



DEPARTMENT OF HEALTH  
DIVISION OF ENVIRONMENTAL HEALTH

Norman H. Bangarter  
Governor  
Suzanne Dandoy, M.D., M.P.H.  
Executive Director  
Kenneth L. Alkerna  
Director

Bureau of Water Pollution Control  
288 North 1460 West, P.O. Box 16690  
Salt Lake City, Utah 84116-0690  
(801) 538-6146

June 29, 1988

RECEIVED  
JUL 1 1988

DIVISION OF  
OIL, GAS & MINING

Mr. Kit Pappas  
Valley Camp of Utah, Inc.  
Scofield Route  
Helper, Utah 84526

RE: Compliance Sampling Inspection  
Report - UT0022985

Dear Mr. Pappas:

On April 20, 1988 Mike Herkimer and Mary Koltenuk of the Bureau of Water Pollution Control completed a Compliance Sampling Inspection at Valley Camp of Utah, Inc. Enclosed is the inspection report. Please pay particular attention to the Summary of Deficiencies section as the State requests that Valley Camp indicate in writing within 30 days of the date of this letter as to how it has resolved or plans to resolve the deficiencies noted.

If there are any questions please contact Mike Herkimer at 538-6146.

Sincerely,

*Donald A. Hilden*

Donald A. Hilden, Ph.D, Chief  
Industrial Permits and Compliance Section  
Bureau of Water Pollution Control

Attachments

cc: Pauline Afshar, EPA, Region VIII  
Southeastern Utah District Health Department  
Lowell Braxton, Division of Oil, Gas and Mining

MDH:st

1363-21



# NPDES Compliance Inspection Report

Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

## Section A: National Data System Coding

Transaction Code: 1 N 2 5 3 U T 0 0 4 2 2 5 9 8 5 6 1 7 1 8 8 8 9 0 4 10 2 0 11 1 12 8 8 13 0 4 14 2 0 15 1 16 5 17 1 18 5 19 5 20 2 21 2 22 2 23 2 24 2 25 2 26 2 27 2 28 2 29 2 30 2 31 2 32 2 33 2 34 2 35 2 36 2 37 2 38 2 39 2 40 2 41 2 42 2 43 2 44 2 45 2 46 2 47 2 48 2 49 2 50 2 51 2 52 2 53 2 54 2 55 2 56 2 57 2 58 2 59 2 60 2 61 2 62 2 63 2 64 2 65 2 66 2

Remarks

Reserved: 67   68   69   Facility Evaluation Rating: 70   BI: 71 N QA: 72 N Reserved: 73   74   75   76   77   78   79   80  

## Section B: Facility Data

Name and Location of Facility Inspected Valley Camp Scofield Route Helper, Utah 84526		Entry Time <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM 10:45	Permit Effective Date 3/1/88
		Exit Time/Date 12:45 pm	Permit Expiration Date 7/31/92
Name(s) of On-Site Representative(s) Kit Pappas Barry Barnum Steve Tanner		Title(s) Surveyor Coal Salesman Environmental Coordinator	Phone No(s) (801) 448-9420
Name, Address of Responsible Official Mr. Walter L. Wright		Title Vice President - Chief Operating Engineer	Phone No. (801) 448-9420
			Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

## Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

Permit		Flow Measurement		Pretreatment		Operations & Maintenance
Records/Reports		Laboratory		Compliance Schedules		Sudge Disposai
Facility Site Review		Effluent/Receiving Waters		Self-Monitoring Program		Other:

## Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

See Attached Report

Name(s) and Signature(s) of Inspector(s) <i>Michael D. Herkimer</i>	Agency/Office/Telephone Bureau of Water Pollution Control	Date June 9, 1988
Signature of Reviewer <i>Ronald A. Hilden</i>	Agency/Office Bureau of Water Pollution Control	Date June 9, 1988
<b>Regulatory Office Use Only</b>		
Action Taken	Date	Compliance Status <input type="checkbox"/> Noncompliance <input type="checkbox"/> Compliance

## COMPLIANCE SAMPLING INSPECTION

### VALLEY CAMP OF UTAH, INC.

UT0022985

April 20, 1988

#### DESCRIPTION OF THE SYSTEM:

Valley Camp of Utah, Inc. is an underground coal mining operation. It has five discharge points permitted. Discharge points 001, 002 and 003 rarely discharge and if discharge were to occur the effluent would go to Pleasant Valley Creek which is a tributary to the Price River. Discharge points 004 and 005 discharge to Whiskey Canyon Creek which is also tributary to the Price River. Point 004 is intermittent in discharge and point 005 is essentially continuous in discharge. Discharge points 001 through 004 are sedimentation ponds which control and treat surface water runoff. Point 005 is mine water which has gone through a filter pond.

#### CREDENTIALS, PURPOSE AND SCOPE:

Credentials were presented and the purpose and scope of the inspection were explained.

#### NARRATIVE:

Mike Herkimer and Mary Koltenuk of the Bureau of Water Pollution Control completed the inspection checklist with Mr. Steve Tanner, Environmental Coordinator at Valley Camp. After the checksheet was filled out a tour of the facilities was completed.

During the filling out of the checksheet, Mr. Tanner brought up the fact that the 004 discharge point was having trouble meeting total suspended solids limits in the permit during winter months. This was due to the fact that the settling pond froze from the surface to the bottom and short circuiting occurred. To counteract this the company has been using an aluminum hydroxide/aluminum sulfate mixture to help in settling of solids. This product is made by Nalco and is known as Ultrion 7109 coagulant. The application rate was 20 c.c. per minute according to Mr. Tanner. A material safety data sheet (MSDS) was sent to the Bureau of Water Pollution Control by Nalco. The MSDS indicated a 96 hour no observed effect concentration of 4.3 mg/l (no mortality or abnormal effects on rainbow trout).

Also, it should be noted in this section that Bureau of Water Pollution Control monitoring data has indicated violations of total suspended solids limitations at the 005 discharge point on three separate occasions, November 17, 1987, February 18, 1988 and March 29, 1988. None of the discharge monitoring reports (DMR's) submitted by the company indicate any total suspended solids violations.

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Compliance Sampling Inspection  
Valley Camp of Utah

On April 11, 1988 Division of Oil, Gas and Mining (DOGGM) collected a sample from discharge point 004 and analysis indicated a total dissolved solids (TDS) concentration of 1061 mg/l. On May 3, 1988 another sample was taken by DOGM and the TDS at 004 was 740 mg/l. The permit limits TDS to a daily maximum of 700 mg/l with the total amount of TDS discharged from all outfalls limited to one ton (2000 lbs.) per day. Mr. Kit Pappas of Valley Camp called the Bureau of Water Pollution Control on June 7, 1988 and gave the TDS values for the sum of the outfalls. In March he reported 1,286 lbs. per day and in April the value was 821 lbs. per day.

A grab sample was collected on the 005 effluent. The results are shown below:

<u>Parameter</u>	<u>Concentration mg/l</u>	<u>Permit Requirements mg/l</u>
TSS	<3	25
TDS	872	700
Oil & Grease	<5	10
Total Iron	0.11	2.0

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**SUMMARY OF DEFICIENCIES**

**Valley Camp of Utah, Inc.  
Compliance Sampling Inspection**

April 20, 1988

<b><u>Deficiencies</u></b>	<b><u>Required Corrective Action</u></b>
1. Total dissolved solids was approximately 25% over the daily maximum of 700 mg/l.	1. Inform the Bureau of Water Pollution Control of the cause of the high TDS and what actions will be taken to eliminate the problem.
2. Depth control in pond 004 is a problem in the winter months because of icing conditions and the efficiency of the pond decreases causing possible violations of the permit.	2. The permittee under Part III E. of the permit is required to properly operate and maintain treatment facilities in order to achieve compliance with their permit. The use of chemicals if effective is appropriate. Please indicate to the Bureau of Water Pollution Control why chemicals were selected instead of other control measures such as pre-settling within the mine. Also please indicate the application rate of any chemicals being used in the pond, if different than mentioned previously in this report.
3. According to Section II B. of the permit monitoring must be conducted according to 40 CFR Part 136 which has listed the required holding times for each parameter. In order to assure compliance with these holding times the time and date of sampling and analysis must be known.	3. Record the time of analysis for each parameter.
4. Referring to discharge point 004, there shall be no discharge of toxics in toxic amounts as indicated in Utah Administrative Code (UAC) R448-2-7.2.	4. Because Valley Camp is using a known toxic substance at the 004 discharge, it is requested that biomonitoring, as contained in the UPDES permit, be completed when the chemical is being applied. This only needs to be done once providing there is a conclusion of no toxicity. A description of who did the test, test procedures and results should be sent to the Bureau of Water Pollution Control.