGISTERED RETURN RECEIPT REQUESTED

ACT/007/0014 ✓
ACT/007/0114

Mr. Trevor Whiteside
Senior Mining Engineer
Valley Camp of Utah, Inc.
P. O. Box 507
Clear Creek, Utah 84517

RE: Areas of Concern
Identified in July 9,
1981, Quarterly
Inspection.

Dear Mr. Whiteside:

As was discussed during the July 9, 1981 inspection for both the Utah No. 2 facility and the Belina #1 and 2 mines, to date, inadequate measures have been taken by Valley Camp, with respect to identifying whether power lines in the area were hazardous to raptors. Ed Faust, engineer for Valley Camp, had done a very general survey in the area. As a result of the inspection, Mr. Faust has committed to presenting the Division with a written report by the 15th of August 1981, to demonstrate Valley Camp's compliance with UMC 817.97.

Other problem areas discussed at the Belina Mine are as follows:

1. Near the substation at the Belina No. 1 Mine, 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 the road which allows Valley Camp to gain access to 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. As you will recall, one measure discussed 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.

Since the road is directly below the substation, runoff from the substation area coupled with the road drainage creates a potential for a discharge into Whiskey Creek, which may exceed effluent limitations. It would be impractical to convey water from this area to the sediment pond because 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 the area above Whiskey Creek. Water, which had emptied into this area, would then be filtered through straw bales. This should afford a reasonable degree of protection for this area.

2. The topsoil storage location was also visited during the inspection. The topsoil had not been seeded or mulched at this time. Valley Camp is intending to utilize this topsoil in reclamation activities and other portions of the operation during this construction season. In the event that this does not occur, Valley Camp is hereby required to seed this area this autumn and to maintain adequate protection for the area.

Several minor problems were in evidence at the Utah No. 2 loadout facility:

1. In an area east and north of the processing facility near the conveyor, a berm was breached. This berm had kept water in a relatively low area from running down the adjacent slope. All water from this area enters the sediment pond, however, some erosion was observed on the downslope from this area.

Possibilities for repair of this area include repairing the berm and doing associated ditch work or dressing up the outlet from the area thus simply conveying water down the eroded slope through a protected channel (i.e. riprap).

2. A need for some work was discovered in an area east of the maintenance shed. In this area, storage containers need to be removed and a berm needs to be employed. These measures are necessary in order to prevent runoff from this material storage area from entering the natural drainage diversion.
3. Also in the above area, a 12-inch culvert of uncertain origin empties into the natural drainage diversion. The Division is concerned that unidentified effluent may enter the natural drainage at this point and hereby directs Valley Camp to

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- A. Identify the point of origin of this culvert and establish the nature of any effluent; or
 - B. Remove or plug this culvert in order to preclude any discharge.
4. There is currently a noncoal waste disposal problem at the Utah No. 2 loadout. Storage barrels, some of which have leaked slightly, can be seen in several locations on the minesite. One area in the southern most part of the operation, materials have been stored for years. There are no current plans for removal of these materials and this is not a permanent waste disposal site. Therefore, Valley Camp should:
- A. Either begin a systematic removal of this material directed at delivering the material to an approved permanent disposal within the permit area or transport such waste to an approved sanitary land fill;
 - b. Request that the area be permitted as a permanent disposal site.

In general noncoal waste is not being handled as required under UMC 817.89. Valley Camp is hereby directed to designate temporary storage site(s) on the mine property and to henceforth store such waste in a controlled manner within the designated area(s).

The Division also hereby acknowledges a phone call on July 20, 1981, indicating that Valley Camp has employed perimeter markers to abate violation 81-3-11-2 #2 of 2.

Sincerely,

h *Climb Feig Not*
JAMES W. SMITH, JR.
COORDINATOR OF MINED
LAND DEVELOPMENT

cc: Inspection Staff

JWS/TLP/vp