

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

December 4, 2008

TO: Internal File

FROM: James D. Smith, Environmental Scientist III *DS 2/19/09*

SUBJECT: 2007 Midterm Permit Review, Trail Mountain Mine, PacifiCorp, C/015/0009, Task ID #2878

SUMMARY:

In a letter dated November 15, 2007, the Division informed the Permittee that the Division would be conducting a midterm review of the Trail Mountain Mine permit. The Division is required to review each active permit during its term, in accordance with R645-303-211. This review is to take place at the midpoint of the permit term. The permit was renewed February 21, 2005.

Among the items chosen for review was:

3. A review of the applicable portions of the permit to ensure that the mine 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.

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.

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Analysis:

Sediment Control Measures

Locations of the single, small sedimentation pond and the two small ASCAs are shown on Plate 7-5. One ASCA is on the apron around the by-pass culvert inlet, the other on both sides of the stream below the outlets of the bypass culvert outlet and sedimentation pond discharge. They are described in Chapter 7, Section 7.2.4.2. Calculations and design details for the sediment control structures are in the appendices to Chapter 7.

Section 7.2.4.2 refers to a number of figures, but the references are imprecise and confusing.

- The first paragraph of Section 7.2.4.2 states that Figure 1 shows the “...pond location, pond drainage area boundary, ditches, and berms...”, but Figure 1 is a small-scale general location map.
- Sedimentation pond design details are supposed to be on Figure 7-7 (p. 7-39), but Figure 7-7 shows the Monthly Distribution of Flows for Cottonwood Creek.
- Figure 7-13 is described as outlining the details of seep-collar spacing (p. 7-41), but Figure 7-13 shows Wind Direction and Intensity on Meetinghouse Ridge: this figure is correctly referenced in Section 7.4.3
- There is no Figure numbered higher than 7-13, but the MRP describes Figures up to 7-17 (Figure 7-16 is not described, at least not in this section of the MRP).
 - The stage capacity curve for the pond is supposed to be in Figure 7-14 (p. 7-39), but information is on Figure 7-9.
 - Figure 7-15 is supposed to show that the discharge capacity of pond spillway, using the 48 in diameter riser-conduit combination, is adequate to pass the peak inflow from a 25-yr, 24-hr storm (p. 7-40); that chart is in Figure 7-10.
 - Figure 7-17 supposedly details the anti-seep collars (p. 7-41), but that information is actually on Figure 7-11.

A quick review of the rest of Chapter 7 found at least one more, similar discrepancy. Figure 7-8 is described in Sections 7.5.2 and 7.5.3 (pp. 7-50 and 7-51) as showing cross-sections of the restored channels. This information is on Figure 7-12.

Findings:

R645-301-121.100, -121.200, In Sections 7.2.4.2, 7.5.2, and 7.5.3, the Permittee must either provide the missing Figures or rewrite the text of the MRP so that the correct figures are referenced.

Figure 7-1	This figure does not show information described in the text (p. 7-35), and the information is not on another figure.	This figure is correctly referenced in Section 7.1.1.
Figure 7-7	This figure does not show information described in the text (p. 7-39), and the information is not on another figure.	This figure is correctly referenced in Section 7.2.4.1.
Figure 7-8	This figure does not show information described in the text (pp. 7-50 and 7-51).	The information is on Figure 7-12.
Figure 7-13	This figure does not show information described in text (p. 7-41), and the information is not on another figure.	This figure is correctly referenced in Section 7.4.3.
Figure 7-14	Does not exist in the MRP.	The information is on Figure 7-9.
Figure 7-15	Does not exist in the MRP.	The information is on Figure 7-10.
Figure 7-16	Does not exist in the MRP, but it is not clear whether or not this figure # is referred to anywhere in the text of the MRP.	
Figure 7-17	Does not exist in the MRP.	The information is on Figure 7-11.

RECOMMENDATIONS:

The Division should not approve the midterm review.