



October 31, 1984

TO: Coal File, Inspection and Enforcement Folder  
 FROM: David Lof, Mining Field Specialist   
 RE: Diamond Shamrock Coal Unit, Trail Mountain Mine,  
ACT/015/009, Folder #7, Emery County, Utah

DATE: August 24, 1984  
TIME: 2:30 - 6:30 p.m.  
WEATHER: Clear and Warm  
COMPANY OFFICIAL: Allen Childs  
STATE OFFICIAL: David Lof  
ENFORCEMENT ACTION: NOV N84-4-12-2

Compliance with Permanent Performance Standards

UMC 771 et al Permits

The following permits and approvals were reviewed in the operators mine office.

1. A May 3, 1984 letter from the Division granting conditional approval of the as-built culvert structure for the Cottonwood Creek bypass culvert. The three conditions attached to the approval letter were:
  - A. The operator is required to reline the channel utilizing a filter blanket if interstitial scour or streambank erosion become evident in the future.
  - B. The channel cross sections and inlet riprap design drawings must be certified in accordance with UMC 784.23(e), and the certification be submitted by June 1, 1984.
  - C. The operator is required to install a box type trash rack as per the April 1983 submission by June 1, 1984. The operator was supposed to notify the Division of any delays regarding the installation of the trash rack so that a new implementation deadline could be established.

2. A May 23, 1984 letter from the Division allowing the operator to change their weekly sediment pond inspection schedule to a biweekly inspection schedule.

#### UMC 817.11 Signs and Markers

Complete mine identification signs were properly posted at both the south and north end of the operators mine site. Since the last inspection the operator installed a chain link fence along the east side of the mine site in order to deliniate the mine site from the county road and to control access to the mine site.

The Utah Power and Light mine identification sign for the Cottonwood Portal area which had been located on the west side of the county road, several hundred feet below the Trail Mountain mine had been moved, as requested during previous inspections.

#### UMC 817.21-.25 Topsoil

During a recent thunderstorm the inlet to the 48 inch undisturbed bypass culvert became plugged forcing runoff to overtop the culvert and go down the slope on which the topsoil stockpile is located. The runoff washed out strawbales and eroded a large portion of the topsoil stockpile. I asked Mr. Childs to regrade and reseed the topsoil stockpile and replace the strawbales as soon as possible.

#### UMC 817.41-.52 Hydrologic Balance

##### Sediment Pond Certification

During my May 29, 1984 inspection I had told Mr. Childs that the May 18, 1984 letter from R&M Consultants to the Division was not satisfactory for the purposes of sediment pond certification. I told Mr. Childs that the letter should be in the same format as the February 2, 1984 sediment pond certification and it should list the name of the representative of R&M Consultants who inspected the pond on May 10, 1984. In addition, the letter should be signed and stamped by a registered professional engineer.

At the time of the inspection Mr. Childs showed me a letter dated August 15, 1984 from Trail Mtn. to R&M Consultants requesting that the sediment pond certification be rewritten as per my request. On September 17, 1984 the Division received a letter from R&M Consultants certifying the sediment pond. The letter was found to be satisfactory.

### Half-round Culvert

On August 9, 1984 Mr. Childs called to tell me that the final 300 feet of half-round culvert at the north end of the mine yard had been installed as required. At the time of the inspection I found that the half-round culvert had indeed been installed.

The operator has ripped out approximately 450 ft. of half-round culvert between the upper scalehouse access point and the next access point north, and established an open ditch. Mr. Childs explained that they are having too many problems trying to maintain the half-round culvert in that area due to the fact that it is located adjacent to an active coal stockpile.

I have noted during many inspections that the half-round culvert in this area is a maintenance problem. It becomes filled with coal and gravel from the mine yard and then it has to be cleaned out by hand. During the winter when it fills up with coal and gravel the material freezes up in the half-round and is next to impossible to clean out. Therefore, I agree with the operators decision to remove the half-round culvert and replace it with the open ditch. Mr. Childs informed me that they had already sent plans modifying their approved plan to the Division. When I returned to the Division offices I found that the Division had received the plans on August 24, 1984.

### Cottonwood Creek Bypass Culvert Inlet

Mr. Childs showed me a June 17, 1984 letter to the Division requesting approval of an August 31, 1984 date for implementation of the approved changes to the inlet structure. The reason for postponing the implementation was continued high stream flows. At the time of the inspection they had not received any reply from the Division regarding the letter. Mr. Childs said that two contractors had looked at the culvert inlet and the associated plans, and that he is waiting receipt of their bids.

While looking at the inlet to the bypass culvert we inspected the berm which is on the west side of Cottonwood Creek and north of the culvert inlet. The berm had been damaged by recent thunderstorms. I asked Mr. Childs to have it repaired prior to the next monthly inspection.

48 Inch Undisturbed Bypass Culvert

As was mentioned in the topsoil section of this memo, the 48 inch undisturbed bypass culvert became plugged with sediment and debris during a recent and thunderstorm. Water coming down the canyon overtopped the headwall of the culvert causing severe erosion on the topsoil stockpile and around the north side of the topsoil. Mr. Childs had cleaned the inlet of the bypass culvert out prior to the inspection. During the inspection I suggested two sites to Mr. Childs where they could place additional trash racks up-stream of the culvert inlet in order to prevent the culvert inlet itself from being plugged in the future.

Notice of Violation N84-4-12-21

While inspecting the sediment pond we found that the pond was discharging and that the water level in the pond was not to the emergency spillway. Closer inspection found that the dewatering spillway's valve was wide open and locked open. The discharge was measured using a bucket and found to be approximately 200 gallons per minute. Samples were also taken of the discharge from the sediment pond and the undisturbed runoff from the bypass culvert outlet. The water samples were taken to the State Health Laboratory for analysis.

<u>Total Suspended Solids</u>	<u>Sediment Pond Discharge</u>	<u>Cottonwood Creek</u>
Total Suspended Solids (mg/l)	1,480	195
Specific Conductivity (umhos/cm)	450	500
TDS (mg/l)	250	274
Settleable Solids (ml/l)	1.8	0.5
Total Iron (ug/l)	1.85	
Total Magnanese (ug/l)	135	

Because the padlock on the dewatering device valve was locked Mr. Childs had to go get the key from the mine office. When he returned he said he could not find the key therefore he brought a pair of bolt cutters. We cut the chain and closed the valve.

According to Mr. Childs he had worked on the sediment pond last week trying determine where the leak in their dewatering device spillway was. At that time he said the valve for the dewatering device was closed. According to Mr. Childs the key for the padlock is accessible to anyone. Upon returning to the mine office Mr. Childs called Joe Fielder, the mine manager to see if he knew of the location of the key, and Mr. Fielder said that he had the key to the padlock in his office.

Because the dewatering device valve was open the sediment pond could not function in accordance with the approved design and which was short circuiting the designed system. Therefore Notice of Violation N84-4-12-2, #1 of 2 was issued, it reads as follows:

Nature of the Violation

Failure to conduct surface coal mining operations so as to prevent additional contributions of suspended solids to stream flow.

Failure to maintain the sediment pond and to prevent short circuiting.

Provisions of the Regulations Act, or Permit Violated

UCA 40-10-18 (2)(I)(ii),  
UMC 817.45  
UMC 817.46(e)

Portion of the Operation to Which Notice Applies

Sediment pond

Remedial Action Required

Close dewatering device valve

Time for Abatement

Immediately.

The violation was issued from the Division office on August 31, 1984.

Because the discharge from the sediment pond was obviously not meeting effluent limitations Notice of Violation N84-4-12-2, #2 of 2 was issued, it reads as follows:

Nature of the Violation

Failure of discharge from the disturbed area to meet effluent limitations

Provision of the Regulations, Act or Permit Violated

UMC 817.42(a)(7)  
UMC 817.41(c)  
UMC 817.45

Portion of the Operation to Which Notice Applies

Sediment pond

Remedial Action Required

Meet effluent limitations.

Time for Abatement

Immediately.

Because the operator closed the valve at the time of the inspection effectively terminating both violations, the Notice of Violation was terminated effective August 31, 1984.

UMC 817.52 Surface and Groundwater Monitoring

Water monitoring data was available through July of 1984. All chemical parameters had been measured and there were no apparent problems.

On July 31, 1984 the operator sent a letter to the Division requesting a modification to their water monitoring program. At the time of inspection they had not received a response to this request.

UMC 817.100 Contemporaneous Reclamation

On August 20, 1984 the Division received a letter from the operator regarding contemporaneous reclamation plans for the 1984 planning season.

kc

cc: Donna Griffin  
Allen Childs  
Joe Helfrich  
Sandy Pruitt  
Mary Boucek

Statistics: See Consolidation Coal Company, Emery Deep Mine Memo dated October 19, 1984

05840-8-13