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May 3, 2002

TO: Internal File

FROM: Michael J, Suflita, Senior Reclamation/Hydrologist

RE: Fuel Containment Enclosure, Co-Op Mining Company, Bear canyon Mine, C/015/025-AM02E

SUMMARY:

On April 9, 2002 the Division received a proposed amendment, which included three elements. First, is the construction of a concrete retaining structure to contain spills from fuel tanks, second is a revision to the configuration of the conveyor belt system, and third is elimination of an underground water monitoring point. This document is a review of the amendment and there are deficiencies.

TECHNICAL ANAYLSIS:

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:

Ground-water monitoring

The amendment proposes to remove an in-mine groundwater monitoring point designated DH-1A. The reason is the mining has progressed through the area where the well is located and is no longer safe to access. This is a normal part of the mining and monitoring work and removal of the monitoring point is approved.

Water quality standards and effluent limitations

The construction of a Fuel Containment Structure is described on page 3A-8. This structure is intended to correct the present situation where spills from any of the three tanks could exceed the capacity of the earthen berm and the spill would flow into Sediment Pond A. Basically, the Spill Protection Control and Containment Plan, SPCC Plan, is being revised to separate the disturbed area hydrologic ditches, diversions, and sediment ponds from possible spilled materials.

There is some confusion on how the spill containment structure is designed. Plate 2-4C shows a five-sided structure and text describes the walls as being 2 ft. 6 in. high. It's further described as holding 19,000 gallons and occupying 10,000 sq. ft. 19,000 gallons equals 2540 cubic feet. When that number is divided by 2.5 feet, the result is 1,016 sq. ft., NOT 10,000 sq. ft. Also, there is no indication of how the holding capacity was determined. That is, was the volume of the two other tanks below the structure sides subtracted from the total volume of the structure? Also, was the required freeboard included in the structure? The Operator needs to include a simple drawing indicating the overall interior and exterior dimensions of the structure. All tank diameters need to be shown. In addition, the capacity calculations need to be included to show all necessary factors were considered in the structure design. The structure description is not complete in other respects. The Operator needs to indicate how the spilled materials will be removed, where the materials will go, and whether the pipe (assuming that's how the materials are removed) is locked.

Sediment control measures

The amendment provides a new Figure7K-1, Typical Conveyor Pan Structure. The change from the old figure is the provision of "Open for Service" area on the catwalk side of the conveyor belt. Formerly, the conveyor was completely enclosed, which did not allow for maintenance access to the conveyor belt, rollers, and dust catch pan. The enclosure of the conveyor is intended to minimize coal dust being blown from the belt into the drainage below. This change is necessary and appropriate and is approved.

Findings:

Information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Prior to approval, the Permittee must provide the following in accordance with:

R645-301-751, The Operator needs to include a simple drawing indicating the overall interior and exterior dimensions of the structure. All tank diameters need to be shown. In addition, the capacity calculations need to be included to show all necessary factors were considered in the structure design. The Operator needs to indicate how the spilled materials will be removed, where the materials will go, and whether the pipe (assuming that's how the materials are removed) is locked.

RECLAMATION PLAN

BONDING AND INSURANCE REQUIREMENTS

Regulatory Reference: 30 CFR Sec. 800; R645-301-800, et seq.

Analysis:

Determination of bond amount

The size and configuration of the fuel containment enclosure has not been provided. Without that information it's not possible to determine the additional bond amounts. The Operator must provide a drawing showing the inside and outside dimensions of the enclosure, wall and base thickness, fuel removal method, pipeline (assuming one is used), possible secondary containment structures, and other data relevant to operation of the fuel containment enclosure.

Findings:

Information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Prior to approval, the Permittee must provide the following in accordance with:

R645-301-830, The Operator must provide a drawing showing the inside and outside dimensions of the enclosure, wall and base thickness, fuel removal method, pipeline (assuming one is used), possible secondary containment structures, and other data relevant to operation of the fuel containment enclosure.

RECOMENDATION:

The amendment should not be approved in its present form. The enumerated deficiencies must be cleared up first.