



State of Utah

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August 23, 2002

TO: Internal File

FROM: James D. Smith, Sr. Reclamation Specialist/Hydrology, Team Lead *JDS*

RE: Midterm Permit Review, Pacificorp, Trail Mountain Mine, C/015/009-MT02

SUMMARY:

In a letter dated June 17, 2002, the Division notified Chuck Semborski, Energy West Environmental Supervisor, of the mid-term review. On August 8, 2002, Pete Hess, the inspector assigned to this mine, along with Daron Haddock, Jim Smith, Wayne Western, and Joe Helfrich of the Division conducted a mid-term inspection. Dennis Oakley represented the operator, Energy West, a subsidiary of PacifiCorp. Photos taken during this inspection are currently located at O:/015009.tmt/Images/08082002.

One of the purposes of the mid-term review is to review applicable portions of the permit to ensure that the plan contains commitments for application of the best technology currently available (BTCA) to prevent additional contributions of suspended solids to stream flows outside of the permit area.

During routine quarterly inspections and the mid-term inspection, Mr. Pete Hess of the Division has found several discrepancies between the way one ASCA is portrayed in the MRP and its actual construction and location at the minesite. The Permittee has submitted amendment C/025/009-AM02A to correct the MRP. Although there are discrepancies in the depiction of this ASCA in the MRP, the mid-term review and inspection have found that the plan contains commitments for application BTCA and that BTCA is being used to prevent additional contributions of suspended solids to stream flows outside of the permit area.

TECHNICAL MEMO

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.

Analysis:

Siltation Structures: Sedimentation Ponds

The sedimentation pond is designed for full containment of runoff from the disturbed area. The main stream channel and tributaries are diverted beneath the mine pad through by-pass culverts. The sedimentation pond as-built drawings are certified by a PE, and there have been no reported problems with operation of the pond. Parameters and methods used in the design are not in the MRP so they cannot be reviewed.

Siltation Structures: Other Treatment Facilities

There are two alternate sediment control areas (ASCAs) at the Trail Mountain Mine. One is at the north (upstream) end of the mine yard, where Cottonwood Creek is diverted into a bypass culvert. The other is just south of the sedimentation pond, at the outlet for the pond.

North ASCA

The north ASCA is just outside the perimeter fence of the parking area, on the outslope of the berm that separates the parking area from the undisturbed area and Cottonwood Creek. Silt fence is the designed sediment control for this small ASCA.

During recent inspections it has been noted that although the silt fence is in need of maintenance, it has not been breached. There has been no evidence of erosion or sedimentation or that sediment has reached the stream.

The permittee desires to remove the silt fence in order to reduce maintenance. The August 8, 2002 mid-term inspection report notes that, based on visual evidence, the silt fence is no longer needed. The ASCA is rocky but well vegetated, and the rock and vegetation, mainly

grass, appear to be providing most, if not all, of the sediment control. The inspection report includes a recommendation that the permittee submit an amendment to the MRP for removal of this silt fence.

South ASCA

At the south ASCA, straw bales were placed adjacent to the stream to trap sediment that might be washed from the outslope of the sedimentation pond. During the quarterly inspection on June 6, 2002, the straw bales at the south ASCA were found to be old, weathered, and falling apart, and there were large gaps between the straw bales: the same conditions were observed during the August 8, 2002 mid-term inspection. There was no sedimentation behind, between or in front of the bales, no signs of erosion, and no evidence of additional sediment or contributions of suspended solids to the stream at this location. It is evident that the bales are not capable of trapping sediment or preventing erosion in their current condition. Vegetation is well established upgradient of the ASCA, and it is vegetation, rock, and litter that are controlling sedimentation and erosion.

The description of this ASCA on page 38 (Chapter 7) and the design shown on Plates 3-1 and 7-5 in the MRP do not match what has been seen at the site during inspections. The straw bales described in the previous paragraph are downstream of and outside of the ASCA as it is shown on Plates 3-1 and 7-5. The Permittee has submitted an amendment to the MRP (C/025/009-AM02A) to more accurately portray this ASCA in the MRP. This proposed amendment includes removal of the straw bales, with the existing vegetation, rock, and litter providing sediment and erosion control.

Siltation Structures: Exemptions

There are no small area exemptions at the Trail Mountain Mine.

Findings:

Although there are discrepancies in the depiction of one ASCA in the MRP, the mid-term review and inspection have found that BTCA is being used to prevent additional contributions of suspended solids to stream flows outside of the permit area.

RECOMMENDATIONS:

Discrepancies concerning one ASCA in the MRP are already being addressed through an amendment. There is no further action recommended as a result of this mid-term review.