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

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August 23, 2001

Dan Meadors, General Manager  
Canyon Fuel Company, LLC  
HC 35 Box 380  
Helper, UT 84526

Re: Slurry Pumping Underground, Canyon Fuel Company, LLC, Skyline Mine, C/007/005-AM01D, Outgoing File

Dear Mr. Meadors:

The above-referenced amendment has been reviewed. There is a deficiency that must be adequately addressed prior to approval. A copy of our Technical Analysis is enclosed for your information. In order for us to continue to process your application, please respond to this deficiency by September 21, 2001.

If you have any questions, please call me at (801) 538-5325 or Mike Suflita at (801) 538-5259.

Sincerely,

A handwritten signature in cursive script that reads "Daron R. Haddock".

Daron R. Haddock  
Permit Supervisor

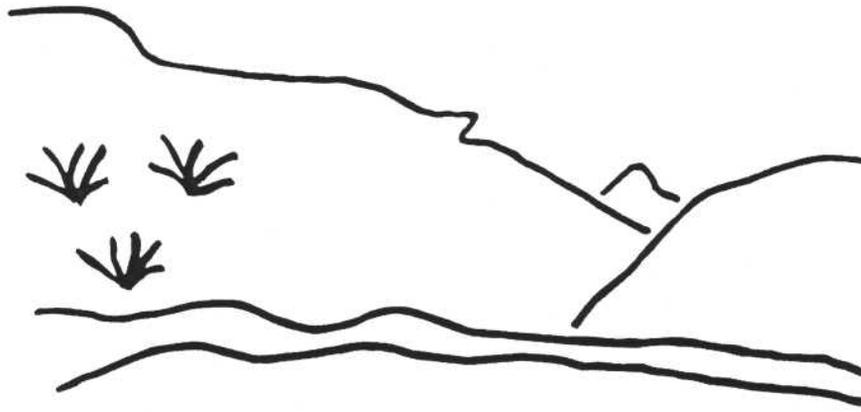
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Enclosure:

cc: Price Field Office

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# State of Utah



## Utah Oil Gas and Mining

### Coal Regulatory Program

Skyline Mine  
Slurry Pumping Underground  
C/007/005-AM01D  
Technical Analysis  
August 23, 2001

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**INTRODUCTION**

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**TECHNICAL ANALYSIS****INTRODUCTION**

On June 22, 2001, the Division received amendment AM01D. The amendment is to change the routing of conveyor washdown water and coal fines from going to the sediment pond to being routed underground. This Technical Memo is a review of the Hydrologic aspects of that submittal. There are deficiencies.

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August 23, 2001

## INTRODUCTION

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OPERATION PLAN

## OPERATION PLAN

### HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 784.14, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-301-512, -301-513, -301-514, -301-515, -301-532, -301-533, -301-542, -301-723, -301-724, -301-725, -301-726, -301-728, -301-729, -301-731, -301-733, -301-742, -301-743, -301-750, -301-751, -301-760, -301-761.

#### Analysis

The Utah Coal Rules require the following:

- 731.500. Discharges.
- 731.510. Discharges into an underground mine.
- 731.511. Discharges into an underground mine are prohibited, unless specifically approved by the Division after a demonstration that the discharge will:
  - 731.511.1. Minimize disturbance to the hydrologic balance on the permit area, prevent material damage outside the permit area and otherwise eliminate public hazards resulting from coal mining and reclamation operations;
  - 731.511.2. Not result in a violation of applicable water quality standards or effluent limitations;
  - 731.511.3. Be at a known rate and quality which will meet the effluent limitations of R645-301-751 for pH and total suspended solids, except that the pH and total suspended solids limitations may be exceeded, if approved by the Division; and
  - 731.511.4. Meet with the approval of MSHA.
- 731.512. Discharges will be limited to the following:
  - 731.512.1. Water;
  - 731.512.2. Coal processing waste;

As a regular part of the operation, the coal conveyor areas are washed down with water to prevent coal dust buildup. This washdown keeps the dust from accumulating and becoming a fire hazard. Three buildings have existing sumps that collect the dust-laden washdown water. Buildings BC-4 and BC-20, on the upper bench, and the Crusher Building, on the lower bench, all have the same type system. The water that overflows from the sumps drains to the sediment pond where the coal fines settle out. These coal fines account for an estimated 90 % of the sediment pond loading. The material cleaned out from the sed pond is about 90 % coal and has about 8,400 BTU per pound. The material is blended back into regular coal product for sale from the mine.

This amendment proposes to revise all three systems to pump the sump water, along with some of the coal fines, back underground. After initial settling of the coarse coal fines, the water would be pumped out of the sumps for two to three hours each day. An estimated 4,200 to 6,300 gallons would be pumped each day. The water from the Crusher Building would be pumped to an underground sump in Mine No. 3, Level 3 where the fines will settle out and the clarified water becomes part of the underground water handling system. The water from BC-4 and BC-20 would be pumped to Mine No. 3, Level 2 where again, the fines would settle out and the clarified water becomes part of the underground water handling system. In this latter case the sump would be to the recently constructed 54 million gallon sump in 15L and 16L. Water samples will be taken weekly to ensure compliance with UPDES permit requirements.

This proposed amendment would improve the sediment pond performance by reducing the sediment load substantially. There are, however, several clarifications that must be made before approval can be granted. 1) How often will the pumping occur in terms of days per week? This is needed to obtain and estimate of total water volumes returned to the underground hydrologic system. 2) What is the source of the washdown water? This is needed to determine if any contaminants might be introduced to the hydrologic system. 3) How will the water be conveyed underground? For example, by pipeline or some other method. This is needed to determine that no other contaminants will be taken underground.

The Coal Rules require that discharges into an underground mine, "Meet with the approval of MSHA". No evidence of such approval was included with the submittal. This will have to be provided. The Coal Rules also limit discharges to, among other things, water and coal processing waste and this proposed action conforms to those limitations.

## Findings

Information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Prior to approval, the Permittee must provide the following in accordance with:

- R645-301-731.500**, 1) Provide the three additional information requests listed above to completely evaluate the proposed action. 2) Provide evidence of MSHA approval of the proposed action.