

Document Information Form

Mine Number: C007001

File Name: Internal

To: DOGM

From:

Person N/A

Company Valley Camp of Utah

Date Sent: 07/02/1990

Explanation:

Mine Site Evaluation Inspection Report

cc:

File in: C/007, 001, Internal

Refer to:

- Confidential
- Shelf
- Expandable

Date _____ For additional information

**United States Department of the Interior
Office of Surface Mining
Mine Site Evaluation Inspection Report**

26. State Permit Number

27. Date of Inspection
(Y Y M M D D)

0 0 7 / 0 0 1

9 0 0 6 2 0

28. Yes No Do mining and reclamation activities on the site comply with the plans in the permit?
 If no, provide narrative to support this determination.

29. Indicate number of complete and partial inspections conducted by the State to date for this annual review period:

29a. 4 Number of Completes

29b. 5 Number of Partials

30. Indicate number of complete and partial inspections required by the State during this annual review period:

30a. 4 Number of Completes

30b. 8 Number of Partials

31. Has inspection frequency been met?

Yes No

31a. Completes

Yes No

31b. Partials

*As reflected by our
files on 6-28-90*

32. FEDERAL ENFORCEMENT INFORMATION. (Enter violation number. Check appropriate box(es))

Ten-Day Notice No.	Notice of Violation No.	Cessation Order No.	Violation Codes
90-07-001-9			
A <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Authorizations to Operate
B <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Signs and Markers
C <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Backfilling and Grading
D <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Highwall Elimination
E <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Rills and Gullies
F <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Improper Fills
G <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Topsoil Handling
H <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Sediment Ponds
I <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Effluent Limits
J <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Water Monitoring
K <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Buffer Zones
L <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Roads
M <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Dams
N <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Blasting
O <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Revegetation
P <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spoil on the Downslope
Q <input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mining Without Permit
R <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Exceeding Permit Limits
S <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Distance Prohibitions
T <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Toxic Materials
U <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Other Violations

33. Name of Authorized Representative (print or type)

Rudolph H. O'Neill
Signature of Authorized Representative

Date

6-28-90

Signature of Reviewing Official

John C. Kathmann

Date

6/28/90

34. Administrative Information

- a 06.00 Permit Review (Hours)
- b 06.00 Travel Time (Hours)
- c 13.00 Inspection Time (Hours)
- d 05.00 Report Writing Time (Hours)

Valley Camp of Utah
Scofield Route
Helper, Utah 84526

Belina Mine/Val Cam Loadout
Utah Permit No. 007/001

Random Sample Inspection
June 19-20, 1990

Participants:

Rade H. Orell, John Kathmann, Office of Surface Mining Albuquerque Field Office (AFO); John Pappas, Harold Sandbeck, Utah Division of Oil, Gas and Mining (DOG M); and Steve Tanner, Valley Camp of Utah (operator's representative).

Mine Site Evaluation Inspection Report:

The Mine Site Evaluation Inspection report form has been completed to reflect the random sample inspection (RSI). The number 2 is at performance standard code L, to indicate the issuance of Ten-Day Notice 90-02-107-9 (TDN). The TDN is explained in greater detail later in this report.

Introduction:

The inspection commenced the morning of June 19 and terminated the afternoon of June 20. The weather was clear and warm. Ground conditions were dry. A Ricoh 35mm camera and video camera were used to photograph areas of interest. I provided my credentials to the operator's representative at the beginning of the inspection. The last state complete inspection was conducted on April 12, 1990.

Inspection:

The inspection included a records review as well as field observations. We began the inspection with the records review. The issues identified as a result of the inspection are described below:

Records Review:

In preparation for the inspection I reviewed records in DOGM's Salt Lake City Office. The records review at the mine site resulted in the identification of a number of problems that need to be addressed.

1) Certificate of Liability - The certificate of liability maintained at the mine site is a DOGM form signed and notarized by the insurance company. The form indicates the operator is required to maintain liability insurance for the life of the permit. I reviewed the insurance companies form in DOGM's Salt Lake City Office. That form indicates the liability insurance expires on April 1, 1991. The question is what form of proof of insurance is acceptable. The Utah Rules at R614-301-890 address Terms and Conditions for Liability Insurance. The rules require the operator to maintain insurance for the life of the permit and submit a certificate issued by the insurance company. Although the certificate from the insurance company was not available at the mine site I was able to confirm that the operator has met both of the described requirements.

2) Permit - The Valley Camp of Utah Belina Mine permit expired August 24, 1989. DOGM issued the operator a notice of violation for not submitting the permit renewal application within 120 days of the expiration of the permit. The renewal of the permit is still in process. In the interim DOGM issued the operator a "short term" permit. It expires July 5, 1990. The regulatory basis for "short term" permits is not inherently obvious. The information will be relayed to the appropriate program specialist for further review.

3) Maintenance of Records - The records review indicated that many of the records that should be at the mine site were not available at the time of the inspection. For example, the haul road certification, and sediment pond certifications were not available. The records of haul road monitoring per the Mid-Term review stipulation were not available. Certain parts of the mining and reclamation plan (MRP) could not be located. Water monitoring requirements could not be documented although we did review monitoring results. The operator's representative indicated that the records and MRP are in disrepair due to the renewal application that is being prepared. The Utah Rules at R614-400-140, 142, and 143 seem to impart the responsibility to maintain records to the Division rather than the operator.

*In regard to the haul road monitoring the operator indicated that there has not been any because the site has not received any precipitation. This is not consistent with the requirements of the Mid-Term review stipulation at 784.24, October 27, 1987, page 2. A DOGM representative advised me by telephone on June 27, 1990 that the Division intends to issue an NOV for the operator's failure to submit the Annual Report. The Annual Report apparently includes an obligation to submit results of haul road monitoring. The obligation to submit the results of monitoring is somewhat different than failure to monitor. DOGM is including the failure to monitor the road in the NOV for the Annual Report rather than issue a separate notice.

Field Inspection:

The field inspection commenced at the Belina Mine Portals and terminated at the Val Cam Loadout. The inspection of each identified a number of issues that need to be addressed. One of the issues resulted in the issuance of a TDN.

Belina Mine Portal Area:

1) Substation Pad - The inspection of the substation pad indicated that the inlet to an 8 inch culvert that directs flow off the pad to a road ditch and ultimately to Whiskey Creek was partially obstructed. The operator repaired the inlet prior to the end of the inspection. The pad was approved as a Small Area Exemption (SAE) as a result of the last RSI. This inspection indicated that the straw bale sediment trap on the road at the point where drainage enters Whiskey Creek was in need of repair. We observed that the straw bales were silted to the point that earthen material had been deposited on top of the bales. The operator repaired the structure before the end of the inspection. We discussed the problem relative to the LSCI (April 12, 1990). The operator's representative indicated the area was covered with snow at the time of the inspection and that the problem occurred as a result of recent rains. The drainage area for the alternate sediment control practice is relatively small. We observed a small seep flowing across the pad and eventually to the straw bale sediment trap at the time of the inspection. The south outslope of the pad is not well vegetated. If the structure is silting in as rapidly as was implied by the operator's representative DOGM should reevaluate the adequacy of the practice. Additional measures may need to be employed.

2) Diversion Ditches - The inspection of the disturbed runoff diversion ditches on the south and east facing slope indicated the need for maintenance. We observed three locations where maintenance was required. A derelict piece of equipment was parked on the diversion near a shop, the north east end of the diversion was obstructed by storage of roof bolts and timbers, two culverts were partially obstructed by earthen material near the area of roof bolt storage and the extreme north end of the diversion was obstructed by rock and storage of some iron arches. The operator commenced the maintenance work at the time of the inspection.

3) Coal Storage - We observed that coal storage at the mine loadout has encroached on a reclaimed area. A DOGM representative advised me by telephone on June 27, 1990 that the Division intends to issue a NOV for the operators failure to comply with the terms and conditions of the approved permit in accordance with R614-300-143. The approved permit does not identify the area on the reclaimed slope as coal storage. We agreed that the violation occurred since the LSCI.

4) Haul Road - We inspected the haul road outslope toward confirmation of the monitoring stations. We observed one of the 19 sets of stations that are located along the road outslope. Issues with respect to haul road monitoring are described above.

ValCam Loadout:

The inspection of the loadout commenced at the south end and proceeded in a northerly direction. The inspection of this part of the mine also resulted in the identification of a number of issues that need to be addressed.

- 1) We observed two large corrugated steel arches are stored on a small pad. The drainage from the pad exits the area via an undisturbed drainage diversion. The issue was presented to AFO management upon my return to the office. Because the operator simply used the site to store the arches management determined that an action would not be warranted. However, the operator should remove the arches from the site.
- 2) The inlets to sediment pond 003A need to be maintained with respect to erosion.
- 3) The half culvert sediment trap south of the train loadout was in need of maintenance with respect to removal of coal fines at the time of the inspection.
- 4) We observed another questionable practice near the Western Coal Carriers Truck Shop. A small propane tank is sited on top of a berm that prevents disturbed runoff from leaving the site. The operator's representative indicated that the tanks belong to Western Coal Carriers, a contracted trucking company. The Utah Rules at R614-301-742.212 require that siltation structures be constructed before beginning any coal mining and reclamation operations. AFO questioned describing the area occupied by the propane tanks as disturbed and requiring sediment control. AFO management determined that if a more appropriate regulation cite is not available that action would not be warranted.
- *5) We also observed an SAE at the truck entrance to the loadout. The SAE consists of straw bales placed in a ditches at the toe of the approach from the public road. The straw bales treat drainage from the disturbed area. The SAE is located outside the permit boundary. The Utah Rules at R614-300-141 indicate that the permittee will conduct surface coal mining and reclamation operations only on those areas that are specifically designated as the permit area The issue was presented to AFO management. We agreed that a TDN should be issued. Therefore, TDN 90-02-107-9 is being issued from the office via certified mail.
- 6) The inspection of sediment pond 002A included observations of the outlet of a clean water bypass culvert located immediately down stream from the pond embankment. We observed that the culvert was discharging water. The channel bottom was orange in color, possibly indicating the presence of iron. The operator nor the DOGM representatives were aware of any monitoring of the discharge. I contacted a DOGM representative via telephone on June 28, 1990 to

discuss the discharge. He indicated the Division intends to conduct further evaluation of the seep during the next inspection. He also indicated that it is likely related to the abandoned mines located upstream. There are two backfilled portals located in the drainage above the culvert. It is possible that the discharge is from the portals (referred to as Utah No. 2 Mine Portals).

7) We inspected the stockpile of "vegetative support material" located south of pond 001. We advised the operator to ensure that the east facing slope of the stockpile is protected such that erosion does not become a problem. The stockpile has been in place about 1.5 years. It has been seeded. Parts of the east slope are not well vegetated. The material was removed from pond 001, tested and determined to be fair to poor as a plant growth medium.

8) The light use road to pond 001 is in need of some minor maintenance. The operator's representative indicated that the rail road uses the road more than the mine. The representative also indicated that the road will probably be seeded rather than try to maintain it with respect to erosion.

9) The inlet to sediment pond 001 is in need of some minor repair. The inlet is rip rapped, however there is a "nick point" where the channel enters the pond. Erosion of the inlet at the "nick point" is evident. The operator should place additional rip rap to prevent additional erosion.

Close-Out Meeting:

We conducted two close-out meetings. We met with the DOGM representatives first in order to resolve any outstanding issues. We then met with the operator's representative. The meeting was a reiteration of the items listed above. I explained the TDN process to the operator's representative. I indicated that a TDN may be issued pending review by management. The DOGM representative advised the operator's representative that an NOV may be issued for the coal storage on reclaimed area at the mine site.

* Existed at time of LSCI