



file 015/025 #2

January 11, 1989

0004

TO: John Whitehead, Permit Supervisor

FROM: Bill Warmack, Reclamation Specialist *BW*

RE: MRP Amendment Response to TDN #X-88-02-107-11TV3 and NOV #88-30-6, Alternative Sediment Control Areas, CO-OP Mining Company, Bear Canyon Mine, ACT/015/025-88D, Folder #2, Emery County, Utah

2

Synopsis

The Division received an amendment proposal at the Salt Lake office on December 28, 1988, regarding several disturbed areas that were addressed in Ten-Day-Notice #X-88-02-107-11TV3 and State Violation #88-30-6-3. The proposal is in reference to the treatment of drainage from small disturbed areas that do not pass through a sedimentation pond:

1. outslope bank of upper storage yard
2. area north of No. 1 portal
3. ballpark/topsoil storage area
4. Blind Canyon Intake portal
5. Upper Bear Canyon Intake portal

For areas #1, 2, and 3, silt fences will be installed and maintained as alternative sediment controls. However, for the two intake breakouts (items #4 and 5), specific controls were not addressed since the operator's representative felt that the inward slope would prevent any disturbed runoff from leaving the portal areas.

Analysis

According to UMC 817.42, all surface drainage from a disturbed area shall be passed through a sedimentation pond or treatment facility before leaving the permit area. However, the Division may grant exemptions for small areas provided the operator demonstrates, by the use of alternative sediment control measures, that all applicable state and federal effluent limitations will be met or that the drainage will not degrade the quality of the receiving waters.

The operator's representative has committed to installing silt fences in strategic locations to treat the drainage from areas #1, 2, and 3 above. Although adequate, I feel Mr. Mangum is being too specific, especially since Mr. Hansen has made arrangements to install straw bales at the ballpark/topsoil area (conversation with Mr. Hansen on 1/6/89). Therefore, a more generic approach should be taken to list several possible approved alternatives from which an appropriate method will be chosen.

Concerning the two intake breakouts, Mr. Mangum has suggested that the disturbed drainage from these areas will not co-mingle with any

undisturbed drainage system primarily because the gradient slopes 2-2 1/2 percent inward towards the mine. However, no reference has been made as to the extent of the disturbed area (is there a pad present, or are the breakouts at the face of the cliff?). Also, would the additional influx of water hamper present mining operations and necessitate further pumping? (how much drainage would pass through the breakouts?)

Finally, one other area that was overlooked by myself and Mr. Mangum is the present topsoil pile across from the mine office/scale house. As defined, the topsoil pile is a disturbed area and should pass through a treatment facility. The topsoil pile is well vegetated and is contained within a berm, however, any drainage that should happen to leave the area would flow directly into Bear Creek via a culvert. Therefore, the topsoil pile should also be considered for an SAE as well even though alternative controls are in place.

Further, Mr. Mangum is reminded that all areas approved for SAE's must be maintained until it can be demonstrated that the applicable effluent limitations and/or vegetation rate of success are such that alternative sediment controls are no longer needed.

Recommendations

A. I recommend that a conditional approval be granted for areas #1, 2, and 3 with the following conditions:

1. Address the sediment control methods in a more general fashion unless silt fences are to be installed throughout the site
2. Supply an updated Hydrology map depicting the placement of the newly constructed sediment control structures.

B. I also recommend denial of the proposal for areas #4 and 5. The two breakouts have not been adequately addressed, specifically regarding the amount of drainage that will be anticipated and the amount of disturbance that has occurred. Cross sections and plan views of the areas should be submitted so that a consonant solution may be achieved.