



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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April 10, 2001

TO: **Internal File**

FROM: Gregg A. Galecki, Reclamation Specialist & Team Lead *AGH*

RE: Silt Fence Removal, Canyon Fuel Company, LLC, Banning Loadout, C
AM01A

SUMMARY:

The proposed amendment changes to the Banning Loadout were received at the Division on March 27, 2001. The primary changes address the removal of silt fences as a form of Alternate Sediment Control from within the drainage ditch servicing the paved haul road providing access to the facility. Also included in the amendment is the elimination of a Surface Water monitoring point located at a straw bale exiting the drainage ditch. The affects of this proposal were evaluated during the Midterm Mine site visit conducted April 4, 2001. This review relates solely to the hydrologic prospective.

Information found in the proposal is considered adequate to meet the requirements of the State regulations.

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.

TECHNICAL MEMO

Analysis:

Ground-water monitoring

A total of one groundwater site is monitored at Banning Loadout; the Truck Sump, respectively, is sampled annually during the third quarter. Currently, the MRP refers to an analysis parameter list that is not clearly outlined. A table that clearly outlines the parameters to be analyzed needs to be included in the MRP. The request to submit a parameter table was done at this time because the entire chapter 7 is being resubmitted.

Findings:

R645-301-731.211, the applicant needs to submit a table that clearly outlines the parameters to be analyzed.

Surface-water monitoring

The stream sample named 'Straw bale Q' is located in the drainage ditch servicing the paved haul road accessing the Site. Since 1987 no samples have ever been collected from this sample location. Originally, this sample location was designed to measure the TSS leaving the drainage ditch while vegetation was being established along the banks of the ditch. Current observations indicate the straw bales are no longer necessary based on the vegetation within the banks of the ditch, the low gradient design of the ditches, and the minimal amount of sediment accumulated upstream of the sediment control. It has also been determined that the drainage ditches minimize additional contributions of suspended solids to streamflow outside the permit area.

Findings:

R645-301-731.224.2, Monitoring is no longer necessary to achieve the purposes set forth in the monitoring plan approved under R645-301-731.221.

Sediment control measures

A total of twelve silt fences and two straw bale structures have been authorized for removal from within the drainages ditches (both sides of road) servicing the paved haul road accessing the site. The sediment control devices were located where overland flow from the ditches leaves the Permit Area and enters undisturbed drainages. Authorization for removal is based on well-vegetated banks within the ditches, the low gradient design of the ditches, and the minimal amount of sediment accumulated upstream of the sediment control. Revised Exhibits 7-1 and 7-1a illustrate these changes by omitting the sediment control from the Site drawings.

Recommendations include that portions of the silt fences, currently buried beneath sediment, will not be disturbed during removal. Exposed silt fences, wire netting, and T-posts will be cut off at the surface, and accumulated sediments will remain undisturbed.

Authorization for removal of the sediment control is being granted with the understanding that approval may be rescinded during future Site Inspections if the ditch design is determined to be inadequate.

Findings:

R645-301-742.111, -742.112, Appropriate sediment control measures will be designed, constructed, and maintained to prevent, to the extent possible, additional contributions of sediment to stream flow or to runoff outside the permit area.

R645-301-763.100, Siltation structures will be maintained until removal is authorized by the Division, and the disturbed area has been stabilized or revegetated.

R645-301-742.124, Sediment Control remains in check by using check dams, vegetative sediment filters, and other measures that reduce overland flow velocities, reduce runoff volumes or trap sediment.

RECOMMENDATION:

The amendment adequately addresses the requirements of the State Regulations. Conditional approval is recommended contingent on the submittal of a Groundwater parameter table.