

January 12, 1982

Inspection Memo
to Coal File:

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

DATE: December 17, 1981
TIME: 12:15 p.m. - 4:30 p.m.
WEATHER: Clear and Cool
COMPANY OFFICIALS: Trevor Whiteside, Ed Foust
STATE OFFICIALS: Sandy Pruitt, Ken Wyatt
ENFORCEMENT ACTION: NOV 81-2-17-1

Compliance With Permanent Performance Standards

771 et al Permits

The Utah Division of Oil, Gas and Mining granted approval on October 8, 1976, for Valley Camp to operate. Approval for the Belina #2 Mine was given June 10, 1981, with stipulations. All stipulations have been addressed and the results are listed below.

Stipulations on Approval of Belina #2 Mine, June 10, 1981

Stipulation 6-81-1

Valley Camp agreed to obtain an air quality permit for the Belina #2 Mine and comply with conditions of this permit. Permit approval was granted for the Belina #2 Mine August 17, 1981, from the Utah State Division of Environmental Health, Bureau of Air Quality.

Stipulation 6-81-2

This stipulation required Valley Camp to prepare and submit a spill prevention control and countermeasure plan (SPCC). The SPCC plan was submitted to the Division July 6, 1981.

Stipulation 6-81-3

This stipulation required Valley Camp to submit to the Division the designs for their sedimentation ponds as required by the Utah State Division of Water Rights. The original deadline of August 30, 1981, was extended until September 14, 1981. In a letter dated September 11, 1981, Valley Camp of Utah submitted to the Division the required designs of the sedimentation ponds at Belina and Utah mines.

Stipulation 6-81-4

In this stipulation, Valley Camp was required to prepare inlet and discharge structure designs for all culverts within the permit area which do not comply with regulations. The applicant was to submit inventory of all culverts with plans for construction of those culverts which do not comply as well as photographs or as-built plans of existing culverts which do comply. These plans were received on December 20, 1981. They are currently under review.

Stipulation 6-81-5

In this stipulation, the applicant was required to submit plans for disposal of all excess materials generated with snow removal or excavation. The applicant was to designate areas for disposal of this material by September 30, 1981. A letter of September 29, 1981, detailed snow removal procedures for Valley Camp of Utah.

At the time of this inspection, snow was observed being hauled off-site by truck. NOV 81-2-17-1 was issued for failure to operate in accordance with procedures outlined in the above-mentioned letter (See Section 817.71-.73 below).

Stipulation 6-81-6

Valley Camp of Utah was to apply for a NPDES discharge permit for the Belina sedimentation pond by July 30, 1981. A letter to Rob Walline of the Region VIII EPA dated June 15, 1981, requested a NPDES permit for the sedimentation pond as required in this stipulation.

Stipulation 6-81-7

Valley Camp agreed to develop plans for the enlargement and reconstruction of the mine water filter pond and submit plans to the Division of Oil, Gas and Mining and the Division of Environmental Health, Bureau of Water Pollution Control by July 30, 1981. Plans for the mine water discharge filter pond modification were received on July 29, 1981. The State Division of Environmental Health reviewed these plans and required more information. A November 17 reply from Valley Camp was submitted and are currently being review by the Division of Environmental Health.

Stipulation 6-81-8

Valley Camp of Utah was to construct a discharge structure for the inlet culvert of the Belina sedimentation pond by July 30, 1981. On an inspection of August 5, 1981, the inlet culvert was in place with a flexible downspout at the discharge point.

Stipulation 6-81-9

Valley Camp agreed to repair the leak in the outlet pipe located on the mine water filter pond by June 30, 1981. On a July 9, 1981, inspection, the outlet pipe had not been repaired and NOV 81-3-11-2 was issued for failure to comply with terms and conditions of the interim permit (Stipulation 6-81-9). This NOV was terminated on November 2, 1981, effective August 14, 1981.

Stipulation 6-81-10

Valley Camp agreed to complete construction of inlet and outlet structures for the culvert that is adjacent to the conveyor belt on the Belina #1 pad by July 30, 1981. NOV 81-2-10-1 was issued August 7, 1981, for failure to comply with terms and conditions of the permit and failure to minimize erosion to the extent possible. The NOV was terminated August 27, 1981.

817.11 Signs and Markers

The mine entrance sign and perimeter markers were present as required.

817.21-.25 Topsoil

Valley Camp had a small topsoil stockpile but exhausted this resource in a revegetation effort of the slopes surrounding the loadout pad. No new developments have occurred requiring topsoil removal and storage. Valley Camp of Utah, in cooperation with Coastal States Energy Company, have agreed to exchange excess topsoil that was salvaged during the overland conveyor construction at Skyline Mine and the Eccles Canyon Road realignment project. To date, no exchange has occurred, but approval was granted in an August 21, 1981, letter from the Division with three stipulations. These stipulations were addressed in a September 21, 1981, letter to the Division.

817.41-.52 Hydrologic Balance

Runoff from the disturbed area is conveyed by graded pads, ditches and culverts to the sediment pond. Undisturbed drainage is passed below the permit area via culverts and discharged at the base of the sediment pond dam into the natural drainage.

817.52 Surface and Ground Water Monitoring

Valley Camp of Utah has acquired a NPDES permit #UT-0022985. The expiration date is June 30, 1982. A letter requesting renewal was observed dated December 8, 1981. In this letter, it was requested that the NPDES permit cover discharges from the three Utah Mine sediment ponds, the filter pond and the sediment pond at Belina 1 and 2 mines. It was also noted that the two Belina ponds were to receive mine water discharge.

Water quality data were present and examined for compliance. It was found that the September 9, 1981, samples contained Total Suspended Solids of 35 mg/l. This violates the NPDES permit. A letter dated October 16, 1981, to the EPA explained the cause of the problem to be filter disruption at the time of repair. Water monitoring data had been submitted to the Division for the second quarter 1981.

817.61 Use of Explosives

No blasting has been done requiring blasting data and signs posted.

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

The Belina mines are not currently producing underground development waste.

Valley Camp's snow removal procedures calls for storing excess snow generated from snow removal activities on the loadout pad. This snow stockpile shall be spread out in the spring to enhance melting. Any earth or soil materials remaining after snow melt shall be utilized in Valley Camp's road maintenance program.

Waste snow was observed being hauled by truck. Inspectors, accompanied by Mr. Foust, stopped the truck, questioned the driver as to his plans for disposal. He stated that he was dumping the excess snow removed into the Clear Creek strip pit. Due to this, NOV 81-2-17-1 was issued as follows:

Notice of Violation 81-2-17-1

Nature of Violation:

Operating without a permit. Failure to conduct mine operations in accordance with an approved mine plan. Unauthorized disposal of underground development waste outside the permit area.

Provision of the Regulations, Act of Permit Violated:

UCA 1953, 40-10-9(1), UMC 771.19, UMC 817.77(a), Stipulation 6-81-5 of the county lease approval dated June 10, 1981.

Portion of Operation to Which Notice Applies:

The waste material generated from snow removal activity, road and ditch maintenance that has been disposed of at the Clear Creek strip pit.

Remedial Action Required:

Cease waste disposal in the pit until a permit application is approved in accordance with UMC 817.71-.74. Dispose of waste in the area designated in response to Stipulation 6-81-5 of the county lease approval dated June 10, 1981.

Time for Abatement:

No later than December 17, 1981.

817.97 Protection of Fish, Wildlife and Related Environmental Values

In an August 12 letter from Mr. Foust, he stated the power lines in Valley Camp's Utah and Belina mines had two questionable poles in relation to raptor protection. These poles are supposedly located in areas not favorable for perching.

A letter from the Division dated September 2, 1981, suggests that Valley Camp contact the U. S. Fish and Wildlife Service or the Utah Division of Wildlife Resources to request a field determination of the two questionable poles. A letter dated October 9, 1981, from the Fish and Wildlife Service concerning power line configuration at nine coal mining operations did not recommend that Valley Camp modify their poles at this time. A more comprehensive study is to be conducted with results being released by February 1982.

817.100 Contemporaneous Reclamation

The old topsoil stockpile area has supposedly been seeded and reclamation attempted. This area was snow covered hindering confirmation of this fact. Come spring, the area should be checked for germination and also to insure against erosion problems likely with snow melt.

817.111-.117 Revegetation

The slopes around the loadout facility have been seeded. Attempts at revegetation using tree seedlings apparently has failed in this area. Valley Camp intended to obtain topsoil as mentioned previously in this memo to cover these slopes in an effort to enhance revegetation of the slope below the conveyor leading to the loadout.

817.121-.126 Subsidence Control

Subsidence is measured by two methods. Vaughn Hansen, Inc., performs ground surveys and the U. S. Forest Service performs photogrammetric flyovers. Currently, Valley Camp is retreating in the Belina #1 Mine. They do anticipate some subsidence in two areas which measure approximately 280 feet X 1,200 feet. The overburden in this area ranges between 400 and 450 feet thick.

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817.150-.176 Roads

The roads in the Belina Mine area appear to be maintained adequately.

Ken Wyatt
KEN WYATT
RECLAMATION OFFICER

cc: Tom Ehmett, OSM
Trevor Whiteside, Valley Camp of Utah, Inc.
Inspection Staff

KW/btb

Statistics:

See Bear Creek memo dated December 31, 1981
Grant: A & E