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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Act/007/001

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September 26, 1997

TO: File
THRU: Daron Haddock, Permit Supervisor *DQH*
FROM: Mike Suflita, Reclamation Hydrologist *MS*
RE: Sediment Removal, Sediment Pond #004A, White Oak Mining & Construction, White Oak Mine #1, ACT/007/001-97B, File #2, Carbon County, Utah

SUMMARY

On September 2, 1997 White Oak submitted an MRP amendment to clean their sediment pond and pump the sediment as a slurry to dispose of the material underground in the lower and now inactive mine. Included in the package was a copy of their letter to MSHA. In past years the sediment was removed from the pond using a dragline and then spread on the pad area above the pond to dry. This year the weather was too wet and they started too late in the year.

TECHNICAL ANALYSIS:

OPERATION PLAN

Sedimentation ponds

Regulatory Reference: R645-301-742.220

Analysis:

The Inspector, Steve Demczak, had informed the Operator in April and again in July of the need to remove sediment from the pond. A site visit on 9/23/97 showed the pond to be about 80% full of sediment and unlikely to accommodate a design event volume. According to the consultant, it has been eight years since the pond was last emptied.

Findings:

The pond definitely needs to have sediment removed to meet regulatory requirements.

Discharges

Regulatory Reference: R645-301-731.510

Analysis:

The submittal shows a map indicating the location in the mine where the slurry would be pumped. However, there is no indication of the elevation of the discharge and no indication of where the discharge might drain.

There is no indication of the land ownership of the discharge point. Although the mine surface facilities are on private land, the leases and potentially the discharge point, are on Forest Service property. The Forest Service has indicated, "For us to consent to disposal of the sediment on the Forest, the company must satisfy the following requirements:

1. Provide laboratory analysis showing that the material is not a hazardous waste or solid waste, as defined by EPA.
2. The analysis must include tests for hydrocarbons and solvents.
3. The analysis must include a description of the waste.
4. The company must describe the potential impacts to the hydrologic system."

Due to past problems, the Division would add to the above requirements that the sediment be tested for boron and selenium. Given that there are between 5,000 and 10,000 cubic yards of material to be disposed of, a minimum of four samples will be appropriate. One of these samples would be a blended sample combining portions from the other three. Sample sites should be separated as far as possible to be representative.

The submittal did contain a lab analysis for one sediment sample and the parameters were within acceptable limits. It will be necessary, however, to expand the testing as outlined above. The EPA testing cited above includes a standardized leach test.

Although there is a letter to MSHA, there is no indication that MSHA approval for the operation has been received.

Page 3
ACT/007/001-97B
September 26, 1997

Findings:

The requirements of R645-301-731.510 have not been met. The present form of the amendment does not contain sufficient information for the Division to evaluate the proposal. The Operator must provide the information indicated above namely, land ownership information, sediment testing, MSHA approval, and demonstration of potential impacts to the hydrologic regime.

RECOMMENDATION:

Prior to approval, the requirements of R645-301-731.510 must be provided as described above.

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cc: Joe Helfrich
Bob Davidson
Steve Demczak
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