0012

File A4/007/019 #5

United States Department of the Interior

OFFICE OF SURFACE MINING
RECLAMATION AND ENFORCEMENT
SUITE 310
625 SILVER AVENUE, S.W.
ALBUQUERQUE, NEW MEXICO 87102

MAY 27 1988

TAKE PRIDE IN AMERICA

In Reply Refer To:
4480
INE

Permit: 007/019
Mine Name: Centennial Project

RECEIVED
MAY 31 1988
DIVISION OF
OIL, GAS & MINING

Mr. Lowell Braxton
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Dear Mr. Braxton:

The attached Office of Surface Mining Reclamation and Enforcement (OSMRE) inspection report identifies violations that are considered to have existed at the time of the previous State complete inspection but had not been cited.

Date of Federal Inspection 5-19-88 Date of State Inspection 4-21-88

The determination that the State did not cite the violations is based on one or more of the following reasons:

_____ The condition was identified in a State inspection report but no State enforcement action was taken.

_____ Design criteria or required certification has not been met for a structure in existence as of the last complete inspection (sediment pond, excess spoil fill, etc.).

X Necessary controls that were required at the time of the last complete State inspection have not been established (diversion ditches, sediment ponds, top soil protection, signs and markers, etc.).

X Site conditions indicate that the violation noted had been in existence at the time of, or prior to, the last complete State inspection.

_____ Other (give explanation).

Although the violation was cited by the State during a joint inspection, OSMRE feels that the violation was evident during the last complete inspection.

Indicate below the Division's reasons for not citing the alleged violations.

_____Not a violation

_____Precluded by State policy

_____Not included under State program

_____Warning given in Lieu of a Citation

_____Violation not recognized (missed)

_____Practice allowed under approved permit

_____Too minor to cite

_____Working with operator to correct

_____Other:_____

Signature_____ Date_____

Please return your signed and dated response to the Albuquerque Field Office at your earliest convenience.

Sincerely,

Stephen G. Rathbun,
Supervisory Reclamation Specialist

Attachments

★ U.S. GOVERNMENT PRINTING OFFICE: 1987—174-097

United States Department of the Interior
Office of Surface Mining
Mine Site Evaluation Inspection Report

For Office Use Only

1a (Y Y M M) 1b (Batch) 1c (Report)

2. Name of Permittee: Andalex Resources

3. Street Address: PO Box 902

4. City: Price

5. State: Ut

6. Zip Code: 84501

7. Area Code: 801

8. Telephone Number: 637-53

9. MSHA Number: 42-01474-

10. Date of Inspection (Y Y M M D D): 880519

11. State Permit Number: Act 007/019

12. Name of Mine: Centennial Project

13. County Code: 007

14. State Code: Ut

15. Strata:

16. State Area Office:

17. OSM Field Office No.: 02

18. OSM Area Office No.:

19. OSM Sample No.: 0428

20. Type of Inspection (Code): C

21. Joint Inspection Yes: X No:

22. Inspector's ID No.: 107

23. Status

A	01	Type of Permit
B	A	Mine Status (Code)
C	20	Type of Facility (Code)
D	02578.4	Number of Permitted Acres
E	00031.0	Number of Disturbed Acres

24. Type of Activity (check applicable boxes)

A		Steep Slope	E		Anthracite
B		Mountain Top Removal	F	X	Federal Lands
C		Prime Farmlands	G		Indian Lands
D		Alluvial Valley Floors	H		Other

25. Performance Standards (Codes)

Instructions: Indicate compliance code. For any standard marked 2 or 3 provide narrative to support this determination.

Standards That Limit the Effects to the Permit Area

A	1	Distance Prohibitions
B	1	Mining Within Permit Boundaries
C	1	Signs and Markers
D	2	Sediment Control Measures - OSM TDN - DOGM NOV
E	1	Design and Certification Requirements—Sediment Control
F	1	Effluent Limits
G	2	Surface Water Monitoring } DOGM issued NOV
H	2	Ground Water Monitoring } DOGM issued NOV
I	1	Blasting Procedures
J	1	Haul/Access Road Design and Maintenance
K		Refuse Impoundments
L		Other: Specify

Standards That Assure Reclamation Quality and Timeliness

M	1	Topsoil Handling
N	1	Backfilling and Grading
O	1	Following Reclamation Schedule
P	1	Revegetation Requirements
Q	1	Disposal of Excess Spoil
R	1	Handling of Acid or Toxic Materials
S	1	Highwall Elimination
T	1	Downslope Spoil Disposal
U	1	Post Mining Land Use
V	1	Cessation of Operations Temporary
W		Other

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United States Department of the Interior
Office of Surface Mining
Mine Site Evaluation Inspection Report

26. State Permit Number Act 007/019

27. Date of Inspection (Y Y M M D D) 880519

28. Yes ☐ No ☐ Do mining and reclamation activities on the site comply with the plans in the permit? If no, provide narrative to support this determination.

29. Indicate number of complete and partial inspections conducted by the State to date for this annual review period:

29a. 04 Number of Completes 29b. 06 Number of Partials

30. Indicate number of complete and partial inspections required by the State during this annual review period:

30a. 03 Number of Completes 30b. 07 Number of Partials

31. Has inspection frequency been met?

31a. Yes ☒ No ☐ Completes 31b. Yes ☒ No ☐ Partials

32. FEDERAL ENFORCEMENT INFORMATION. [Enter violation number. Check appropriate box(es)]

	Ten-Day Notice No.	Notice of Violation No.	Cessation Order No.	Violation Codes
	88-04-107-6(1-2)			
A	☐	☐	☐	Authorizations to Operate
B	☐	☐	☐	Signs and Markers
C	☐	☐	☐	Backfilling and Grading
D	☐	☐	☐	Highwall Elimination
E	☐	☐	☐	Rills and Gullies
F	☐	☐	☐	Improper Fills
G	☐	☐	☐	Topsoil Handling
H	☒ Two Violations	☐	☐	Sediment Ponds
I	☐	☐	☐	Effluent Limits
J	☐	☐	☐	Water Monitoring
K	☐	☐	☐	Buffer Zones
L	☐	☐	☐	Roads
M	☐	☐	☐	Dams
N	☐	☐	☐	Blasting
O	☐	☐	☐	Revegetation
P	☐	☐	☐	Spoil on the Downslope
Q	☐	☐	☐	Mining Without Permit
R	☐	☐	☐	Exceeding Permit Limits
S	☐	☐	☐	Distance Prohibitions
T	☐	☐	☐	Toxic Materials
U	☐	☐	☐	Other Violations

33. Name of Authorized Representative *(print or type)* Rade H. Orell

Signature of Authorized Representative Rade H. Orell Date 5-25-88

34. Administrative Information

a 06.0 Permit Review (Hours)

b 04.5 Travel Time (Hours)

Andalex Resources
P.O. Box 902
Price, Utah 84501

Centennial Project
Utah Permit #007/019

Oversight Inspection
May 19, 1988

Participants:

Rade H. Orell, Office of Surface Mining Reclamation and Enforcement, Albuquerque Field Office (AFO), Darron Haddock, Utah Division of Oil, Gas, and Mining (DOGM), Mike Glasson, Andalex Resources, (operator's representative).

Mine Site Evaluation Inspection Report:

This was an oversight inspection therefore the Mine Site Evaluation Insepction Report form has been completed accordingly. The inspection resulted in the issuance of Ten-Day Notice 88-02-107-6, (1-2), (TDN) to the State of Utah, DOGM. The DOGM also issued a Notice of Violation (NOV) to the operator. The enforcement actions are described by the number 2 at Performance Standard Codes D, Sediment Control Measures, G, Surface Water Monitoring, and H, Ground Water Monitoring. The DOGM NOV includes surface and ground water monitoring, sediment pond maintenance and diversion ditch maintenance. The DOGM representative included all theproblems in one NOV siting failure to comply with the terms and conditions of the approved permit in accordance with UMC 771.19. Each is explained in greater detail later in this report.

Introduction:

The inspection commenced the morning of May 19, 1988 at approximately 8:00 AM and terminated at approximately 6:30 PM. The weather was clear and mild. Ground conditions were dry. A Pentax IQ Zoom camera was used to photograph areas of interest. I provided the operator's representative with the oppurtunity to view my credentials.

Records Review:

The inspection commenced at the mine office with the records review. The records we reviewed and discussed included the March 1987 5 Year Permit Renewal, December 23, 1987 MRP Deficiency Letter, NPDES

Permit, "As-Built" certification for the sediment ponds, Surface and Ground Water Monitoring Records, Quarterly Sediment Pond Inspections, Subsidence Monitoring, Haul Road Certifications, Certificate of Liability (effective July 1, 1987, remain in full force for the life of the permit), Bond, and SPCC.

March 1987 Permit Renewal - The review of this document in conjunction with the December 23, Deficiency letter seems to indicate that the permit was conditonally issued with substantial deficiencies (the document contains 15 pages of deficiencies). This information will be provided to the appropriate individuals in the AFO for their review.
NPDES Permit - The review of the NPDES permit indicated that the permit expired in December 1986 and that the EPA provided the operator with an automatic continuation, in a letter dated December 4, 1986 pending completion of their review. There is also some confusion as to the number of designated outfalls. It appears that the Wildcat Loadout NPDES may have been combined with the Centennial Project as the permit describes six outfalls, there are only two at the Centennial Project. We also remined the operator that discharge monitoring reports are required to submitted to the EPA within 28 days following the completion of the reporting period. The review of monitoring reports indicated that no discharges have occurred.

Surface and Ground Water Monitoring Records - The review of the surface and ground water monitoring records indicated that the operator has not been completeing field analysis of certain parameters. The operator's representative confirmed that field analysis of pH, Condutance, Temperature and Discharge have not been a part of the on-going monitoring program. The current MRP at Volume I, Chapter 9, page 24 indicates that the field parameters descirbed above are a part of the water monitoring program. In that regard the DOGM representative issued an NOV to Andalex for failure to comply with conditons of the approved permit in accordance with UMC 771.19.

Field Inspection:

The field part of the inspection commenced at the North end of the disturbed area on the road where the powder magazines are located. We inspected the mine in a southerly direction terminating at the Administrative Office. I used the Centennial Project - Support Facilities - As Constructed Deadman Canyon Map, dated 12/86 to facilitate the inspection. The DOGM representative used a copy of the same map dated August 1987. We referred to both maps during the inspection. We inspected the various water control structures, topsoil stockpiles, the Apex Portals, Lower Pinnacle Portals, and the office area.

Water Control Structures - The water control structures include the various culverts used to divert the primary ephemeral channel as well as the tributary channels, diversion ditches and seiment ponds.

The culvert system consists of a large buried corragated metal pipe (CMP) in the main ephemeral channel and numerous smaller CMPs in the tributary channels that adjoin the large CMP. The entire culvert system is buried and provides diversion of undisturbed runoff. In that regard the inlets are the only parts of the culverts that are visible. We found that the culverts were in generally in good repair with very minor amounts of debris at their inlets.

In the case of the diversion ditches we observed problems that the DOGM representative included in the NOV referenced above. The maps referenced above depict a drainage control ditch along the west side of the facilities area just south of the Apex Mine. The ditch is apparently supposed to divert flows in a southerly direction. We found that the ditch was non-existant at the North end near the Apex Mine. We continued along the route of the ditch to a point where it exits the pad behind the shop. We found that the ditch where it borders the shop was inplace but in disrepair. The inspection of ditches continued with observations of the ditch above the Lower Pinnacle Portals. The map indicates the structure should be rip rapped. The inspection indicated the structure is not rip rapped and in need of maintenance. Material from the cut bank has sloughed into the ditch channel along a major part of its length. In consideration of the requirements specified by the map, which is part of the approved MRP, the DOGM representative included the problems at the structures in the NOV. The NOV was issued for failure to comply with the conditions of the approved permit in accordance with UMC 771.19.

There are three sediment ponds located at the Centennial Project. The ponds are labeled "A", "B" and "C"; they function in series with the ultimate discharge point being pond C. The DOGM approved the operator to remove pond "A" from the system when ponds "B" and "C" were constructed. Pond "B" actually consists of four cells seperated by interior berms that serve to the filter effluent. We found that Pond "B" contains a substantial amount of silt. The operator proposes to remove the material for use as fill at the proposed Aberdeen Portal when the amendment for the activity is apporved. In the mean time the silt remains in the pond. The pond includes two seperate spillways, they as well the embankment were generally in good repair at the time of the inspection. While the accumulation of sediment is a question the approved design information that we reviewed did not contain sufficient information to determine the extent to which the pond design capacity for such material may have been exceeded. In addition, the DOGM December 23, 1987 comments indicate deficiencies with the sediment control system. To the extent that those defencies have been resolved is not applicable to the plan under which the operations are being conducted (the revised MRP has not been offically aproved by DOGM).

The inspection of sediment pond "C" indicated that the spillway consists of an inverted principal outlet combined with a vertical emergency, both discharge through one outlet which adjoins the buried ephemeral channel culvert described above. The spillways combined in one structure resulted in the issuance of TDN 88-02-107-6(1). In addition, the accumulation of sediment in this pond is a question. We

attempted to measure the sediment level using a hand level and the "As-Built" design for the pond. The design indicates the maximum depth of the pond is 12 feet and the principal spillway elevation (termed primary overflow) is at 7052. I used to the top of the overflow as a reference point. I measured the sediment level at the base of the overflow to the invert of the structure at 32 inches. Using the hand level I measured the elevation of the overflow relative to a point in the approximate middle of the pond and estimated approximately 8 feet of sediment. Back siting from the overflow to the same point proved inconclusive however. In addition, the approved MRP indicates sediment markers will be maintained in the ponds. We did not observe a sediment marker in this pond. The DOGM representative included the lack of sediment markers in the NOV referenced above, again citing UMC 771.19, as a failure to comply with the terms and conditions of the approved permit. Therefore, since the DOGM included yhe lack of sediment markers in the NOV I conceded the argument about sediment quantity in the pond.

Administrative Office - The inspection of this area indicates that drainage from the site does not pass through a sedimentation pond, series of sedimentation ponds or other treatment facility. The area includes the office, parking area, a topsoil stockpile, asphalt road, a met station and its associated pad, and area outslope. TDN 88-02-107-6(2) was issued for failure to pass the drainage from the area through a sedimentation pond in accordance with UMC 817.42. The TDN also includes the requirement to demonstrate that the areas qualifies for a Small Area Exemption if it is not to be passed through a sediment pond as an alternative to the requirement to pass. Coincidentally, the DOGM deficiency letter referenced indicates the same problem; I was not aware of the comment at the time the TDN was issued.

Close-Out:

We basically held two close-out meeting. The first included the DOGM representative and me. We discussed the inspection, listed the problems identified and agreed on the course of action each of us would take. We then met with the operator's representative. we advised him of the action we intended to take; we dicussed the inspection findings.