

Skyline Mine

Gregg A. Galecki, Environmental Engineer
HC35, Box 380
Helper, Utah 84526
(435) 448-2636
Fax (435) 448-2632

June 23, 2016

Mr. Ken Hoffman, P.E.
Permits and Compliance Section
Department of Environmental Quality
Division of Water Quality
288 North 1460 West
Salt Lake City, Utah 84114-4870



RE: Noncompliance Follow up, Canyon Fuel Company, LLC., Skyline Mine, UPDES Permit UT0023540

Mr. Hoffman:

The following is intended to provide you additional information on work that was conducted following the noncompliance issue that occurred on May 18, 2016. Included in this letter are the water quality laboratory analysis for six (6) samples collected following the discharge, correspondence with both Division of Wildlife (DWR) and Division of Oil, Gas, and Mining (DOG M) personnel, and an internal memo from the Skyline Mine General Manager outlining additional procedures that are implemented to eliminate any future similar discharges.

A total of six (6) water quality samples were collected from immediately following the increased-iron water discharge through the following day. Attached analysis E.Creek S. Fork (5/18/16 @ 14:20, and VC-6 (5/18/16 @ 20:00, and 5/19/16 @ 11:00) were collected at the same location and best illustrate the impact of the event. E.Creek S.Fork showed concentrations of total iron (3.11 mg/l) and total suspended solids (45 mg/l) approximately 20-minutes following the discharge. Site VC-6 was collected approximately six (6) hours later had a total iron (T-Fe) concentration of 0.78 mg/l and a total suspended solids (TSS) concentration of 23 mg/l. As an indication of the background concentrations in the stream, site VC-11 collected in Eccles Creek upstream of the Mine site on May 18 @ 18:30 had a total iron concentration of 0.73 mg/l and total suspended solids of 39 mg/l; indicating that the increased iron was a short-term occurrence. Another sample collected at VC-6 on 5/19 showed concentrations of T-Fe at 0.59 mg/l and TSS at 23 mg/l. Additionally, a sample collected downstream at Mud Creek, upstream of the confluence with Eccles Creek on May 18 had concentrations of T-Fe at 3.95 mg/l and TSS at 533 mg/l indicating the short-duration event had no impact to the receiving waters downstream.

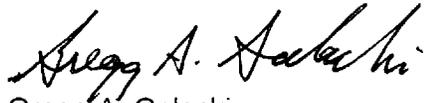
Visual observations indicated the iron that was suspended in the release dissipated approximately 0.6-0.7 miles downstream of the Mine. No staining of the rocks or accumulation in the vegetation or shallow pools occurred. Visual observations of the creek continued for five (5) days, looking for signs of impacts to wildlife; no impacts were noted. DOGM biologists initially had concerns about impacts to the macroinvertebrates, so mine personnel provided a written outline identifying the minimal potential for impacts (skyline abatement memo) that was shared with both DWR and DOGM personnel. The attached email correspondence (DWR-DOGM concurrence) demonstrates the concurrence that there is no additional wildlife follow up necessary with the event.

Lastly, following a thorough internal review of the event General Manager Corey Heaps has implemented new procedures for handling increased discharges at the mine to eliminate the probability of having a similar occurrence (Increased Water Flow...).



It is our belief that this matter is now closed. If you have any questions or require additional information, please contact me at (435) 448-2636, or Craig Brown – Engineering Manager at (435) 448-2643.

Sincerely:



Gregg A. Galecki
Canyon Fuel Company, LLC.
Environmental Engineer – Skyline Mines

Attachments: water quality lab analysis, Procedure for maintaining Iron discharge compliance

Cc: Corey Heaps – CFC (email)
Craig Brown – CFC (email)
Chris Hansen – CFC (email)
Kim Shelly – DWQ (email)



Analysis Report

June 01, 2016

CANYON FUEL SKYLINE MINES
HCR 35 BOX 380
ACCOUNTS PAYABLE
HELPER UT 84526

Page 1 of 2

Client Sample ID: E. CREEK S. FORK
Date Sampled: May 18, 2016
Date Received: May 19, 2016
Product Description: WATER

Sample ID By: Skyline Mine
Sample Taken At: E. CREEK S. FORK
Sample Taken By: GG
Time Sampled: 1420
Time Received: 1420
Mine: 21
Field - pH: 8.81 pH
Field - Conductivity: 814 umhos/cm
Field - Temperature: 11 Deg. C

Comments: Dissolved Metals Field Filtered

SGS Minerals Sample ID: 782-1636561-004

Table with columns: TESTS, RESULT, UNIT, METHOD, REPORTING LIMIT, ANALYZED DATE, TIME, ANALYST. Rows include Hardness, Anions, Balance, Cations, Oil and Grease, Alkalinity, Bicarbonate Alkalinity, Carbonate Alkalinity, Total Dissolved Solids, Total Suspended Solids, Nitrate + Nitrite as Nitrogen, Chloride, Sulfate, Phosphorus, and METALS BY ICP (Calcium, Iron, Magnesium, Manganese).

Handwritten signature of Domenic Ibanez

Lab Supervisor

Domenic Ibanez
Lab Supervisor

SGS North America Inc. Minerals Services Division
2035 North Airport Road Huntington UT 84528 t (435) 653-2311 f (435)-653-2436 www.sgs.com/minerals

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Analysis Report

June 01, 2016

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Page 2 of 2

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Table with columns: TESTS, RESULT, UNIT, METHOD, REPORTING LIMIT, DATE, ANALYZED TIME, ANALYST. Rows include METALS BY ICP (continued), Potassium, K - Dissolved, and Sodium, Na - Dissolved.

Handwritten signature of Domenic Ibanez

Lab Supervisor

Domenic Ibanez
Lab Supervisor

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Analysis Report

June 01, 2016

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HCR 35 BOX 380
ACCOUNTS PAYABLE
HELPER UT 84526

Page 1 of 2

Client Sample ID: CS-11
Date Sampled: May 18, 2016
Date Received: May 19, 2016
Product Description: WATER

Sample ID By: Skyline Mine
Sample Taken At: CS-11
Sample Taken By: GG
Time Sampled: 1830
Time Received: 1420
Mine: 21
Site: 10
Field - pH: 8.54 pH
Field - Flow: 792.16 GPM
Field - Conductivity: 432 umhos/cm
Field - Temperature: 3.9 Deg. C

Comments: Dissolved Metals Field Filtered

SGS Minerals Sample ID: 782-1636561-001

Table with columns: TESTS, RESULT, UNIT, METHOD, REPORTING LIMIT, DATE, ANALYZED TIME, ANALYST. Rows include Hardness, Anions, Balance, Cations, Oil and Grease, Alkalinity, Bicarbonate Alkalinity, Carbonate Alkalinity, Total Dissolved Solids, Total Suspended Solids, Nitrate + Nitrite as Nitrogen, Chloride, Sulfate, Phosphorus, and METALS BY ICP (Calcium, Iron).

Handwritten signature of Lab Supervisor

Domenic Ibanez
Lab Supervisor

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HCR 35 BOX 380
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HELPER UT 84526

Page 2 of 2

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Field - Conductivity: 432 umhos/cm
Field - Temperature: 3.9 Deg. C

Comments: Dissolved Metals Field Filtered

SGS Minerals Sample ID: 782-1636561-001

Table with 8 columns: TESTS, RESULT, UNIT, METHOD, REPORTING LIMIT, DATE, ANALYZED TIME, ANALYST. Rows include Magnesium, Manganese, Potassium, and Sodium.

Handwritten signature of Domenic Ibanez

Lab Supervisor

Domenic Ibanez
Lab Supervisor

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Analysis Report

June 01, 2016

CANYON FUEL SKYLINE MINES
HCR 35 BOX 380
ACCOUNTS PAYABLE
HELPER UT 84526

Page 1 of 2

Client Sample ID: MUD CREEK UP FROM ECCLE
Date Sampled: May 18, 2016
Date Received: May 19, 2016
Product Description: WATER

Sample ID By: Skyline Mine
Sample Taken At: MUD CREEK UP FROM ECCLES
Sample Taken By: GG
Time Sampled: 1915
Time Received: 1420
Mine: 21
Field - pH: 7.2 pH
Field - Flow: 7776.8 GPM
Field - Conductivity: 341 umhos/cm
Field - Temperature: 7.2 Deg. C

Comments: Dissolved Metals Field Filtered

SGS Minerals Sample ID: 782-1636561-002

Table with columns: TESTS, RESULT, UNIT, METHOD, REPORTING LIMIT, DATE, ANALYZED TIME, ANALYST. Rows include Hardness, Anions, Balance, Cations, Alkalinity, Bicarbonate Alkalinity, Carbonate Alkalinity, Total Dissolved Solids, Total Suspended Solids, Nitrate + Nitrite as Nitrogen, Chloride, Sulfate, Phosphorus, and METALS BY ICP (Calcium, Iron, Magnesium, Manganese).

Handwritten signature and printed name: Lab Supervisor, Domenic Ibanez, Lab Supervisor

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HELPER UT 84526

Page 2 of 2

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Field - Flow: 7776.8 GPM
Field - Conductivity: 341 umhos/cm
Field - Temperature: 7.2 Deg. C

Comments: Dissolved Metals Field Filtered

SGS Minerals Sample ID: 782-1636561-002

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Handwritten signature of Domenic Ibanez

Lab Supervisor
Domenic Ibanez
Lab Supervisor

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Analysis Report

June 01, 2016

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HCR 35 BOX 380
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HELPER UT 84526

Page 1 of 2

Client Sample ID: VC-6
Date Sampled: May 18, 2016
Date Received: May 19, 2016
Product Description: WATER

Sample ID By: Skyline Mine
Sample Taken At: VC-6
Sample Taken By: GG
Time Sampled: 2000
Time Received: 1420
Mine: 21
Site: 15
Field - pH: 8.77 pH
Field - Flow: 3208 GPM
Field - Conductivity: 587 umhos/cm
Field - Temperature: 10.1 Deg. C

Comments: Dissolved Metals Field Filtered

SGS Minerals Sample ID: 782-1636561-003

Table with columns: TESTS, RESULT, UNIT, METHOD, REPORTING LIMIT, DATE, ANALYZED TIME, ANALYST. Rows include Hardness, Anions, Balance, Cations, Alkalinity, Bicarbonate Alkalinity, Carbonate Alkalinity, Total Dissolved Solids, Total Suspended Solids, Nitrate + Nitrite as Nitrogen, Chloride, Sulfate, Phosphorus, and METALS BY ICP (Calcium, Iron, Magnesium).

Handwritten signature of Domenic Ibanez

Lab Supervisor

Domenic Ibanez
Lab Supervisor

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Page 2 of 2

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Time Sampled: 2000
Time Received: 1420
Mine: 21
Site: 15
Field - pH: 8.77 pH
Field - Flow: 3208 GPM
Field - Conductivity: 587 umhos/cm
Field - Temperature: 10.1 Deg. C

Comments: Dissolved Metals Field Filtered

SGS Minerals Sample ID: 782-1636561-003

Table with columns: TESTS, RESULT, UNIT, METHOD, REPORTING LIMIT, DATE, ANALYZED TIME, ANALYST. Rows include Manganese, Mn - Total; Potassium, K - Dissolved; Sodium, Na - Dissolved.

Handwritten signature of Domenic Ibanez

Lab Supervisor

Domenic Ibanez
Lab Supervisor

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Page 1 of 2

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Date Sampled: May 19, 2016
Date Received: May 19, 2016
Product Description: WATER

Sample ID By: Skyline Mine
Sample Taken At: VC-6
Sample Taken By: GG
Time Sampled: 1100
Time Received: 1420
Mine: 21
Site: 15
Field - pH: 8.86 pH
Field - Flow: 1687 GPM
Field - Conductivity: 595 umhos/cm

Comments: Dissolved Metals Field Filtered

SGS Minerals Sample ID: 782-1636561-005

Table with columns: TESTS, RESULT, UNIT, METHOD, REPORTING LIMIT, DATE, ANALYZED TIME, ANALYST. Rows include various chemical tests like Hardness, Anions, Balance, Cations, Alkalinity, etc.

Handwritten signature of Lab Supervisor

Lab Supervisor
Domenic Ibanez
Lab Supervisor

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Page 2 of 2

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Time Received: 1420
Mine: 21
Site: 15
Field - pH: 8.86 pH
Field - Flow: 1687 GPM
Field - Conductivity: 595 umhos/cm

Comments: Dissolved Metals Field Filtered

SGS Minerals Sample ID: 782-1636561-005

Table with columns: TESTS, RESULT, UNIT, METHOD, REPORTING LIMIT, DATE, ANALYZED TIME, ANALYST. Rows include Manganese, Potassium, and Sodium test results.

Handwritten signature of Domenic Ibanez

Lab Supervisor

Domenic Ibanez
Lab Supervisor

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May 27, 2016

Procedure for maintaining iron discharge compliance from the water discharge systems.

Over time the dissolved iron stored within the water in the gobs/sumps precipitates into solids and builds up in the piping systems sidewalls. To reduce the probability that this iron content will be dislodged and discharge into Eccles Creek, the following procedures must be followed.

Procedure must be followed when: Increasing water flow beyond current max discharge and/or after the water discharge piping system has been drained longer than 12 hours.

North Mains Discharge:

- 1) The surface, mine monitor person, and environmental engineers must be notified and put on alert.
- 2) The surface sediment pond must be drained down approximately 3' below the decant.
- 3) Before increasing water flow or charging the water lines, all water must be directed to the sediment pond and not allowed to flow into Eccles Creek. This will be done by turning the valves at the water decant which diverts discharge water into the sediment pond.
- 4) Prior to energizing the pumps and discharging water, an employee will be posted at the sediment pond and will be equipped with radio to communicate with the mine monitor person.
- 5) The water flowing into the sediment pond must remain clear continuously for 20 minutes before diverting the water into Eccles Creek. The person must watch the water entering into Eccles Creek an additional 60 minutes to ensure the water will stay clear.
- 6) The discharge pumping system will be shut down immediately if any evidence of iron or sediments in the discharge water is observed. The lines will then be back flushed and steps 1 through 5 will be repeated until the water clears.
- 7) All personnel involved with this process will be trained on these steps.

West Mains Discharge:

- 1) The surface, mine monitor person, and environmental engineers must be notified and put on alert.

- 2) Before increasing the flow or charging the lines with water, the discharge lines must be back flushed. The West Mains water discharge system is not directly plumbed into the surface sediment pond.
- 3) During back flushing, the person must stay in the proximity of the pager phone located at the discharge tanks and pumps. Once it is observed that the water continuous remains clear of iron and sediments, the pump will be shut off and the person will then relocate to the surface discharge culvert. This person will be equipped with a radio to communicate with the mine monitor system. After the employee is stationed at the surface discharge culvert, the mine monitor can then be requested to start the underground discharge pump system.
- 4) The water from the West Mains will be increased in increments of 400 gallons per minute until the desired flow rate is reached. When the discharge level exceeds 2,000 gpm, the water will be observed in 15 minutes increments before increasing to the next level. Once the desired maximum flow rate is achieved, the person must observe the water entering into Eccles Creek an additional 60 minutes to ensure the water will stay clear of iron and sediments.
- 5) The discharge pumping system in the mine will be shut down immediately if any evidence of iron or sediments in the water is observed. The lines will then be back flushed and steps 1 through 4 will be repeated until the water clears.
- 6) All personnel involved with this process will be trained on these steps.

If you have question or comments, please contact Mason Bishop at 435-448-2609

Sincerely,



Corey Heaps
General Manager, Skyline Mine