0021

File

May 14, 1985

TO: Coal File, Inspection and Enforcement Folder

FROM: Sandy Pruitt, Mining Field Specialist SP

RE: Des-Bee Dove Mine, Utah Power and Light Company, ACT/015/017, Folder #7, Emery County, Utah

DATE:	April 24, 1985
TIME:	9:00 a.m. - 3:30 p.m.
WEATHER:	Fair, cool
COMPANY OFFICIAL:	Larry Guymon
FEDERAL OFFICIAL:	Charles Botdorf
STATE OFFICIAL:	Sandy Pruitt

Compliance With Permanent Performance Standards

UMC 771 et al Permits

Utah Power and Light has not obtained any new mine plan modifications since the last quarterly inspection was completed March 21, 1985. Larry Guymon mentioned that they expect to obtain the federal mine permit soon.

The March 7, 1985, conditional approval of erosion and control plans for the Des-Bee-Dove/Wilberg connection road requires inspections of 22 drainage culverts during May, July and September 1985 and 1986. Another condition requires the submittal of a schedule for maintenance procedures on the road within 30 days of permit approval. Larry Guymon indicated that the culvert inspections would be started on May 15, 1985. This will comply with condition #3 of the February 7, 1985 plans. A maintenance procedures schedule should then be submitted within 30 days of the mine permit approval in accordance with condition 5.

UMC 817.11 Signs and Markers

A mine identification sign is posted at the permit area along the mine access road and at the mine sediment pond. Perimeter markers were clearly visible. A subsoil marker was posted on the stockpile of material excavated from the mine sediment pond.

UMC 817.51-.57 Hydrologic Balance

Sediment accumulated from flooding last fall was removed from the drainage channel inlet to the mine sediment pond and disposed into the Wilberg waste rock disposal site. Emery Mining Corporation also constructed a series of catchment basins in the drainage channel to trap sediments before the culvert under the road. The deposition of coal fines, oil and sediment in the drainage channel directly above these basins was very limited, probably due to the series of natural basins and water falls inbetween the mine and the sediment pond. The new basins will minimize sediment accumulations in the sediment pond and reduce the required cleaning frequency.

A drainage containment berm around the stockpile of material excavated from the sediment pond was well maintained and functionally adequate. The small catch basin downstream from the water tank yard had been maintained and a strawbale at the discharge point replaced since the last inspection.

The section of the mine access road just past the gate is banked to the inside to direct runoff to a drainage ditch which drains into a small catch basin and series of strawbales located at the bottom of the hill. Drainage of a section of the road bypassed this treatment facility flowing down an old access road to the Pre-Act loadout area located above the water tank. Minor rills had formed along the access road and at the release point onto the adjacent undisturbed area. To minimize erosion from the road drainage and provide better sediment control, Larry Guymon committed to construct a 6 inch to 1 foot high berm across the old access road to divert road drainage toward the strawbales at the bottom of the hill. Sediment accumulated behind the strawbales at the bottom of the hill should be removed and the bales replaced if necessary to function at full capacity.

On November 13, 1984, EMC dewatered the mine sediment pond, 1.9 acre feet or 619,117 gallons, to repair a leak in the underdrain valve. Analytical results of discharge samples obtained on November 13, 1984 indicated TDS levels at 7,071 mg/l at 11:20 a.m. and 7,419 mg/l at 1:25 p.m. The TSS level in the discharge sample at 1:25 p.m. was 143 mg/l. The mine sediment pond was dewatered again in February and early March 1985 to remove accumulated sediments. Every discharge sample analyzed contained an excess of the NPDES permit limitation of 700 mg/l TDS, at levels ranging from 5,296 to 13,004 mg/l. TSS levels also exceeded the NPDES maximum limitation of 35 mg/l, on February 20, 1985 at 83 mg/l and March 5, 1985 at 126 mg/l. A sample obtained February 19, 1985 containing 6,528 mg/l TSS was reportedly due to a sampling error. Copies of the 1984 analytical results examined at the mine office were received by EMC on November 26, 1984. In accordance with UMC 817.52 (b)(1)(ii) DOGM should have been notified of the violations by December 1, 1984. The latest analysis of the series of dewatering discharges which occurred from February 19, 1985 to March 14, 1985 was received on March 27, 1985. Therefore, each violation of the NPDES permit effluent limitations should have been reported to DOGM no later than April 2, 1985. The fourth quarter 1984 NPDES report submitted to DOGM on January 9, 1985 reports one sample from the dewatering operation containing 7,071 mg/l TDS. The first quarter 1985 NPDES report submitted to DOGM on April 9, 1985 recorded the excess TDS and TSS limits in the dewatering discharge. Neither report commented on the violations. NOV #N85-2-6-1 was warranted, by this inspection of the analytical reports, for the failure to notify the

Division of Oil, Gas and Mining (DOGM) of noncompliance with NPDES effluent limitations within 5 days of receipt of analytical results, UMC 817.52 (b)(1)(ii). The NOV cites results received November 26, 1984 of the Des-Bee-Dove sediment pond discharge on November 13, 1984 and results received up to March 27, 1985 for sediment pond discharges on February 19, 20, 22 and 28, 1985 and on March 4, 5, 6 and 14, 1985.

For abatement of NOV #N85-2-6-1 a copy of the analytical results must be forwarded concurrently with a written notification of noncompliance to the DOGM no later than April 29, 1985. The letter notifying the Division of the exceeded effluent standards was submitted to DOGM in abatement of the NOV but copies of the analytical results were not submitted with the letter as required. On May 3, 1985, Utah Power and Light submitted the required data for the two sediment pond discharges on November 13, 1984 and February 20, 22, 28, and March 4, 5, 6, and 14, 1985. NOV #N85-2-6-1 was terminated effectively that date.

Upon review of the Des-Bee-Dove sediment pond discharge data from 1983 to present, it is apparent that every discharge has exceeded the TDS limitation set by State Health. A reason for this is evident by the analytical results of two natural springs draining into the mine sediment pond which contributes up to 1300 mg/l TDS with flows approximately 1 gpm. There are also small seeps inside the southern pond embankment which contribute TDS ranging from 3,516 to 7,206 mg/l. Samples of standing water in the sediment pond were obtained near these seeps on February 27, and March 6, 1985, and analyzed to contain 85,818 mg/l and 76,644 mg/l TDS respectively. The natural background contributions accumulate with the relatively minor levels of TDS contributed from mine area runoff, such that it is unlikely that the 700 mg/l NPDES permit limitation could be met. In a telephone conversation on May 3, 1985, Chris Shingleton, Utah Power Light Company, indicated that during a meeting on May 1, 1985, State Health agreed that the limitations could not be met. The TDS limitation should be changed to more accurately reflect the background conditions.

Emery Mining Corporation has taken measures to control salt contributions from the mine area. A salt stockpile previously located within a disturbed area drainage ditch was removed from the mine site. EMC plans on constructing a salt storage bin to segregate the salt stockpile from mine area runoff. Salt application rates during snow removal operations should more strictly controlled.

UMC 817.61-.68 Use of Explosives

Larry Guymon reported that no surface blasting has been conducted within the Des-Bee-Dove mine permit area this year.

UMC 817.71-.74 Disposal of Underground Development Waste

Under direction by the Mine Safety and Health Administration (MSHA), Emery Mining Corporation is removing accumulated waste rock from the Des-Bee Dove Mines and ash from the Bee Hive Mine fire located along the first north main. Temporary stockpiles of the waste rock and ash are scattered over the entire mine area for haulage off site to the Wilberg waste rock disposal Cell #3.

UMC 817.89 Disposal of Noncoal Wastes

Mine waste materials also being removed from the mine under MSHA direction are scattered all over the mine area in temporary stockpiles for haulage to the Hunter landfill. Larry Guymon mentioned intentions to modify the approved permanent trash disposal site in the mine plan from the Hunter Plant landfill to the American Kinsfolk landfill located in Huntington.

Spillage from the PCB transformers located behind the warehouse is contained by a metal basin secured beneath the transformers in compliance with the EPA standards.

UMC 817.111-.117 Revegetation

Emery Mining Corporation has discontinued the seeding project at the Des-Bee-Dove mine for the season. The downslope from the parking lot/bathhouse pad is the only area within the Des-Bee-Dove mine yard that was seeded this year. Grass germination was already apparent.

There is limited revegetation success on the subsoil stockpile located adjacent to the mine sediment pond which was seeded in fall of 1984 or along the mine Des-Bee-Dove/Wilberg mine junction road shoulders which were seeded when the road was first constructed in 1982. The borrow area for the road construction which is located at the junction of the connection road and the Des-Bee-Dove mine access road is also void of vegetation and erodible.

UMC 817.150-.176 Roads

As mentioned above road drainage from the section of mine access road by the gate should be diverted into the strawbale treatment facility at the bottom of the hill by a berm across the Pre-Act loadout access road. The strawbale treatment facility should also be maintained to function as designed.

The drainage control measures inspected along the Des-Bee-Dove/Wilberg Mine junction road were well maintained and appeared functional. Two obstructed culverts, cited in NOV #N84-2-22-1, are only partially clear but functional. Larry Guymon reported that BMW would be contracted to clear the hardened sediments in the culverts.

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cc: Larry Guymon, EMC
Donna Griffin, OSM
Joe Helfrich, DOGM
John Whitehead, DOGM

Statistics: See Deer Creek Mine memo dated May 2, 1985
0242Q-07-11