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file: ACT/007/006, #3
cc: Phil Ralphs
Tom Munson

PLATEAU MINING COMPANY

A Subsidiary of Cyprus Coal Company
P.O. Drawer PMC Price, Utah 84501
Telephone (801) 637-2875

December 30, 1986

RECEIVED
JAN 07 1987
DIVISION OF
OIL, GAS & MINING

Regional Administrator
Environmental Protection Agency
999 18Th Street
One Denver Place
Denver, CO 80202-2413

Re: NPDES Discharge Point 001-Permit UT0023736 Five Day Notice

Dear Sir:

Water discharged from Point 001 continues to exceed our current limit for total dissolved solids (TDS). We have corresponded with your office previously regarding this situation on 10/28/86, 8/20/86, 6/28/85, and 4/11/85.

We have recently met with Mr. Steve McNeal of the Utah State Department of Health, Bureau of Water Pollution Control to discuss renewal of our NPDES Permit. In this meeting, we discussed revising our permit to modify the TDS requirement.

We are in the process of doing an analysis of the situation and plan to submit application to modify the permit under Part II of the "Intercepted Groundwater Policy For Implementation Of The Colorado River Salinity Standards Through The NPDES Permit Program".

A copy of the most recent discharge analysis is attached. As you can see, TDS is 1108 mg/l which is above our limit of 650 mg/1. All other parameters are within limits.

Respectfully,

Ben Grimes
Senior Environmental Engineer

BG:vb

Attachments

cc: Utah Dept. of Health
DOGM

Chrono: BG861204

File: ENV 1-4-6

MOUNTAIN STATES ANALYTICAL

RECEIVED
DEC 19 1986
Ben G.

CERTIFICATE OF ANALYSIS

Client:
Plateau Mining Company
P.O. Drawer PMC
Price, Utah 84501
Attn: Ben Grimes

Lab. No. 1077
Date Rec'd. 12-15-86
Date Sampled 12-10-86
Time Sampled

Sample ID: Mudwater

Oil & Grease	<2.0	mg/l
pH	7.79	Units
Solids, Total Dissolved	1108	mg/l
Solids, Total Suspended	<5.0	mg/l
Iron	0.06	mg/l

Supervisor David Ramsey
Reviewed and approved 12-24-86

Respectfully submitted

1645 West 2200 South, Salt Lake City, Utah 84119 (801) 973-0050

6) Revegetation methods will consist of use of a seed drill, broadcast and drag, or transplanting live rooted stock.

7) If irrigation is needed to establish vegetation, it will be used.

8) Maintenance of the revegetated areas will consist of a minimum biannual inspection and steps will be taken upon inspection to augment revegetation or erosion control.

Conclusions and Recommendations

The Division recommends tentative approval of the amendment so that publication can be accomplished and the 30-day comment period will begin. The Division has some concerns that Plateau must address prior to final approval.

1. Topsoil Stockpile

The operator should submit a cross section of the topsoil stockpile which demonstrates that stability and erosion of the stockpile will not occur. Vegetation of the topsoil stockpile should be addressed. The volume of topsoil (growth media) should be included.

2. Soil Testing

The topsoil (growth media) or any material that revegetation will be attempted should be tested. A standard fertility test including, but not limited to, pH, EC, texture, potassium phosphorus, lime, etc., should be accomplished. A sodium absorption ratio should be performed.

3. Vegetation

Approval of Plateau's original mine reclamation included test plots. A plan for these test plots must be submitted prior to final approval. The test plots must be established in the fall of 1980. Seed mixtures for revegetation can thus be determined.

4. Access Road

The access road to the site is not addressed except that Plateau's report refers to the construction. The road should be addressed as to location, topsoil stockpiling, maintenance and reclamation.

5. Archeological Clearance

The map submitted for archeological clearance does not show that archeological clearance has been accomplished in the areas of disturbance. Plateau must demonstrate that archeologic surveys have been accomplished in the areas of disturbance and that clearance proceedsfinal approval by the Division.

6. Division of Water Rights

Plateau must agree that the conditions outlined by the Division of Water Rights in the September 19, 1980, letter to Ron Daniels will be followed.

7. Bureau of Water Pollution Control

Plateau must secure all necessary permits and agree to adhere to the conditions of the Bureau of Water Pollution Control prior to final approval.

8. Reclamation

Plateau should resubmit a map of the impoundment area outlining the details of final grading and discuss and mitigate the potential hazards of toxic evaporates in the existing and proposed impoundments, during mining and after reclamation.

9. Underground Mining

Plateau must insure the underground mine workings will not affect the stability or integrity of the dam and impoundment.

10. Fencing

Plateau must submit plans to fence off the impoundment for wildlife and public protection.

11. Calculation of Size

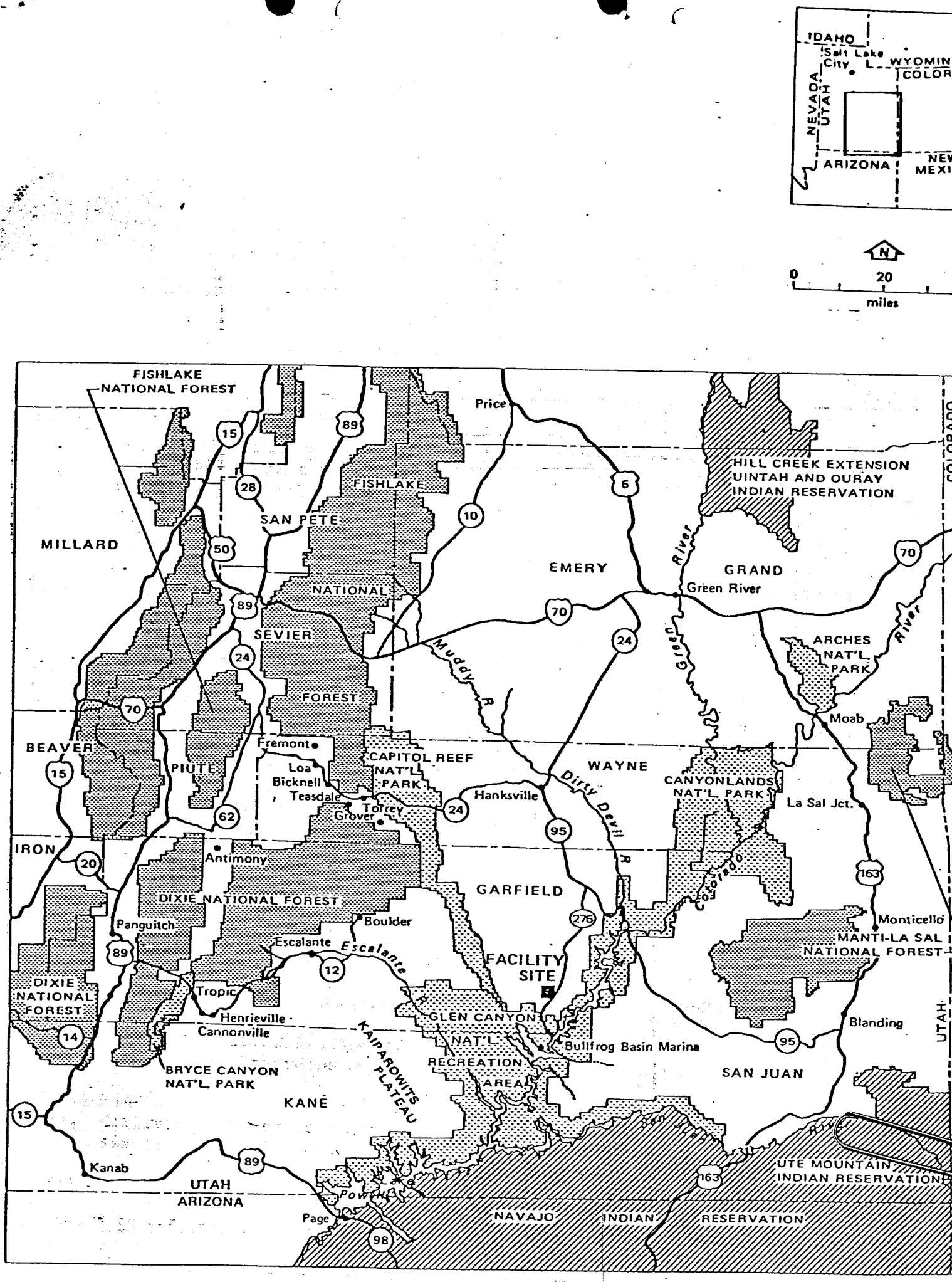
Plateau or Plateau's engineers should submit analyses and calculations veryifying the size of the contributing watershed and potential flows for the 20 year event. Analyses and calculations of the overflow volume should be presented.

12. Pipeline and Water Tank

The provisions to ensure that the existing ponds do not overflow should be incorporated. Maintenance and cleanout of the pipeline must be discussed, providing for maintenance so that mine discharge water will not accidentally enter surface waters.

13. Surety

Plateau must post the surety prior to construction activities or final approval.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Green River
Green River
Muddy R
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CAPITOL REEF NAT'L. PARK
Hanksville
WAYNE
Dirty Devil R
CANYONLANDS NAT'L. PARK
La Sal Jct.
IRON
Antimony
DIXIE NATIONAL FOREST
GARFIELD
Cotorado
Panguitch
Boulder
Escalante
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FACILITY SITE
Monticello
MANTI-LA SAL NATIONAL FOREST
DIXIE NATIONAL FOREST
Tropic
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Cannonville
GLEN CANYON NAT'L. RECREATION AREA
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