



STATE OF UTAH  
NATURAL RESOURCES  
Oil, Gas & Mining

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Temple A. Reynolds, Executive Director  
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4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

July 5, 1984

Mr. Trevor G. Whitesides  
Chief Engineer  
Valley Camp of Utah, Inc.  
Scofield Route  
Helper, Utah 84526

Dear Mr. Whiteside:

RE: Notice of Violation N84-7-6-1, Sediment Pond No. 4, Belina Mine  
Complex, ACT/007/001, Folder No. 3 and 7

The Division's technical staff has reviewed the proposal for abatement of NOV N84-7-6-1 received by the Division from Valley Camp of Utah on June 19, 1984. The Division is concerned that Valley Camp does not completely understand what is required to abate the NOV. As written, Part B of the remedial action required, is not concerned with sediment volume, but rather demonstrating that the sediment pond has adequate volume to contain runoff from the 10-year, 24-hour event. The Division does, however, agree with Valley Camp's commitment to clean out the pond this summer.

The major concern of the Division is the lack of capacity in sediment pond #4 to contain the runoff from the 10-year, 24-hour precipitation event because the sediment pond is being used to contain excess mine water discharge. Sediment pond #4 is not designed to handle mine water discharge plus the 10-year, 24-hour precipitation event. As a result, the potential exists that sediment pond #4 does not provide sufficient detention time to meet effluent limitations on a long term basis (See May, 1984 NPDES monitoring results). Also, if a constant pool is maintained within the pond to handle mine water discharge, coal fines and oils tend to concentrate in the pond. Under such conditions, if the 10-year, 24-hour precipitation event does occur there is no assurance that the water discharged from a constant pool during and immediately after the precipitation event will meet effluent limitations.

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As a result of these concerns the Division requires Valley Camp to:

1. Evaluate the capacity of Sediment Pond #4 to contain runoff from the 10-year, 24-hour precipitation event on an ongoing basis with no discharge.
2. Demonstrate that a theoretical average effluent limitation can be met as a result of a constant mine water pool in the sediment pond and also, as a result of mine water plus the 10-year, 24-hour precipitation event (See methodology similar to Barfield, Warner, and Haan, 1981. Applied Hydrology and Sedimentology for Disturbed Areas, p458-473).

The reason for the Division's concern regarding the pond limitations and potential violations thereof, is the need to protect the aquatic habitat and riparian cultures in downstream locations. While not readily apparent, excess contributions of sediments from the mining operation do have an impact on aquatic habitat downstream, especially to invertebrate organisms in Whiskey Canyon which feed fisheries in Lower Whiskey Canyon and Eccles Creek.

This evaluation will require collection of an undispersed soil sample from the area that would drain into sediment pond #4. It would also require evaluation of inflow and outflow hydrographs, under both steady and variable flow conditions.

In making these evaluations Valley Camp may want to consider the following suggestions:

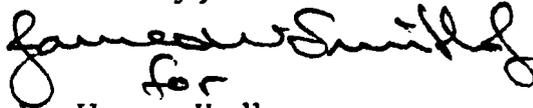
- A. The potential does exist for Valley Camp to construct an underground mine water retention reservoir to supplement the mine water ponds on the surface and allow an alternative location for treatment of excess mine water rather than discharging into sediment pond #4.
- B. If sediment pond #4 must be used as an auxillary treatment and discharge structure for excess mine water, Valley Camp may possibly want to consider modifying the dewatering structure of the pond to allow for automatic dewatering. Such a device consists of a hole in the primary spillway with protection for skimming of oil, grease and coal fines. The hole must be adequately sized to provide adequate detention time, to meet theoretical average effluent concentration for both a steady flow (i.e. mine water only) and variable discharge (i.e. 10-year 24-hour precipitation runoff event plus mine water). The location of the hole in the primary discharging spillway must be

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above the sediment storage elevation, thereby providing a dead pool to prevent agitation and scour, resulting from discharge through the hole. Also, the hole must be located such that there is adequate storage for runoff from the 10-year 24-hour event between the hole and the top of the principle spillway.

The required information must be submitted to the Division no later than July 27, 1984. Should you have any questions please contact me or Tom Suchoski of the review staff.

Sincerely,



for  
D. Wayne Hedberg  
Permit Supervisor/  
Reclamation Hydrologist

DWH/TJS:jvb  
94590-3-5

cc: Allen Klein, OSM, Denver  
Robert Hagen, OSM, Albuquerque  
Larry Dalton, DWR  
Sue Linner, DOGM  
Lynn Kunzler, DOGM  
Tom Suchoski, DOGM  
Joe Helfrich, DOGM  
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Modification of Notice or Order

To the Following Permittee or Operator:

Name Valley Camp of Utah Inc.

Mailing Address Scobell Route, Helper UT 84526

State Permit No. UT/007/001

Utah Coal Mining and Reclamation Act, Section 40-10-1 et. seq., Utah Code Annotated (1953):

Notice of Violation No. N 84-7-6-1 NY / TV dated May 30, 1984, 19 84.

Cessation Order No. C \_\_\_\_\_ / Y / TV dated \_\_\_\_\_, 19 \_\_\_\_\_.

Violation No. 1 is modified as follows: The Abatement Deadline is extended to  
The reason for this modification are as follows: allow Valley Camp to respond to the Division  
Violation No. \_\_\_\_\_ is modified as follows: review (July 5, 1984 letter) of Valley Camp's  
The reasons for this modification are as follows: proposed abatement dated JUNE 14, 1984.  
Violation No. \_\_\_\_\_ is modified as follows:  
The reasons for this modification are as follows:

Date of Service JULY 5, 1984 Kenneth Wyatt  
Signature of Authorized Representative

Time of Service or Mailing 1000 X a.m. \_\_\_\_\_ p.m. Kenneth W. Wyatt #7  
Name and I.D. No.

The New abatement deadline is no later than July 27, 1984  
for submittal of response.