



State of Utah
 DEPARTMENT OF NATURAL RESOURCES
 DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt
 Governor
 Kathleen Clarke
 Executive Director
 Lowell P. Braxton
 Division Director

1594 West North Temple, Suite 1210
 PO Box 145801
 Salt Lake City, Utah 84114-5801
 801-538-5340
 801-359-3940 (Fax)
 801-538-7223 (TDD)

April 23, 2001

TO: [REDACTED]

THRU: Pete H. Hess, Reclamation Specialist, and Team Lead

FROM: Gregg A. Galecki, Reclamation Specialist *GA*

RE: Midterm Review, Canyon Fuel Company, LLC, Banning Siding Loadout,
 [REDACTED] MT01

SUMMARY:

The following review of the Banning Siding Loadout Mine plan is focused on midterm elements outlined in a letter sent to the Permittee on January 29, 2001. This technical memo focuses on the hydrologic aspects of the permit; primarily the 'commitment for application of the best technology currently available (BTCA) to prevent additional contributions of suspended solids to stream flow outside of the permit area.' The contribution of suspended solids to stream flow outside the permit area was the primary focus of a technical visit attended by Division and Permittee personnel on April 5, 2001. The use of BTCA is discussed in detail in Amendment AM01A, which eliminates the use of silt fences and straw bales from within the drainage ditch servicing the paved primary access road to the site. This review indicates the permit adequately addresses the requirements to prevent additional contributions of suspended solids to stream flow outside the permit area. ←

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, -300-148, -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 ground-water monitoring site exists at the site (Truck Sump). It is sampled on an annual basis during the Third quarter each year. Traditionally, the sump has been pumped prior to collecting the sample. During the 2000 sample collection, a baler was used to extract the sample. The first water drawn from the sump was used for the sample and some distinct variability was encountered in the analysis. It is recommended, at a minimum, that multiple bales be lifted from the sump and field parameters determined to be stable prior to collecting the sample.

Finding:

Information provided in the MRP adequately addresses the requirements of this section of the regulations.

Surface-water monitoring

A surface-water monitoring site was eliminated with the elimination of the straw bales from the primary access road. The site has never sampled due to 'No Flow' conditions. The original purpose of the sample was to monitor the sediment load leaving the ditch servicing the access road. The technical visit determined this was no longer necessary based on the vegetation existing within the ditch.

Finding:

Information provided in the MRP adequately addresses the requirements of this section of the regulations.

Sediment control measures

A total of five Alternate Sediment Control Areas (ASCA's) and one Small Area Exemption (SAE) regulate the amount of sediment leaving the Disturbed Area of the permit. The site has been under Temporary Cessation as of March 7, 2000, which has further reduced the amount of sediment leaving the site. The performance of all five ASCA's and the SAE were evaluated during the Technical Visit conducted on April 5, 2001, and determined to be performing adequately. Future amendments to the MRP will be submitted to eliminate silt fences from ASCA #1 and reduce the number of silt fences at ASCA #2 from two to one. The decision to eliminate the silt fences at ASCA #1 will be based on existing contours, established vegetation, and roughening of the surface. Extensive discussions at ASCA #2 were inconclusive

to whether the elimination of all silt fences was possible. The consensus determined a minimum of one silt fence was required to control sediment leaving the Disturbed Area.

The elimination of silt fences and straw bales from the ditch servicing the paved primary access road to the site was based on two principles (as discussed in Amendment AM01A): 1) the sediment load from the ditch is not adding additional sediment load outside the permit area; and 2) the ditch is adequately designed to serve as a form of sediment control.

Finding:

Information provided in the MRP adequately addresses the requirements of this section of the regulations.

Sedimentation ponds.

The sediment pond, covered under UPDES permit UTG040011-001 and -002A, has never discharged. The bottom of the pond is near or at the water table, and abundant vegetation exists. The pond has never been cleaned, and is certified to be stable.

Finding:

Information provided in the MRP adequately addresses the requirements of this section of the regulations.

RECOMMENDATION:

This review indicates the MRP adequately uses BTCA to prevent additional contributions of suspended solids to stream flow outside the permit area.