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STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

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April 25, 1985

Mr. Kenneth Alkema
Department of Health
Division of Environmental Health
State Office Building
Salt Lake City, Utah 84114

Dear Mr. Alkema:

RE: Comments on requested overflow bypass, Skyline Mine Complex,
Utah Fuel Company, ACT/007/005, Carbon County, Utah

The Division has received a copy of a letter from Mr. Vernal J. Mortenson of Coastal States Energy to Mr. Steve McNeal of your staff requesting permission to use the emergency provisions in their NPDES permit to allow overflow bypass of waters held in the sediment pond at the Skyline Mine during the period of spring runoff.

The Division has two concerns regarding Utah Fuel's emergency by-pass request. First, what constitutes an emergency condition? Based on the Division's review of the proposal, the integrity of the structure is not at risk. The capability of the pond to pass the seasonal snowmelt runoff and the normal mine water discharges and still meet effluent limitations appears to be the main concern.

The Division has an additional concern regarding the design criteria of the pond. As required under UMC 817.46, a sediment pond must be designed to provide the storage capability for the 10 year-24 hour runoff volume or equivalent snowmelt volume. It is the Division's position that the water level in the pond must be maintained at an elevation to allow the 10 year-24 hour precipitation runoff volume to be contained without discharge.

Under the present mine plan approval, the Skyline sediment pond is designed as a total containment facility for the 10-year 24-hour runoff event and a minor volume of mine water discharge. As a result of significant increases in underground mine water inflows from the amount originally anticipated, Utah Fuel is proposing changes in the method of handling this excess mine water. Consequently, the presently approved operating plan for the pond will not be followed, which could place the Division's previous approval in jeopardy. Coastal States is providing data that address

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volumetric capacity of the pond in light of increased mine water discharge. These data have not been reviewed by the Division at this time. The Division is concerned that Utah Fuel's "Emergency request" may become a standard operating practice that may result in unacceptable turbidity in downstream surface water.

The Division would request that State Health incorporate these concerns into the review of the emergency overflow by-pass request. If you do not feel it is appropriate for your agency to raise these concerns, please request the company to address these concerns with the Division.

Best regards,

D. Wayne Hedberg
for

Dianne R. Nielson
Director

TJS:jvb

cc: L. Braxton

W. Hedberg

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