

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

June 7, 2005

TO: Internal File

THRU: D. Wayne Hedberg, Permit Supervisor

FROM: James D. Smith, Environmental Specialist, Team Lead

RE: Lead monitoring at site SBC-9A, Co-Op Mining Company, Bear Canyon Mine, C/015/0025, Task #2127

SUMMARY:

On January 14, 2003, a 130 ft x 20 ft x 20 ft roof fall in the 1st North section of the Bear Canyon #1 Mine (Hiawatha seam) buried a battery-powered coal hauler, an electrical distribution box, and a shop trailer. After MSHA and the Permittee investigated the roof fall, all remaining equipment was removed from the section and the area was sealed with MSHA approved mine seals. The permittee notified the Division concerning the incident on January 15, 2003 during the regular monthly inspection. An amendment was submitted for the abandonment of waste underground, i.e., the mining equipment. That amendment was given final approval in a letter dated August 16, 2004.

In a letter dated June 4, 2004, Darrel B. Leamaster, District Manager for the Castle Valley Special Service District (CVSSD), notified the Division that they had written the EPA to express concerns about the abandoned equipment. Of particular concern was the 8,768 lbs of lead in the batteries and its proximity to Big Bear Spring.

On August 4, 2004, the Division met with representatives of CVSSD and other water users, the Division of Drinking Water (DDW), and the Permittee to discuss this and related issues. At the meeting, Kate Johnson of DDW stated that distribution systems need to be wary of lead and copper. Based on Ms. Johnson's remark, the Division initially requested that both lead and copper be added to the mine's monitoring plan. The Bear Canyon and CVSSD water systems are required by DDW to analyze for lead and copper, although less frequently than quarterly. As far as is known to the Division, there is no significant source for copper inside the mine or in the water system before it reaches SBC-9A; therefore the Division sees no benefit or productive purpose in quarterly monitoring for copper at SBC-9A and SBC-4 and has dropped the request for monitoring of this parameter. However, the Division emphasizes that the issue of monitoring for copper can be reopened if new information indicates that monitoring of this parameter at SBC-9A and SBC-4 is necessary.

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Permittee's Action		DOGM's Action	
Initial submittal, Abandoned Equipment	05/14/2003	Tech Memo, Task # 1254	06/30/2003
Response to Task # 1254	09/10/2003	Tech Memo, Task # 1696	12/12/2003
Response to Task # 1696	05/03/2004		
Received fax of copy of letter Co-Op sent to EPA	05/28/2004	Conditional approval, Task # 1934	06/23/2004
Clean copies	08/12/2004	Final approval, Abandoned Equipment	08/16/2004
		Letter to Permittee requesting modification of water-monitoring plan.	08/27/2004
Response to request	11/26/2004	Tech Memo, Task # 2081	12/10/2004
		Deficiency Letter	12/10/2004
		TA - Task # 2081	12/30/2004
Response to TA # 2081	01/19/2005	Tech Memo, Task # 2127	06/07/2005
		Conditional approval, Task # 2127	06/07/2005

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, -300-147, -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:

Groundwater Monitoring

The Division specified additional monitoring at SBC-4 because of clear and reasonable concerns from the water users regarding potential impacts to this domestic water supply. Lead has been included in the potential contaminants listed on page 7P-2, and added to Table 7.1-7 (Ground Water Quality Parameter List) for sites SBC-9A and SBC-4. Text on page 7-29 specifies that SBC-4 and SBC 9A will be monitored quarterly for lead.

Findings:

Hydrologic Information is sufficient to meet the requirements of the R645 Coal Rules.

RECOMMENDATIONS:

This amendment should be approved. The Master TA will be updated for this amendment.