



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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28 August, 1991

TO: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Hugh Klein, Reclamation Hydrologist 

RE: Proposed Cleaning Procedures for Deer Creek, Cottonwood North, and Cottonwood South Sediment Ponds, Deer Creek and Cottonwood-Wilberg Mines, ACT/015/018 and ACT/015/019, Folder #2 Emery County, Utah

SYNOPSIS

In a 15 August 1991 letter to the Division, PacifiCorp proposed to clean the sediment pond at the Deer Creek Mine, and the North and South pond at the Cottonwood-Wilberg Mine. A letter outlining the procedure for each pond has been submitted. This is noted because both letters for the Cottonwood ponds have the Deer Creek Mine identification number on them. However, this author believes this is probably a typographical error and will address the ponds by the description of text rather than the identification number.

ANALYSIS

The text within each letter clearly describes the procedure PacifiCorp proposes to use for cleanout of the ponds. In general, the procedure details that the ponds are to be bypassed during cleaning, water monitoring will be handled in a manner conforming to present NPDES requirements, and areas used as temporary sediment basins will be reclaimed to pre-cleaning conditions. PacifiCorp has also enclosed drawings of the temporary sediment basin, and has scheduled cleaning for a time that is not usually expected to have serious precipitation events.

PacifiCorp plans to haul the pond sludge to a containment area at its Waste Rock Site. In addition, water decanted from the Cottonwood-Wilberg South Pond (in order to drain the pond for cleaning) and any excess water that can not be handled by the temporary sediment basin associated with the cleaning of the Deer Creek Sediment Pond would be hauled to the Waste Rock Site.

The containment area for pond sludge and what will be done with decant water and possibly excess water during a precipitation event are of great concern. This concern stems from the need to minimize water and/or other semi-liquid materials being placed on a refuse pile. Failure to minimize uncontrolled drainage on a refuse pile is against Division regulations and could have other implications (such as toxic forming materials).

RECOMMENDATIONS

- 1) Before sediment pond cleaning is allowed to commence, PacifiCorp should clarify plans for pond sludge, i.e. exactly where is the pond sludge drying/containment area and how (if needed) is it to be constructed?
- 2) In addition to recommendation 1, specific plans for water (decant and/or runoff) hauled to the Waste Rock Site are needed. These plans will aid in answering questions raised above about uncontrolled drainage and the potential formation of toxic materials.
- 3) PacifiCorp should be made aware of these questions as soon as possible because the Cottonwood-Wilberg North Sediment Pond is scheduled for cleaning to start on 4 September 1991.