

# TECHNICAL MEMORANDUM

## Utah Coal Regulatory Program

#3356  
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September 16, 2009

TO: Internal File

THRU: Priscilla Burton, Environmental Scientist III, Soils, Team Lead *PWB/MS*

FROM: James D. Smith, Environmental Scientist III, Hydrology *DS/17/09*

RE: Midterm Permit Review, Canyon Fuel Company, LLC, Skyline Mine, C/007/0005, Task ID # 3356

**SUMMARY:**

The Division initiated a mid-term review of the Skyline Mine permit on July 21, 2009. The Division conducted a technical site visit, in conjunction with the assigned compliance inspector, on August 25, to document the status and effectiveness of operational, reclamation, and contemporaneous reclamation practices. Included in the items chosen for review was a review of the applicable portions of the permit to ensure that the mine plan contains commitments for application of the best technology currently available (BTCA) to prevent additional contributions of suspended solids to stream flows outside of the permit area.

**TECHNICAL ANALYSIS:****OPERATION PLAN****HYDROLOGIC INFORMATION**

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

**Analysis:****Sediment Control Measures**

In Section 3.2.12, the Permittee describes 42 areas that do not report to sedimentation ponds. Straw bales, silt fences, straw dikes, excelsior mats, paving, vegetation, and similar

methods provide sediment control: many of these sites are identified as "Special Exempt Areas". One small area drains into the Mine #3 portal.

Drawings 3.2.1-1, 3.2.1-3, and 3.2.8-2 show the locations of the ASCAs and Exempt Areas. Section 20 of Volume 5 contains designs for ASCA sediment control treatments.

#### **Siltation Structures: Sedimentation Ponds**

Sedimentation ponds are the only Siltation Structures at the Skyline Mine. Design and operation of the sedimentation ponds are discussed in Section 3.2, with additional information in several other sections of the MRP.

The largest pond treats runoff from the main mine site in Eccles canyon. Water is discharged to Eccles Creek under UPDES permit UT0023540. This is outfall -001. The pond discharges through a riser equipped with an oil skimmer, but discharge from the mine is piped directly into the riser.

Outfall -002 is at the sedimentation pond at the Loadout (at the confluence of Eccles and Mud Creeks) and outfall -003 is at the pond at the Waste Rock Disposal Site.

#### **Siltation Structures: Other Treatment Facilities**

There is no Other Treatment Facility at the Skyline Mine.

#### **Siltation Structures: Exemptions**

Several of the ASCAs described on pages 3-64 thru 3-72(b) are designated as "Special Exempt Areas". These include sedimentation-pond outslopes, paved approaches from public roads, and revegetated areas.

#### **Finding:**

The mine plan contains commitments for application of the BTCA to prevent additional contributions of suspended solids to stream flows outside of the permit area.

#### **RECOMMENDATION:**

Approval of the midterm review is recommended.