

0017

Document Information Form

Mine Number: C/007/022

File Name: Internal

To: DOGM

From:

Person N/A

Company N/A

Date Sent: February 14, 1983

Explanation:

Inspection Memo

cc:

File in: C/007, 022, Internal

Refer to:

- Confidential
- Shelf
- Expandable

Date _____ For additional information

February 14, 1983

Inspection Memo
to Coal File:

#7

RE: C. V. Spur
Beaver Creek Coal Company
ACT/007/022
Carbon County, Utah

DATE: December 15 and 16, 1982
TIME: 1:30 to 4:15 P.M., 8:00 to 8:45 A.M., 4:00 to 4:30 P.M.
WEATHER: Clear, 50° F
COMPANY OFFICIALS: Scott Raymond
STATE OFFICIAL: Sandy Pruitt
ENFORCEMENT ACTION: NAOC #82-2-12-1

Compliance With Permanent Performance Standards

UMC 771 Permits et al

Verbal approval of C.V. Spur operations which was granted in 1979 was later documented in a letter dated September 24, 1981. The approved plan consists of a Notice of Intent (Form MR 1) dated October 23, 1979 and a Mine Reclamation Plan (Form MR 2) dated September 20, 1979. A permanent program application was submitted on August 19, 1980. The ACR was sent to Beaver Creek Coal Company on April 3, 1981. Beaver Creek Coal Company has not responded to the ACR yet.

Approval to backfill sediment pond #4 for use as a coal stockpile area was granted on October 20, 1982 with the 7 stipulations. Pond #5 was enlarged to replace the runoff capacity of pond #4. The new inlet to pond #5 has not been rip-rapped yet. According to a letter dated January 10, 1983, all stipulations have been adequately responded to as of December 22, 1982. According to that letter, filter pond #6 is to be extended no later than May 1, 1983.

Jim Voorhees called Sandy Pruitt on December 10, 1982 to request approval of an emergency coal stockpile area located south of the new truck dump. Members of the technical staff inspected this site on December 13, 1982 and verbally approved the proposal on December 15, 1982 with the condition that adequate plans be submitted by December 17, 1982. The inadequacies in the plans received December 17, 1982 were to be addressed by stipulations no later than January 10, 1983. Final approval of the coal stockpile plans as specified in the December 17, 1982 submittal and the response to stipulations dated January 14, 1983 was granted on January 21, 1983.

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Refer to Record No. 0017 Date 2-14-83

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Beaver Creek Coal Company submitted a request for a small area exemption from sediment control on December 20, 1982. The small area is a depression located south of the pump house and east of filter pond #6. Additional information was requested in a letter dated January 21, 1983.

In a letter regarding the thickener overflow pond and preparation plant dewatering dated November 22, 1982, it was requested that Beaver Creek Coal Company address deficiencies noted in the ACR and determine the required storage capacity of the thickener pond and sediment ponds #1, 2, 3, and 6, with respect to the volume of water that may be discharged from the preparation plant and rate of recirculation into the plant. These deficiencies were to be addressed no later than January 26, 1983. As of this writing Beaver Creek Coal Company has not adequately responded to the November 22 letter. They proposed constructing a pond sized to contain the preparation plant water only and in that way provide adequate runoff storage capacity in the sediment ponds to prevent a violation.

UMC 817.11 Sign and Markers

A chainlink fence along the south and west boundary, the railroad tracks to the east and a wire fence along the north canal serve as adequate perimeter markers of the permit area, but there is no delineation of the undisturbed areas intermingled within the affected area. The permitted disturbed area should be clearly delineated from unaffected areas. The piecemeal modifications to the 1979 mine plan necessitates a delineation of the permitted disturbed area, to insure that unaffected topsoil is protected and unauthorized disturbances minimized. At a minimum the soils map submitted in the permanent program application (Exhibit 6) can be updated and used as a guide for the delineation until the plan is approved and a bond amount determined.

UMC 817.21 - .25 Topsoil

Soil samples taken along the route proposed for the new haul road at the base of the new truck dump indicated that the topsoil is of poor quality. Beaver Creek Coal Company proposed leaving the topsoil in place and upon final reclamation using either extra topsoil available from another area (which is unlikely) or providing a suitable topsoil substitute. This plan was approved January 10, 1983. The area within the extension of pond #5 was considered predisturbed so no topsoil was salvagable.

Another plan to develop a raw coal storage area on the same site just south of the new truck dump proposed removal of topsoil if weather permits. The December 28, 1982 approval of the plans granted a variance for removal of topsoil provided that chemical and physical analyses of the proposed topsoil substitute are submitted to DCGM no later than June 1, 1983 and that the substitute material is of higher quality than that left on-site.

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At the time of this inspection burning coal had been spread out along the road to the west of the topsoil stockpile. The coal pile closely encroached the stockpile and the undisturbed area on the opposite side of the road. It was requested that this burning coal pile be retrieved to the center of the road immediately and a buffer zone established before the topsoil stockpile and the undisturbed area. A follow up inspection was conducted the next day at which time all of the burning coal had been removed from the road.

UMC 817.41 - .57 Hydrologic Balance

The ditches draining the preparation plant yard and the coal stockpiles are undersized and poorly maintained. The cross culverts at the base of the large silo were obstructed by road refuse. A berm in between the outlet of the cross culvert under the railroad and the inlet to the cross culvert under the road to the pump house, which is at the base of the large silo is too small to adequately retain disturbed area from the small depression east and down drain from the filter pond. NAOC #82-2-12-1 was issued on December 16, 1982 requiring maintenance of sediment control measures (UMC 817.45, UMC 817.165) by January 15, 1983. All drainage ditches and culverts must be reestablished and maintained to safely pass the peak runoff from a 10 year, 24 hour storm event as specified in the approved mine reclamation plan, maintaining a minimum 0.3 foot freeboard [UMC 817.43 (a), (f)(2)].

Overflow from the water tank and the plant drains into sediment pond #1. Since a new flotation circuit was added to the process in October an unusual amount of excess water has been drained into the sediment ponds to achieve a plant water balance. The high water levels in ponds #1, 2 and 3 since October (when the plant was dewatered due to a water imbalance) are evidence that the rate of recirculation of water back into the preparation plant does not provide for runoff volumes in the sediment ponds. Water residue in the discharge pipe for filter pond #6 is evidence that the pond has discharged at some time. No discharge has been reported.

NPDES permit #UT-0023949 was issued March 25, 1982 and will expire December 31, 1986. The permit authorizes discharge from the sediment ponds (001). A discharge from the preparation plant (002) is authorized only if the bypass is necessary to prevent loss of life, personal injury or severe property damages and no alternatives are feasible. Notification of an anticipated bypass is required at least 10 days in advance and an unanticipated bypass should be reported within 5 days. No discharges have been reported for points 001 or 002.

Water monitoring data from August to October was available for inspection and has been submitted to DOGM. The flow in the french drain which drains water into the pump house for circulation into the plant was measured at 30 gpm on August 25, 7 gpm on September 23 and 15 gpm on October 13, 1982.

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UMC 817.97 Protection of Fish, Wildlife and Related Enviromental Values

The U. S. Fish and Wildlife conducted a survey of the power line at the C. V. Spur and reported on November 10, 1982 that the power lines would not be used by raptors and therefore would not need to be modified to prevent raptor electrocution.

The construction of the raw coal storage pad to the south of the new truck dump will bury a relatively small prairie dog mound. Population stresses have apparently already caused a portion of the colony to relocate in the topsoil and subsoil stockpiles.

UMC 817.160 - .166 Roads - Class II

The poor maintenance of drainage control structures along the Class II roads to the refuse disposal area has resulted in inadequately sized ditches and partially obstructed culverts so that they are not functioning as designed in the approved mine reclamation plan to safely pass peak runoff from the 10 year, 24 hour precipitaiton event and as required by UMC 817.163 (a)(1), (2)(c), (1)(i), (ii), (iv) and UMC 817.165. NAOC 82-2-12-1 requires maintenance of all sediment control structures by January 15, 1983.

SANDY PRUITT
FIELD SPECIALIST

SP/lm

cc: Tom Ehmett, OSM
Scott Raymond, BCCC
Joe Helfrich, DOGM

Statistics:

See Genwal Mine memo, dated January 4, 1983.