

OGMCOAL - Hydrology Inspection Report from 11-30-2011

From: April Abate
To: knicoles@altoncoal.com
Date: 12/6/2011 11:05 AM
Subject: Hydrology Inspection Report from 11-30-2011
CC: OGMCOAL@utah.gov
Attachments: 11.30.2011_Coal Hollow_Hydrology Inspection.pdf; April Abate.vcf

Hi Kirk,

Here is your report that we discussed over the phone. This is still technically a draft since it appears Joe has not added his comments pertaining to wildlife yet. I still wanted to get this to you as quickly as I could.

Let me know if you have any additional thoughts on it or would like to have any further discussion.

Regards,

April

April A. Abate

Environmental Scientist III

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Starting Tuesday, September 6, 2011, our agency hours will be 8am-5pm, Monday-Friday.



State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

Inspection Report

Permit Number:	C0250005
Inspection Type:	TECHNICAL
Inspection Date:	Wednesday, November 30, 2011
Start Date/Time:	11/30/2011 10:00:00 AM
End Date/Time:	11/30/2011 3:30:00 PM
Last Inspection:	Tuesday, November 08, 2011

Representatives Present During the Inspection:	
OGM	April Abate
Company	Kirk Nicholes
Company	Larry Johnson
OGM	Joe Helfrich
OGM	Kenneth Hoffman
OGM	Amanda Daniels

Inspector: April Abate

Weather: Clear, Sunny 53F

InspectionID Report Number: 2943

Accepted by:

Permittee: **ALTON COAL DEVELOPMENT LLC**
 Operator: **ALTON COAL DEVELOPMENT LLC**
 Site: **COAL HOLLOW**
 Address: **463 North 100 West, Suite 1, CEDAR CITY UT 84720**
 County: **KANE**
 Permit Type: **PERMANENT COAL PROGRAM**
 Permit Status: **ACTIVE**

Current Acreages

635.64	Total Permitted
435.00	Total Disturbed
	Phase I
	Phase II
	Phase III

Mineral Ownership

- Federal
- State
- County
- Fee
- Other

Types of Operations

- Underground
- Surface
- Loadout
- Processing
- Reprocessing

Report summary and status for pending enforcement actions, permit conditions, Division Orders, and amendments:

Technical mine inspection addressing hydrology issues in the process of permitting and follow up pertaining to wildlife commitments. Two new Division hydrologists, Amanda Daniels and Ken Hoffman also toured the site. Ken Hoffman, will be co-hydrologist at the site.

Inspector's Signature:

April Abate,
Inspector ID Number: 60

Date Monday, December 05, 2011



REVIEW OF PERMIT, PERFORMANCE STANDARDS PERMIT CONDITION REQUIREMENTS

1. Substantiate the elements on this inspection by checking the appropriate performance standard.
 - a. For COMPLETE inspections provide narrative justification for any elements not fully inspected unless element is not appropriate to the site, in which case check Not Applicable.
 - b. For PARTIAL inspections check only the elements evaluated.
2. Document any noncompliance situation by reference the NOV issued at the appropriate performance standard listed below.
3. Reference any narratives written in conjunction with this inspection at the appropriate performance standard listed below.
4. Provide a brief status report for all pending enforcement actions, permit conditions, Divison Orders, and amendments.

	Evaluated	Not Applicable	Comment	Enforcement
1. Permits, Change, Transfer, Renewal, Sale	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Signs and Markers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Topsoil	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.a Hydrologic Balance: Diversions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.b Hydrologic Balance: Sediment Ponds and Impoundments	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.c Hydrologic Balance: Other Sediment Control Measures	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.d Hydrologic Balance: Water Monitoring	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.e Hydrologic Balance: Effluent Limitations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Explosives	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Disposal of Excess Spoil, Fills, Benches	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Coal Mine Waste, Refuse Piles, Impoundments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Noncoal Waste	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Protection of Fish, Wildlife and Related Environmental Issues	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Slides and Other Damage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Contemporaneous Reclamation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Backfilling And Grading	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. Revegetation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14. Subsidence Control	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. Cessation of Operations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16.a Roads: Construction, Maintenance, Surfacing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16.b Roads: Drainage Controls	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. Other Transportation Facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18. Support Facilities, Utility Installations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19. AVS Check	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20. Air Quality Permit	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21. Bonding and Insurance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
22. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4.a Hydrologic Balance: Diversions

Examined drainage ditch DD-2 adjacent to the topsoil haul road. Undisturbed drainage from areas northeast of the mine was initially reporting to Pond 2. The ditch has since been rerouted so that undisturbed waters are now conveyed to Lower Robinson Creek. A small segment of the ditch DD-2A still routes a small amount of undisturbed drainage to Pond 2. During the July 20, 2011 inspection, DOGM discussed with the operator stripping topsoil from the natural drainage channel and complete it as a ditch. During the Nov. 30th inspection, it was observed that the haul road was constructed at a width greater than what was being used. Subsequently, an 8 to 10 foot zone of disturbance was created. Drainage from this zone of disturbance runs down the haul road and does not currently drain to any ditch. Discussed with the operator either blading a ditch to collect drainage from this area and route it to ditch DD-2A or as an alternative, reclaim the excess width of the haul road that is not being used and eliminate the segment of DD-2A north of the haul road. There is no apparent function of ditch DD-2A on the north side of the haul road other than to collect undisturbed drainage. The permittee can reclaim these areas in accordance with their approved plan and then submit a notice to DOGM with an updated map showing the reclaimed areas and then no additional permitting action would be required. This would then eliminate the problem of routing even minor amounts of undisturbed drainage to Pond 2. ~ Another small area at the intersection of the top soil haul road and Lower Robinson Creek was evaluated. During the July inspection, it was discussed with the operator to blade a ditch into Lower Robinson Creek to collect the undisturbed drainage that flows into a small area that is considered a low spot where the haul road intersects the main road and Lower Robinson Creek. The ditch was bladed and currently routes undisturbed drainage to DD-2A adjacent to the culvert under the haul road, but the side of the ditch that is by outfall to Lower Robinson was blocked by a berm. This needs to be corrected by December 16, 2011 so that flow to the creek can be established. The Operator should also let the Division know by this date how they would like to proceed with either keeping ditch DD-2A to route drainage from the width of the haul road, or if reclaiming the width of the haul road and the north half of ditch DD-2A is to remain. ~It was observed that the south side of the spoils pile also requires the placement of a temporary ditch. Currently, there is no boundary between the existing spoils pile and the undisturbed area.

4.b Hydrologic Balance: Sediment Ponds and Impoundments

The Operator is currently in the process of responding to a deficiency letter addressing the management of alluvial groundwater in order to divert it away from the pits while mining. The deficiency letter dated October 28, 2011 requested additional information regarding the sump construction and a procedure to discharge the groundwater both to the sump and at the permitted outfall of Lower Robinson Creek. The outfall location where the operator was discharging from has already been approved by Dept. of Water Quality and is listed in the Coal Hollow UPDES permit as outfall 005. Upon inspection, the "sump" appeared to be an impoundment that was connected to a trench by a hose. The trench is used to collect the upgradient alluvial groundwater prior to the groundwater migrating to the mine pit highwalls. None of these structures should have been constructed without final approval of this amendment (Task #3935) from the Division. Although no discharge of groundwater was observed at the time of inspection, the operator admitted that discharges to Lower Robinson Creek via the permitted outfall was occurring. The Operator was told to stop discharging any groundwater until the deficiency response letter is submitted and final approval by the Division is granted. The Division explained to the Operator that until final approval of the alluvial groundwater management plan is in the Mining and Reclamation plan, discharging cannot continue. Based on inspection, the "sump" is actually an impoundment and therefore meets the regulatory criteria for impoundments. The alluvial groundwater management plan will need to address regulations that apply to impoundments for the sump collection system such as be designed, certified and inspected by a professional engineer. This structure will also be required to be depicted on a certified map in accordance with R645-301.521.124. The rules governing impoundment structures are found in R645-512.200, 240, - 514.310, 312, 515.200, 533.110, 542.500, 731.740, 731.750, 733.100, 210, 221, 225, 230. Because the sump meets the regulatory criteria for an impoundment structure, the deficiency response submittal will have to address the impoundment criteria for the sump. The Operator agreed to submitted a response to the deficiency letter by December 9, 2011

6. Disposal of Excess Spoil, Fills, Benches

The spoils pile was inspected and looked very good. The spoil was graded and sloped toward drainage ditch DD-4. The slope on the spoils pile was reported to be 1-2%.