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3+7 and plans
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(red book)

VALLEY CAMP OF UTAH, INC.

Scofield Route
Helper, Utah 84526

August 27, 1984

RECEIVED

AUG 28 1984

DIVISION OF OIL
GAS & MINING

D. Wayne Hedberg
Division of Oil, Gas & Mining
4241 State Office Building
Salt Lake City, UT 84114

Re: NOV N84-7-6-1 Abatement Measures

Dear Mr. Hedberg:

Pursuant to your August 15, 1984, letter outlining remedial action acceptable for abatement of Notice of Violation No. N84-7-6-1, the following comments are offered for your consideration.

In your letter you requested a specific response for the first three steps listed. A response numbered correspondingly to those items follows. The remaining items are acceptable and will be complied with.

1. It is our intention to clean the sediment pond such that the stage capacity is equivalent to that proposed by Golder and Associates (see attached figure). The required runoff storage volume from the 10-year 24-hour event is 3.41 acre-feet. Therefore, as illustrated on the attached figure, the elevation of the decant orifice will be set at 8871.5 feet.
2. Before the pond can be cleaned out, the majority of the water must be removed. It is anticipated to pump this water from the pond utilizing a floating intake, maintained to a position at least two feet above the sediment level in the pond, and below the water surface. This discharge will be directed to either the primary discharge pipe or over the embankment into the emergency spillway. The discharge will be passed through straw bales or filter cloth or gel logs, or a combination of all, in hopes of improving water quality. Samples of the discharge will be taken daily and analyzed for TSS as quickly as possible.

At such time as visual inspection or results of analysis indicate non-compliance, the discharge activities will be postponed and the water will then be pumped into water trucks and hauled to one of the sediment ponds at the load-out facility.

At such time when the water has been removed to a level which would allow sediment removal activities to begin, the Division

will be requested to inspect the pond and cleaning operations will then be undertaken.

3. Sediment removed from the pond will be stockpiled in areas A and B shown on the enclosed map, No. C1-0046. Estimates indicate a total of 6.0 acre feet of material could be piled in the two areas without exceeding eight feet in height. Since these two locations already drain back to the sediment pond, additional grading for drainage control will not be necessary. The perimeters of these stockpile areas will, however, be lined with straw and/or hay bales to assist in sediment control. In the event additional area is required to store the sediment, area "C", shown on the map, could be utilized. If this were the case, similar sediment and drainage controls would be insured.

In order to gain access to the center of the pond, three access roads may have to be constructed. General location of these ramps are also shown on the enclosed C1-0046 map.

When pond cleaning activities are over, an evaluation of these access roads for future pond cleaning activities will be made. If these roads would be useful in the future and would not impair the function of the pond, a request will be made of the Division for approval to leave the ramps in place. If they are not considered valuable for future use, they will be reclaimed during cleaning activities.

Once cleaning operations are completed, the pond will be surveyed to determine the new pond capacity.

The original design of the pond, as presented by Golder Associates, was arrived at by calculating a required volume from the design storm (10 year 24 hour) of 6.7 acre feet for runoff, and 3.6 acre feet for sediment volume. This resulted in a total volume requirement of 10.3 acre feet.

In reviewing the Golder information and comparing it with the Vaughn-Hansen Compliance Report, I have found an apparent miscalculation. Using the same formulas as was used by Golder, but changing the required volume of sediment from 3.6 acre feet to 2.75 acre feet (27.5 disturbed acres vs 36.0), and using a new calculated water volume of 3.41 acre feet (as compared to 6.7 acre feet), I come up with a total volume requirement of 6.15 acre feet rather than 10.3 acre feet. Thus, as you can see, the pond as built was considerably oversized.

In consideration of this over-calculation and the amount of sediment we would be required to remove, in order to reestablish volumes as related to the 10.3 figure, I would ask you to consider requiring the removal of only that amount of sediment which would reestablish the sediment water and volumes required from proper sizing. Of course I would remove as much of the sediment as I could while the cleaning operation is in pro-

cess since it would just create added storage. However, I would not expect the Division to require recreation of this additional capacity if it was not required by the regulations.

In my previous assessment of the quantity estimated to be removed, I was assuming a worst case situation, or rather that I would reestablish the total volume based upon a 10.3 acre feet figure. The 6.0 acre feet of sediment estimated previously may be too much if you agree with the recalculation.

Final disposition of any material removed from the pond has not been determined at this time.

Enclosed for your review, please find three copies of Map No. C1-0046.

If you have questions relating to this proposal, please feel free to contact me.

Sincerely,



T. G. Whiteside
Chief Engineer

TGW/lf

Enclosures

cc: Allen Klein, OSM Denver, w/o encl.
Robert Hagen, OSM Albuquerque, w/o encl.

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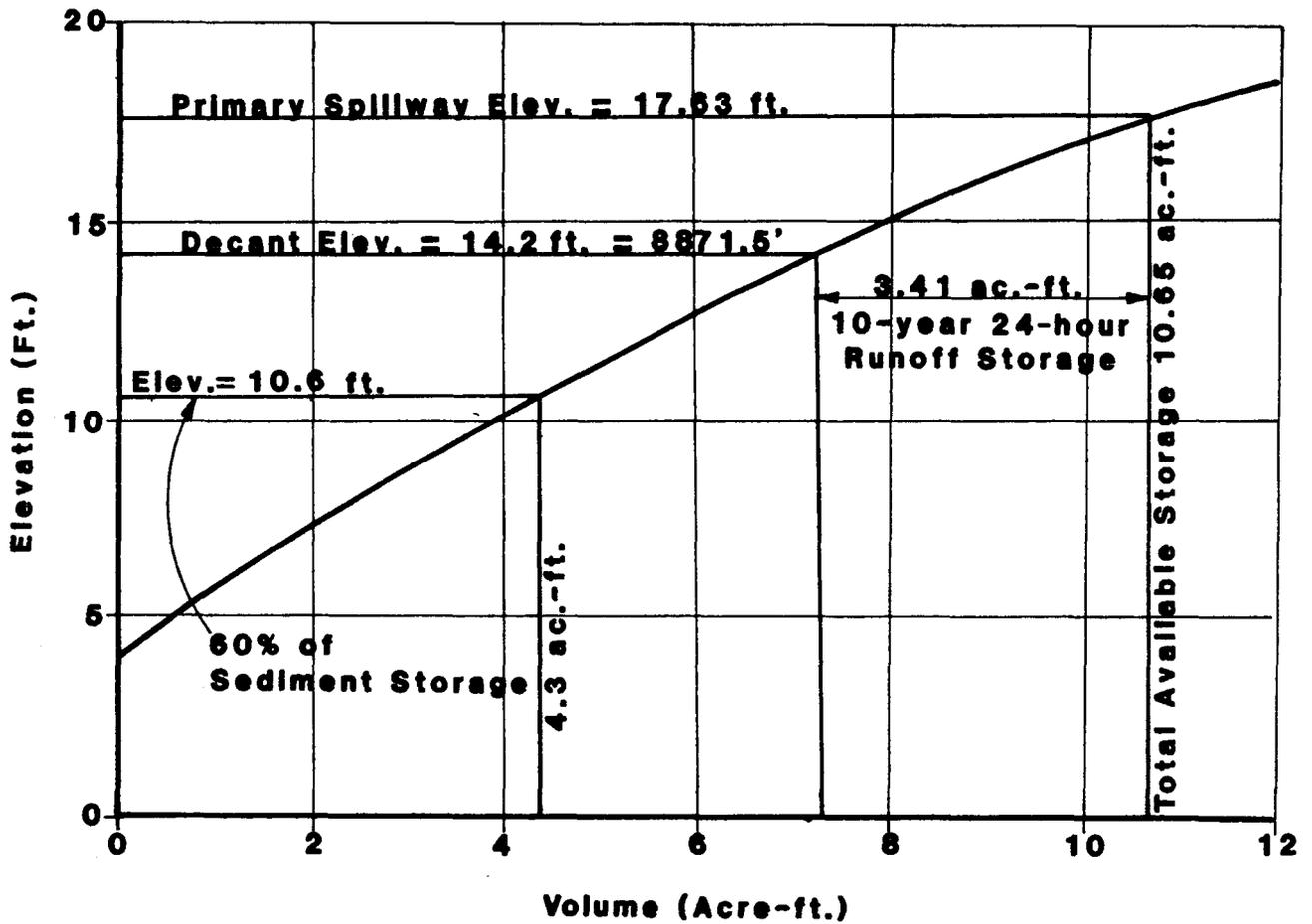


FIGURE 1 STAGE CAPACITY CURVE FOR SEDIMENT POND