

0007

March 18, 1985

To: Coal File, Inspection and Enforcement Folder  
FROM: Sandy Pruitt, Mining Field Specialist   
RE: Belina Complex, Valley Camp of Utah Inc., ACT/007/001,  
Folder #7, Carbon County, Utah

DATE: February 28, 1985  
TIME: 12:45 p.m. - 5:00 p.m.  
WEATHER: Fair  
COMPANY OFFICIALS: Trevor Whiteside, Steve Tanner  
STATE OFFICIALS: Sandy Pruitt  
ENFORCEMENT ACTION: NOV #N85-2-3-2

Compliance With Permanent Performance Standards

UMC 771 et al Permits

The Division of Oil, Gas and Mining (DOGM) granted a state permit for the Belina Complex on August 24, 1984 in response to the Office of Surface Mining (OSM) permit approval dated July 10, 1984. The permits were accompanied with nine stipulations. Valley Camp's response to five of the stipulations was submitted to DOGM on October 2, 1984. A response to the rest of the stipulations was submitted January 4, 1985. These responses to the permit stipulations are currently under review by DOGM. Several of the responses have been deemed deficient. A list of the deficiencies is being compiled at this time.

In a letter dated December 28, 1984, Valley Camp submitted plans for a 3 inch decant pipe to provide a continuous discharge from the sediment pond. The decant was equipped with a valve in order to slow discharge rates and provide greater detention time if necessary. DOGM listed at several deficiencies in these plans in a letter dated January 18, 1985. Valley Camp's response to the deficiencies was submitted to DOGM on March 6, 1985, and is currently under review.

UMC 817.41 -.46 Hydrologic Balance

Belina Mine

Since Valley Camp does not have DOGM approval of the plans submitted December 28, 1984, for a continuous discharge through the decant pipe, the decant valve was closed during a January 17, 1985 inspection. At the time of this inspection, the sediment pond was

discharging but it was unclear where the discharge was leaving the pond. The decant valve could not be shifted and was apparently frozen. Ice in the sediment pond was up to the level of the oil skimmer and had tilted the stand pipe. It is possible that the corrugated metal stand pipe has been raised off of its foundation at the bottom of the pond and the sediment pond discharge is occurring at this point. Runoff was flowing into the sediment pond at the time of this inspection. The runoff had broken the ice at the pond inlet and flowed under the ice instead of over the ice, which would reduce the detention time in the pond as previously concerned. The rising water level in the pond lifts the ice on the surface and apparently hoists the standpipe up by the oil skimmer. A sample of the sediment pond discharge was obtained during this inspection. The water quality appeared sufficient to meet the settleable solids effluent limitations.

To alleviate this problem with ice accumulations in the sediment pond Valley Camp has considered discharging a limited quantity of mine water, which is 50°F into the pond to melt the ice or to provide for a continuous discharge at the decant pipe level to minimize ice accumulations (there is still a potential for ice to accumulate around the decant pipe and alter the stand pipe). Valley Camp has not provided sufficient information to demonstrate that adequate detention times would be provided and effluent limitations would be met. As mentioned above the continuous decant discharge proposal is presently under review by DOGM.

Valley Camp may also consider several other means to address ice accumulation problems such as replacing the corrugated metal stand pipe with a smooth pipe, as was done by Utah Fuel with a apparent success this year. Installing some sort of agitator, like an air pump or wind mill, in the water around the stand pipe could prevent ice accumulations there. The oil skimmer could be attached to the stand pipe with chains, for example, in such a manner to allow it to be lifted and lowered with the ice without altering the stand pipe. Heat coils on the stand pipe might prevent attachment of any ice to the stand pipe. The discharge structure could be modified to alleviate the stand pipe by installing a pipe in the pond embankment, which is secured with the cement block at the pipe inlet and fitted with a metal plate, bolted to the cement, to function as a baffle at the inlet. This discharge pipe design was implemented in a sediment pond at the Emery Deep Mine. The design is apparently resistant to ice build up damages. These measures would entail additional costs or significant changes to the sediment pond, but this discussion is provided for Valley Camp's consideration of the various options and to promote additional ideas addressing the ice problem.

Thin ice accumulations on the surface of the mine water treatment facility did not appear to significantly impede its design function. No discharge was occurring.

All runoff control measures inspected at the Belina Mine site appeared functionally adequate. Snow storage within the mine area is handled well to minimize off site impacts. A snow storage site above the inlet to the Whiskey Creek bypass culvert may have extended the containment berm. Once the snow clears more Valley Camp should inspect the site and retrieve all snow from the downslope if necessary.

#### Utah Loadout

Due to time restrictions, a thorough inspection of the loadout facility could not be completed. Therefore, particular interest was given to the coal stockpile, loading area and truck scales where a runoff control problems were apparent.

Coastal States Energy's (CSE) railroad spur to the Skyline loading facility passes through Valley Camp's Utah #2 loadout. Runoff from the railroad loadout and pond access road should flow directly to the sediment pond. The lower grade of the CSE spur foundation in between interrupts the drainage so that runoff ponds on the spur foundation and could potentially short circuit the sediment pond inlet, and cause erosion on the down slope or bypass the pond all together. Runoff from the spur foundation past the loadout area was draining back toward the loadout and flowed onto the downslope above the embankment of Sediment Pond #1. This drainage pattern will cause erosion on the downslope and could damage the pond embankment if left uncontrolled. Runoff from the CSE spur foundation, which was loaded with fine sediments, flowed past the sediment pond toward the highway drainage ditch. If the runoff had drained into the loadout sediment pond the additional runoff volumes might have adversely affected the treatment provided by the sediment ponds.

Valley Camp's disturbed area drainage controls away from the spur area were in a poor state of repair. The ditch and berm at the base of the stacker pad and truck dump above the highway were filled in with coal and breached at several points. Disturbed area runoff from the coal stockpile and loading areas had left the disturbed areas, evident by several gullies on the downslope draining into the highway road ditch. Due to the extent that the ditch was filled in with sediment and the erosion on the downslope, it appeared that the drainage control measures had not been maintained for some time, probably not before winter weather set in. NOV #1 of 2, N85-2-3-2 was warranted for the failure to maintain runoff diversions in order to pass all surface drainage from the disturbed area through a sedimentation pond, UMC 817.42(a)(1), UMC 817.45, UCA 40-10-18-2(i)(ii). The remedial action required that Valley Camp reconstruct and maintain the drainage diversion along the base of the stacker pad and truck dump to meet design standards of UMC 817.43 (a) for a ten year, 24 hour precipitation event and UMC 817.43(f)(2) requiring a .3 foot freeboard. Detailed designs of the

disturbed area drainage ditch could not be located in the MRP therefore, in order to ensure that the design standards of UMC 817.43 (a) and (f)(2) are met, Valley Camp needs to provide the designs. Therefore, the remedial action further requires that Valley Camp submit sizing calculations, maps and cross sections of the drainage diversions for DOGM review and approval by April 5, 1985 and to establish the ditch to design by April 5, 1985. As it is likely that winter weather and frozen soil conditions will impede reconstruction of the ditch and berm to the required design standards, an interim measure required that Valley Camp establish drainage controls to divert all disturbed area drainage to a sedimentation pond within two weeks or by March 29, 1985.

Drainage off the trash storage area located near the bottom of the truck grizzly bypassed the inlet to Sediment Pond #2 flowing into the drainage ditch opposite the truck scales. According to the approved designs, this section of the ditch line and runoff from the truck scales, should drain back into the inlet to Sediment Pond #2. Drainage control was to be established such that only a 75 foot section of the egress, to be constructed with a 3 percent grade (or what is specified by UDOT), would drain away from the mine sediment pond. Valley Camp installed rock gabion filters under the direction of DOGM to provide sediment control for the drainage from the 75 foot section of road. The surface grades specified in the approved plans were not established at the time of this inspection. The rock gabion filters were not maintained to function as designed. A sample of the runoff leaving the permit area that was obtained where it flowed out of the gabion filter was black in color and thick with coal fines. At this point, it mixed with highway drainage and then flowed through a series of strawbales that Valley Camp placed in the highway ditch before release directly into Pleasant Valley Creek. A sample of the runoff at this point could not be obtained due to snow. NOV #2 of 3, N85-2-24-3 was issued for the failure to maintain sediment control measures to function in accordance with approved designs, UMC 817.45, UMC 771.19, UCA 40-10-18-2(i)(ii) and drainage control plans for the truck scale installation approved on August 13, 1983 and rock gabion filter designs submitted July 25, 1984. The portions of the operation to which NOV #2 of 2 applies and the remedial actions required for each area are:

- Area A. Drainage from the area at the base of the truck dump bypassing the culvert inlet to Sediment Pond #2. The remedial action required for area A is divert drainage to the sediment pond and maintain diversion as necessary.
- Area B. The truck scale drainage area where adequate surface grades should be established and the ditch line maintained to divert drainage to Sediment Pond #2 as designed so that only drainage of the first 75 feet of the access road flows through the gabion filters. If

Valley Camp is unable to comply with the approved designs, a modification to the approved MRP should be submitted.

Area C. The rock gabion filters along the loadout access road which should be maintained as designed. The sediment backed up before the filters should be removed and straw replaced. The rock filters should be repaired as necessary to insure that the structure is well secured to prevent short circuiting around the rock or straw.

The time for completion of the abatement measures required for Areas A, B, or C, is two weeks or by March 20, 1985.

Discharge data collected twice a month was available for inspection up to January 28, 1985. February field measurements were also available. NPDES submittals are up to date for February.

Surface and Ground water monitoring data was available up to September 26, 1985. Valley Camp is presently responsible for compliance with Stipulation #1 of the permit until a revision is approved or required by DOGM. The 4th quarter water monitoring data was submitted to DOGM On January 30, 1985.

In mine ground water monitoring data was available up to December, 1984. Many of the mine drippers were frozen at that time. Samples were obtained at 1E, entry #1, crosscut #78 and at crosscut #77. According to Stipulation #1, in mine water data should be submitted quarterly with an analysis of the data reported annually.

#### UMC 817.59 Coal Recovery

In a letter dated December 25, 1984, the Bureau of Land Management submitted a notice of noncompliance to Valley Camp for excessive entry widths mined in areas of the West return in the South mains section and in the West return section. While acknowledging that occasional excessive entry widths can occur in mining by mistake or with natural rib deterioration, BLM expressed a concern over the potential loss of recoverable coal reserves. Therefore, BLM required that Valley Camp display a marked improvement in the development of entries and crosscuts at the Belina mine within the next three months.

In follow-up to this notice, I contacted Mr. Allen Vance, Staff Mining Engineer in Price, Utah on March 18, 1985 to determine what his inspection findings were. He informed me that the problem discussed in the December 12, 1984 letter resulted from an error in alignment of the belt entry that necessitated widening the entry for the belt line alignment. There has not been any additional mine development problems within the last three months following that notice.

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UMC 817.121-.126 Subsidence Control

Surface inspections for subsidence monitoring were conducted on October 11, 1984. The results were recently plotted in January 1985. Tension cracks and sink holes were observed above the 2nd panel and near the 3rd left panel. Tension cracks were recorded at about 2-5' deep and 1-2' wide. Sinkholes and numerous tension cracks were observed over 2nd S. Tension cracks were observed over 1st S. These are pillared sections. No subsidence effects were noted above the north mains or the 1st R section with full extraction. There is approximately 200' overburden there. There are not any surface facilities located near areas affected by subsidence.

Mining is currently underway at the 3E mains.

UMC 817.150-.176 Roads

Jack Otani's poor snow removal practices along the Eccles Canyon Road appeared controlled at the time of this inspection. But this is probably due to lack of snow. Trevor Whiteside said that he had mentioned my concerns with Otani's practice of pushing snow and road base into Eccles Creek or cutting away at the road cut slope with Jack Otani and said that Jack's response was not favorable.

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cc: Donna Griffin, OSM  
Trevor Whiteside, Valley Camp  
Joe Helfrich, DOGM  
Sue Linner, DOGM

Statistics: See Wilberg mine memo dated March 7, 1985  
0171Q-15-20