



State of Utah

GARY R. HERBERT
Governor

SPENCER J. COX
Lieutenant Governor

Department of
Environmental Quality

Alan Matheson
Executive Director

DIVISION OF WATER QUALITY
Erica Brown Gaddis, PhD
Director

June 28, 2018

CERTIFIED MAIL
(Return Receipt Requested)

Mr. Kirk Nicholes
Environmental Specialist
Alton Coal Development, LLC
South and North Private Leases
463 North 100 West, Suite 1
Cedar City, Utah 84721

Subject: Compliance Evaluation Inspection
Alton Coal Development, LLC
South and North Private Leases, UT0025992

Dear Mr. Nicholes:

On June 8, 2018, the Division of Water Quality Completed a Compliance Evaluation Inspection of the Alton Coal Development, LLC – South And North Private Leases (Alton Coal). Attached are the results of the Compliance Evaluation Inspection. Within 30 days of receipt of this report, please provide a written response to the requirements and how the facility will address the deficiencies listed on page 6 of the inspection report. Please include your permit number on your correspondence.

Thank you for your time facilitating the inspection. If you have any questions or comments regarding this matter, please contact me at (801) 536-4394 or via e-mail at lshull@utah.gov.

Sincerely,

Lonnie Shull, Environmental Scientist
UPDES Surface Water Section

LS/blj

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Compliance Evaluation Inspection
Alton Coal Development, LLC
South and North Private Leases, UT0025992

Enclosures (4):

1. Alton Coal CEI Checklist (DWQ-2018-006734)
2. Alton Coal Dev 3560 (DWQ-2018-006735)
3. Alton Coal Dev 3560 SW (DWQ-2018-006736)
4. Alton Coal STW checklist (DWQ-2018-006737)

cc: Jeremy Roberts, Southwest Utah Public Health Dept., via email w/enclosure
Paul Wright, District Engineer, via email w/enclosure
Daron Haddock, DOGM, via email w/enclosure
Monique Bridges, UT DWQ, via email 3560 only

DWQ-2018-006733

**COMPLIANCE EVALUATION INSPECTION
ALTON COAL DEVELOPMENT, LLC
UPDES PERMIT NO. UT0025992
June 8, 2018**

Facility Contact and Address:

Facility Contact:	B. Kirk Nicholes	Responsible Official:	Larry Johnson
Position:	Env. Specialist	Position:	Mine Manager
Phone:	(435) 691-1551	Phone:	(435) 691-2983

Facility Name: Alton Coal Development, LLC – North Private Lease
Mailing Address: 463 North 100 West, Suite 1
Cedar City, Utah 84721

Physical Location: 2060 South Alton Road, Alton, Utah 84710.
Coordinates: Latitude: 37° 24' 24.02 N., Longitude: 112° 27' 12.47 W.

DESCRIPTION OF FACILITY

Alton Coal Development, LLC – Coal Hollow Project (CHP) is a surface coal mining operation located about three miles south of the town of Alton Coal. Approximately 1500 tons of coal is mined per day. The CHP consists of 636 acres of land, of which 435 is actively being mined. The Company has five discharge points. CHP was issued coverage under an individual UPDES permit.

DESCRIPTION OF DISCHARGE

CHP was granted multiple discharge points. The outfalls in the proposed UPDES permit are as follows:

<u>Outfall</u>	<u>Description of Discharge Point</u>
001	Storm water runoff from sediment pond #1 to Lower Robinson Creek, Latitude 37° 24' 13" N, Longitude 112°27'13"W.
001B	Storm water runoff from sediment pond #1B to Lower Robinson Creek, Latitude 37° 24' 11" N, Longitude 112°27'16"W.
002	Storm water runoff from sediment pond #2 to Lower Robinson Creek, Latitude 37° 24' 10" N, Longitude 112°27'16"W.
003	Ground water and storm water runoff from sediment pond #3 to Lower Robinson Creek, Latitude 37° 23' 51" N, Longitude 112°27'53"W.
004	Ground water and storm water runoff from sediment pond #4 to Sink Valley Wash, Latitude 37° 23' 01" N, Longitude 112°27'03"W.

- 005 Storm water runoff from sediment pond #5 to an unnamed tributary of Kanab Creek, Latitude 37° 25' 18.07" N and Longitude 112° 28' 35.82' W.
- 006 Storm water runoff from sediment pond #6 to an unnamed tributary of Kanab Creek, Latitude 37° 25' 12.32' N and Longitude 112° 28' 25.42' W.
- 007 Ground water and storm water runoff from sediment pond #7 to an unnamed tributary of Kanab Creek, Latitude 37° 25' 13.95' N. and Longitude 112° 28' 8.40' W.
- 008 Storm water runoff from sediment pond number 9 (sediment pond #8 discharges to sediment pond #9) to Kanab Creek, Latitude 37° 25' 12.46' N. and Longitude 112° 28' 1.42' W.

RECEIVING WATERS AND STREAM CLASSIFICATION

Lower Robinson Creek, Sink Valley Wash and Kanab Creek are classified as 2B, 3C and 4.

Class 2B – protected for secondary contact recreation such as boating, wading, or similar uses.

Class 3C – protected for nongame fish and other aquatic life, including the necessary aquatic organisms in their food chain.

Class 4 - protected for agricultural uses including irrigation of crops and stock watering.

SELF MONITORING AND EFFLUENT LIMITATIONS:

Per the permit, the facility is required to meet the following effluent limits at Outfalls 001, 001B, 002, 003 and 004.

Effluent Characteristics	Effluent Limitations				Monitoring Requirements	
	30 Day Average	7 Day Average	Daily Minimum	Daily Maximum	Sample Frequency	Sample Type
Flow, ¹ MGD	NA	² NA	NA	1.1 a/	Monthly	Measured
TSS, mg/L	25	35	NA	70	Monthly	Grab
Total Iron, mg/L	NA	NA	NA	1.0	Monthly	Grab
Oil & Grease, mg/L b/	NA	NA	NA	10	Monthly	Grab
TDS, mg/L	NA	NA	NA	1200	Monthly	Grab
TDS lbs/day c/	NA	NA	NA	2000	Monthly	Grab
pH, standard units	NA	NA	6.5	9.0	Monthly	Grab
Sanitary Waste d/	NA	NA	NA	None	Monthly	Visual
Oil and Grease, floating solids, visible foam, b/	NA	NA	NA	None	Monthly	Visual

¹ MGD: million gallons per day ² NA: not applicable

a/ For intermittent discharges, the duration of the discharge shall also be reported.

b/ In addition to monthly sampling for oil and grease, a visual inspection for oil and

grease, floating solids, and visible foam shall be performed at least monthly. There shall be no sheen, floating solids, or visible foam in other than trace amounts. If a sheen is observed, a sample of the effluent shall be collected immediately thereafter and oil and grease shall not exceed 10 mg/L in concentration.

c/ A limit of one ton (2000 lbs. per day) or 366 tons per year as a sum from all discharge points is required of the permittee, unless a concentration of 500 mg/L or less is achieved at all discharge points. If 500 mg/L or less is achieved at all discharge points, then no loading limit applies. If the permittee cannot achieve the 500 mg/L concentration requirement or the one ton per day or 366 tons per year loading limit, then the permittee will be required to remove salinity/TDS in excess of one ton per day or 366 tons per year by developing a treatment process, participating in a salinity off-set program, or developing some type of mechanism to remove the salinity/TDS. The selection of a salinity control method, if needed, must be approved by the Director of the Division of Water Quality and implemented within one year of the effective date of approval.

d/ There shall be no discharge of sanitary waste.

Per the permit, the facility is required to meet the following effluent limits at Outfalls 005, 006, 007 and 008.

Effluent Characteristics	Effluent Limitations				Monitoring Requirements	
	30 Day Average	7 Day Average	Daily Minimum	Daily Maximum	Sample Frequency	Sample Type
Flow, ¹ MGD	NA	² NA	NA	0.117a/	Monthly	Measured
TSS, mg/L	25	35	NA	70	Monthly	Grab
Total Iron, mg/L e/	NA	NA	NA	1.0	Monthly	Grab
Total Selenium, mg/L e/	0.0046	NA	NA	0.020	Monthly	Grab
Oil & Grease, mg/L b/	NA	NA	NA	10	Monthly	Grab
TDS, mg/L	NA	NA	NA	1200	Monthly	Grab
TDS lbs/day	NA	NA	NA	2000c/	Monthly	Grab
pH, standard units	NA	NA	6.5	9.0	Monthly	Grab
Sanitary Waste d/	NA	NA	NA	None	Monthly	Visual
Oil and Grease, floating solids, visible foam, b/	NA	NA	NA	None	Monthly	Visual
Total Arsenic, mg/L	NA	NA	NA	NA	Monthly	Grab
Total Cadmium, mg/L	NA	NA	NA	NA	Monthly	Grab
Total Chromium, mg/L	NA	NA	NA	NA	Monthly	Grab
Total Copper, mg/L	NA	NA	NA	NA	Monthly	Grab
Total Mercury, mg/L	NA	NA	NA	NA	Monthly	Grab
Total Nickel, mg/L	NA	NA	NA	NA	Monthly	Grab
Total Lead, mg/L	NA	NA	NA	NA	Monthly	Grab
Total Silver, mg/L	NA	NA	NA	NA	Monthly	Grab
Total Zinc, mg/L	NA	NA	NA	NA	Monthly	Grab

Total Boron, mg/L	NA	NA	NA	NA	Monthly	Grab
¹ MGD: million gallons per day	² NA: not applicable					

- a/ For intermittent discharges, the duration of the discharge shall also be reported. This daily maximum flow limit shall apply to Outfall 008 only.

- b/ In addition to monthly sampling for oil and grease, a visual inspection for oil and grease, floating solids, and visible foam shall be performed at least monthly. There shall be no sheen, floating solids, or visible foam in other than trace amounts. If a sheen is observed, a sample of the effluent shall be collected immediately thereafter and oil and grease shall not exceed 10 mg/L in concentration.

- c/ A limit of one ton (2000 lbs per day) or 366 tons per year as a sum from all discharge points is required of the permittee, unless a concentration of 500 mg/L or less is achieved at all discharge points. If 500 mg/L or less is achieved at all discharge points, then no loading limit applies. If the permittee cannot achieve the 500 mg/L concentration requirement or the one ton per day or 366 tons per year loading limit, then the permittee will be required to remove salinity/TDS in excess of one ton per day or 366 tons per year by developing a treatment process, participating in a salinity off-set program, or developing some type of mechanism to remove the salinity/TDS. The selection of a salinity control method, if needed, must be approved by the Director of the Division of Water Quality and implemented within one year of that approval.

There shall be no discharge of sanitary waste.

- e/ Outfall 008 shall meet a total selenium limit of 0.0081 mg/L as a thirty day average and 0.0414 mg/L as a daily maximum, and for total iron a daily maximum limit of 2.16 mg/L.

NARRATIVE: I, Lonnie Shull from the Division of Water Quality, met with Kirk Nicholes Environmental Scientist and Drew Christensen, Mine Engineer to complete the 3560-3 inspection form the UPDES Inspection Checklist and the UPDES Storm water industrial checklist. Introductions were made and the purpose and scope of the inspection were explained. An on-site inspection of the facility was completed.

The facility had a copy of the current permit onsite. The contact information on the existing statement of basis was correct. The receiving waters listed in the permit are correct. All existing outfalls are listed in the permit.

Alton Coal has developed a Storm Water Pollution Prevention Plan (SWPPP). The Plan was reviewed during the inspection and was found to be adequate. However, it was missing coverage for the South lease area. While much of the active mining activity has stopped in this area, it still

includes the loadout area where the mined coal is loaded into haul truck for transport off site. Per *Part II.C.2* of the permit, a SWPPP is required to *identify all activities and significant materials, which may be reasonably expected to have the potential as a significant pollutant source*. The SWPPP onsite should be updated to include both the north and the south lease areas.

The facility has not discharged in over a year. As a result, there were no recent chain of custody forms to review. Mr. Nicholes stated that when he logs pH he takes a sample onsite and logs it on his phone. However, a review of the records indicated that the DMR from January 2016 was missing. Per *Part III.D* of the permit, *Monitoring results obtained during the previous month shall be summarized for each month and reported on a DMR Form (EPA No. 3320-1) or by NetDMR, post-marked no later than the 28th day of the month following the completed reporting period. If no discharge occurs during the reporting period, "no discharge" shall be reported*. Mr. Nicholes stated this was a no discharge month for the facility and that he would submit the DMR as soon as possible. The missing DMR form was submitted by E-mail on June 21, 2018.

An evaluation of the operations and maintenance was conducted. As a result of the inspection, it was concluded that the facility is being properly operated.

All of the treatment units and major pieces of equipment were considered to be in satisfactory condition at the time of the inspection. The main treatment process is settling ponds. These ponds settle fines and particulates. Water leaves the ponds via evaporation or overflow. Given the low amounts of precipitation the area has received over the past two years, they have not discharged.

A safety evaluation was also conducted. It was determined that the facility is being operated in a safe manner. The facility provides the proper person protective equipment for its employees including but not limited to hearing protection, gloves, rubber boots steel toes and eyewashes in labs.

Each outfall was checked. None of the outfalls were observed to be discharging on the day of the inspection.

DEFICIENCIES:

1. Failure to Submit DMR.
2. Failure to develop any or adequate SWPPP/SWMP

CORRECTIVE ACTIONS:

1. None. The missing form was submitted via e-mail on June 21, 2018
2. Have a copy of the SWPPP for both the North and the South Lease areas onsite and available.

RECOMMENDATIONS:

- 1). None.

Photos

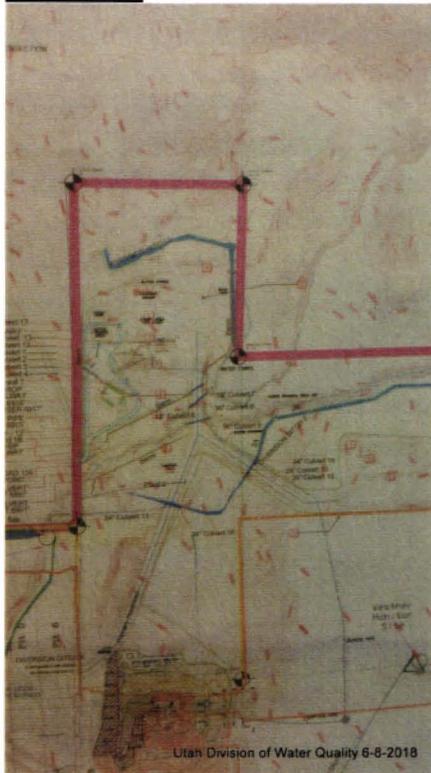


Photo 1. View of site map located in the facility field office.

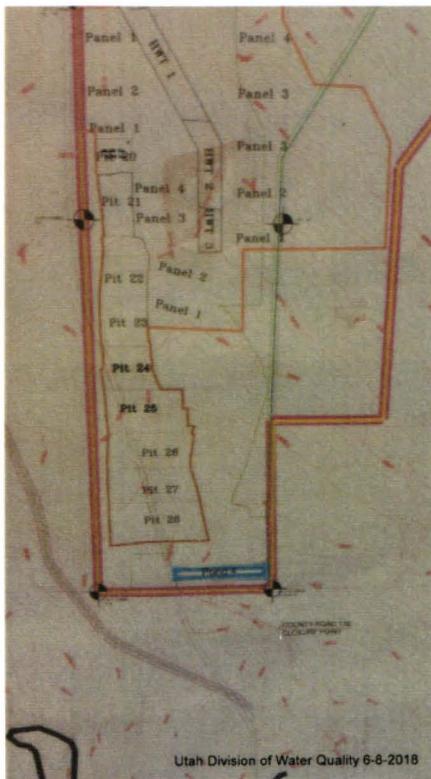
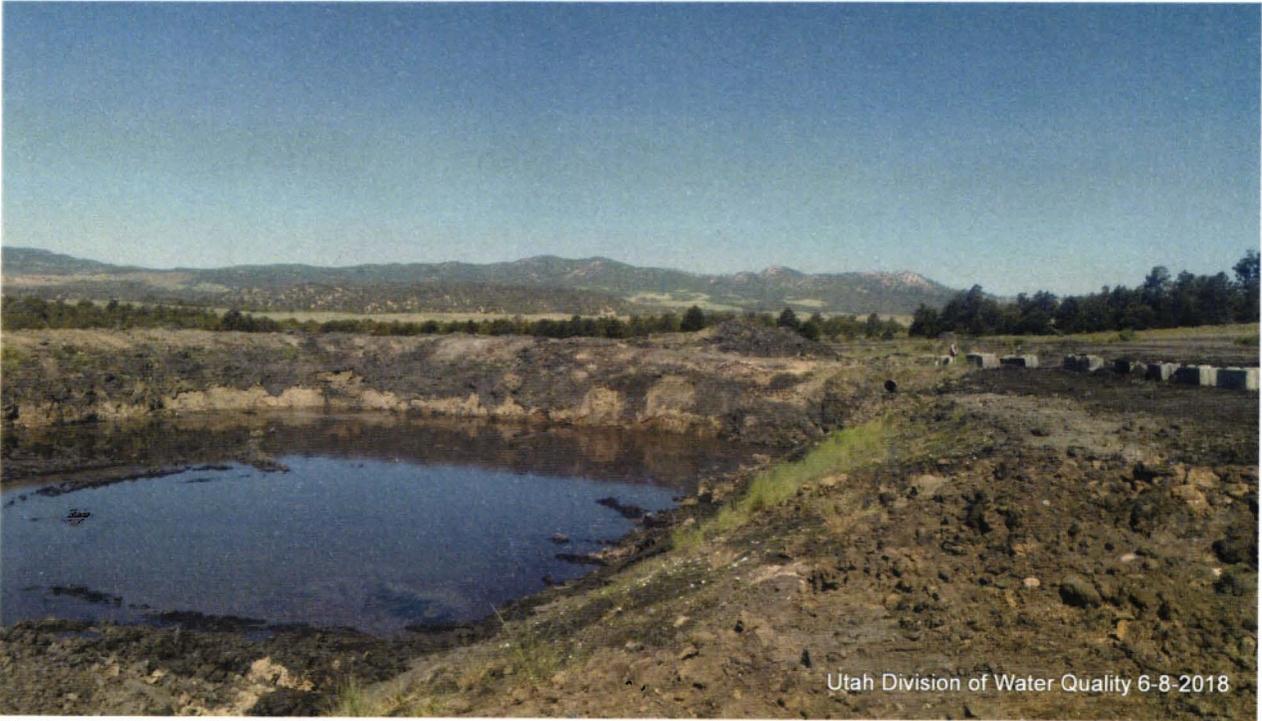


Photo 2. View of site map located in the facility field office.



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Photo 3. View of site map located in the facility field office.



Utah Division of Water Quality 6-8-2018

Photo 4. View of pond 1 located near the onsite field office. View looking north.



Photo 5. View of pond 1 located near the onsite field office. View looking south west.



Photo 6. View of pond 1B. The outfall is the stand pipe on the far side of the pond. Note the safety equipment located at the pond. This was noted at each pond. View looking South.

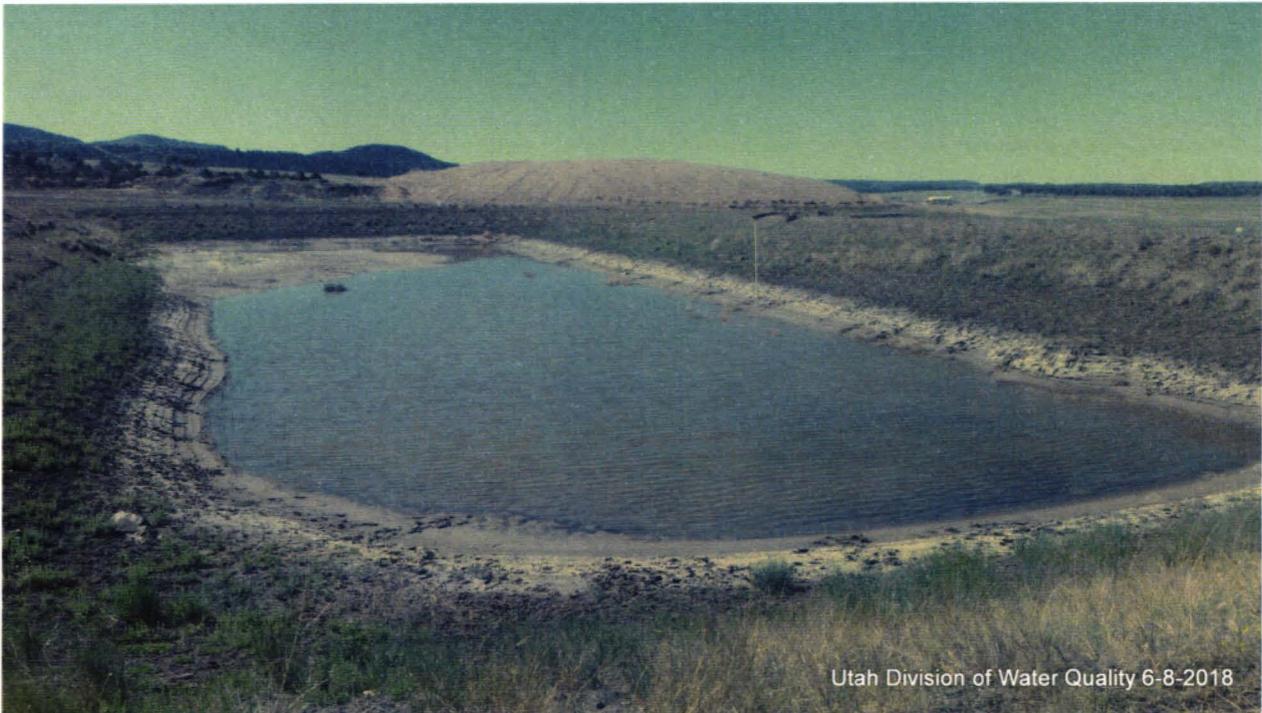


Photo 7. View of pond 2. View looking south east.



Photo 8. View of pond 3. The discharge is over the rock weir at the far side of the pond. View looking north west.



Photo 9. View of Pond 4. This pond is located on the far south end of the property. This area is in the process of being reclaimed. The area on the upper left above the pond is typical of the revegetation that has taken place on the mine site.



Photo 10. View of lower Robinson creek near pond 3.

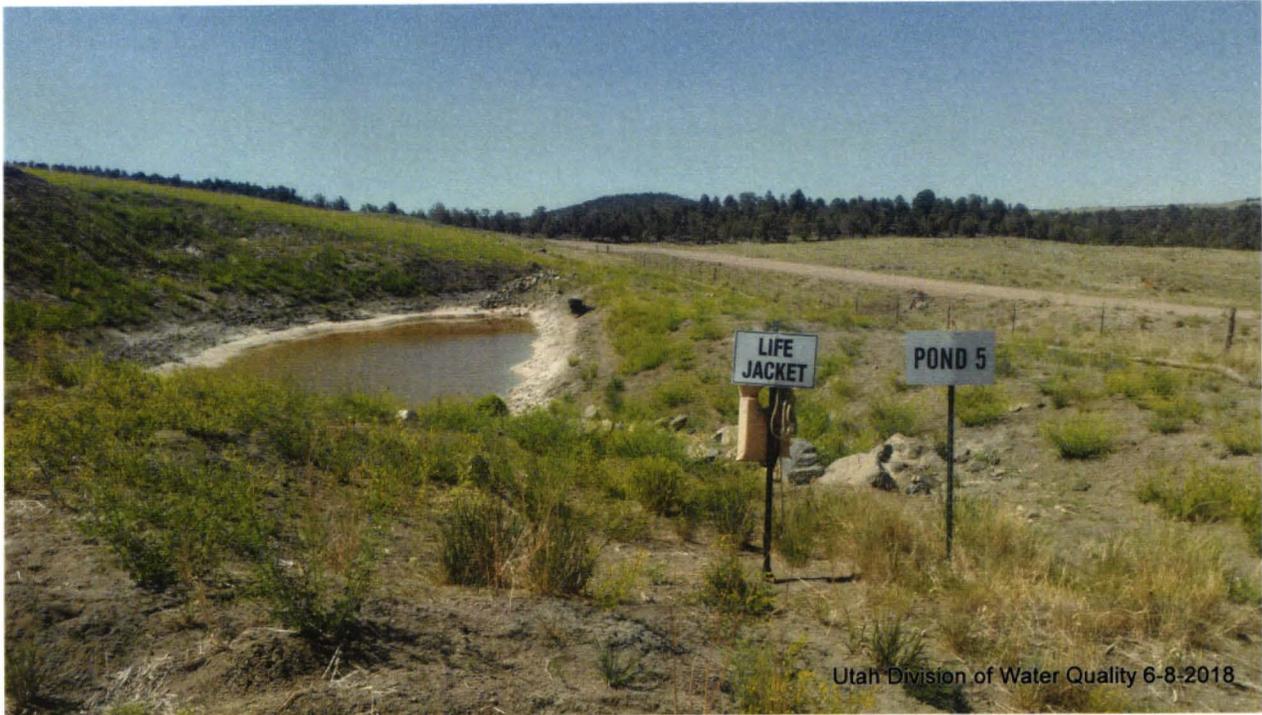


Photo 11. View of pond 5. View looking south.



Photo 12. View of pond 6. View looking east. Note the revegetation that has taken place on the former mine site.



Photo 13. View of Pond 7. This area is receiving ground water and storm water runoff. View looking south east.



Photo 14. View of pond 8. This area is receiving ground water from the active mining area and storm water runoff. View looking north.



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Photo 15. View of water from pond 8 being used as dust control on the mine site.



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Photo 16. View of Outfall 008 from pond 8.

USEPA REGION 8 NPDES LAGOON INSPECTION CHECKLIST

NPDES PERMIT #: UT0025992

INSPECTION DATE: 7-8-18

FACILITY: Allen Coal

I. PERMIT VERIFICATION

- YES NO N/A Inspection observations verify information contained in permit.
- Yes No N/A 1. Current copy of permit on site.
- Yes No N/A 2. Name, mailing address, contact, and phone number are correct in PCS. If not, indicate correct information on Form 3560.
 - 3. Brief description of the wastewater treatment plant:
Coal mine - open pit
- Yes No N/A 4. Facility is as described in permit. If not, what is different? _____
- Yes No N/A 5. EPA/State has been notified of any new, different, or increased loading to the WWTP.
Decrease
- Yes No N/A 6. Number and location of discharge points are as described in the permit.
- Yes No N/A 7. Name of receiving water(s) is/are correct. UN named washes
to Koub creek

Comments:

II. RECORDKEEPING AND REPORTING EVALUATION

- YES NO N/A Records and reports are maintained as required by permit.
- Yes No N/A 1. All required information is current, complete, and reasonably available.
- Yes No N/A 2. Information is maintained for the required 3 year period.
- Yes No N/A 3. Sampling and analysis data are adequate and include:
 - a. Dates, times, locations of sampling.
 - b. Initials of individual performing sampling.
 - c. Referenced analytical methods and techniques in conformance with 40 CFR Part 136.
 - d. Results of analyses and calibration.
 - e. Dates of analyses (and times if required by permit).
 - f. Initials of person performing analyses.
 - g. Instantaneous flow at grab sample stations.

check the load & Im1

- Yes No N/A 4. Sampling and analysis completed on parameters specified in permit.
- Yes No N/A 5. Sampling and analysis done in frequency specified by permit.
- Yes No N/A 6. Lagoon inspection logs are being completed at the frequency specified by permit.

Comments:

YES NO N/A **DMR completion meets the self-monitoring reporting requirements.**

Yes No N/A 1. Monitoring for required parameters is performed more frequently than required by permit. Parameter(s) _____

Yes No N/A 2. Analytical results are consistent with the data reported on the DMRs.

Yes No N/A 3. All data collected are summarized on the DMR.

Yes No N/A 4. Monthly, weekly, and/or daily average loading values are calculated properly and reported on the DMR. (Effluent loadings are calculated using effluent flow.)

Yes No N/A 5. The geometric mean is calculated and recorded for fecal coliform data.

Yes No N/A 6. Weekly and monthly averaging is calculated properly and reported on the DMR.

Yes No N/A 7. The maximum and minimum values of all data points are reported properly.

Yes No N/A 8. The number of exceedances column (No. Ex.) is completed properly.

Comments:

No discharge in past year

III. COLLECTION SYSTEM

YES NO N/A ~~Collection system properly maintained.~~

1. Collection system is (check one):
- Combined
 - Separate
 - Both

Yes No N/A 2. Procedures for sewer cleaning, including preventive maintenance schedules, are established and performed on time.

Yes No N/A 3. Sewer backups into basements occur during high flows. If yes, specify dates and briefly describe circumstances: _____

Yes No N/A 4. Manholes overflow during high flows. If yes, specify dates and briefly describe, including total volumes of each event and receiving waters: _____

- Yes No N/A 7. All treatment units, other than back-up units, are in service. If not, what and why?
8 settling Ponds 1 + 1a
- Yes No N/A 8. O&M manual available and up-to-date.
- Yes No N/A 9. Procedures for plant O&M, including preventive maintenance schedules, are established and performed on time.
- Yes No N/A 10. Adequate spare parts and supplies inventory (including flow meters) are maintained, as well as major equipment specifications and/or repair manuals.
- Yes No N/A 11. Up-to-date maintenance and repair records are kept for major pieces of equipment.
- Yes No N/A 12. Lagoon is being properly maintained.
 Yes No N/A a. Locks, gates, fences, and sign are intact.
 Yes No N/A b. Vegetation is mowed on the inside, outside slopes and top of dikes.
 Yes No N/A c. Outside toe of dikes show no evidence of seepage and/or rodent damage.
 Yes No N/A d. Inside slopes of dikes show no evidence of erosion and/or rodent damage.
 Yes No N/A e. Cattails and/or bushes and/or trees are not growing in the lagoons.
- Yes No N/A 13. Number of qualified operators and staff.
- | How many? | Certification Level |
|-----------|---------------------|
| _____ | _____ |
| _____ | _____ |
- Yes No N/A 14. Certification level meets State requirement?
- Yes No N/A 15. What procedures or practices are used to train new operators? _____

Comments:

V. SAFETY EVALUATION

- YES NO N/A **Facility has the necessary safety equipment.**
- Yes No N/A 1. Procedures are established for identifying out-of-service equipment. What are they?
Yes but not for work
- Yes No N/A 2. Personal protective clothing provided (safety helmets, ear protectors, goggles, gloves, rubber boots with steel toes, eye washes in labs).
- Yes No N/A 3. Laboratory safety devices (eyewash and shower, fume hood, proper labeling and storage, pipette suction bulbs) available.
- Yes No N/A 4. Plant has general safety structures such as rails around or covers over tanks, pits, or

wells. Plant is enclosed by a fence.

Yes No N/A

5. Portable hoists for equipment removal available.

Yes No N/A

6. All electrical circuitry enclosed and identified.

~~Yes No N/A~~

7. Chlorine safety is adequate and includes:

~~Yes No N/A~~

a. NIOSH-approved 30-minute air pack.

~~Yes No N/A~~

b. All standing chlorine cylinders chained in place.

~~Yes No N/A~~

c. All personnel trained in the use of chlorine.

~~Yes No N/A~~

d. Chlorine repair kit.

~~Yes No N/A~~

e. Chlorine leak detector tied into plant alarm system.

~~Yes No N/A~~

f. Ventilation fan with an outside switch.

~~Yes No N/A~~

g. Posted safety precautions.

Yes No N/A

8. Warning signs (no smoking, high voltage, nonpotable water, chlorine hazard, watch-your-step, and exit) posted.

Yes No N/A

9. Gas/explosion controls such as pressure-vacuum relief valves, no smoking signs, explosimeters, and drip traps present near anaerobic digesters, enclosed screening or degritting chambers, and sludge-piping or gas-piping structures.

Yes No N/A

10. Emergency phone numbers listed. *→ Rooms + Cell phone*

Yes No N/A

11. Plant is generally clean, free from open trash areas.

Yes No N/A

12. MSDS sheets, if required, are accessible by employees. *Entered*

Comments:

VI. FLOW MEASUREMENT

YES NO N/A

Flow Measurement Meets the Requirements and Intent of Permit

Type of primary flow measurement device: Bucket method

Yes No N/A

1. Primary flow measuring device is properly installed and maintained.

Where? _____

Yes No N/A

2. Flow measured at each outfall. Number of outfalls: _____

Yes No N/A

3. Frequency of routine inspection of primary flow device by operator: _____/day

Yes No N/A

4. Frequency of routine cleaning of primary flow device by operator: _____/week.

Yes No N/A

5. Influent flow is measured before all return lines.

Yes No N/A

6. Effluent flow is measured after all return lines.

Yes No N/A

7. Proper flow tables are used by facility personnel.

Yes No N/A

9. Flow measurement equipment adequate to handle expected ranges of flow rate.

Comments:

VII. PERMITTEE SAMPLING EVALUATION

YES NO N/A

Sampling meets the requirements and intent of the permit.

Yes No N/A

1. Samples are taken at sampling location specified by permit.

Yes No N/A

2. Locations are adequate for representative samples.

Yes No N/A

3. Flow proportioned samples are obtained.

Yes No N/A

4. Permittee is using method of sample collection required by permit.

Required method: _____

If not, method being used is:

- Grab
- Manual
- Automatic composite

5. Sample collection procedures adequate and include:

- a. Sample refrigeration during compositing.
- b. Proper preservation techniques.
- c. Containers in conformance with 40 CFR 136.3.

Specify any problems: _____

Yes No N/A
 Yes No N/A
 Yes No N/A

Comments:

Hand held pH meter
use probe as long as possible



United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., ICIS)

Transaction Code N	NPDES U T 0 0 2 5 9 9 2	yr/mo/day 1 8 0 6 0 8	Inspection Type C	Inspector S	Fac. Type 2
Remarks					
Inspection Work Days 0 5 0					
Facility Self-Monitoring Evaluation Rating 3					
BI N					
QA N					
Reserved					

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Alton Coal Development, LLC - South and North Private Leases 3 miles South of Alton Utah	Entry Time/ Date 9:30 6/8/2018	Permit Effective Date 9/1/2016
	Exit Time/ Date 11:45 6/8/2018	Permit Expiration Date 7/31/2018
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Kirk Nicholes, Environmental Specialist (435) 691-1551	Other Facility Data (e.g., SIC NAICS, and other descriptive information)	
Name, Address of Responsible Official/Title/Phone and Fax Number Larry Johnson, Mine manager Alton Coal Development, LLC 463 North 100 West, Suite 1 Cedar City, Utah 84721 (435) 691-2983	Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedule	<input type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water	
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes E 0 0 1 2	SEV Description Failure To Submit Dmrs
	Failure To Submit Dmrs

Name(s) and Signature(s) of Inspector(s) Lonnie Shull	Agency/Office/Phone and Fax Number(s) Utah Division of Water Quality (801) 536-4394	Date: 6/28/18
Name and Signature of Management Q A Reviewer Matt Garn	Agency/Office/Phone and Fax Number(s) Utah Division of Water Quality (801) 536-4381	Date: 6-28-2018

INSTRUCTIONS

Section A: National Data System Coding (i.e., ICIS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A Performance Audit	X Toxics Inspection	6 IU Non-Sampling Inspection with Pretreatment
B Compliance Biomonitoring	Z Sludge - Biosolids	7 IU Toxics with Pretreatment
C Compliance Evaluation (non-sampling)	# Combined Sewer Overflow-Sampling	! Pretreatment Compliance (Oversight)@
D Diagnostic	\$ Combined Sewer Overflow-Non-Sampling	Follow-up (enforcement)
F Pretreatment (Follow-up)	+ Sanitary Sewer Overflow-Sampling	{ Storm Water-Construction-Sampling
G Pretreatment (Audit)	& Sanitary Sewer Overflow-Non-Sampling	} Storm Water-Construction-Non-Sampling
I Industrial User (IU) Inspection	\ CAFO-Sampling	: Storm Water-Non-Construction-Sampling
J Complaints	= CAFO-Non-Sampling	~ Storm Water-Non-Construction-Non-Sampling
M Multimedia	2 IU Sampling Inspection	< Storm Water-MS4-Sampling
N Spill	3 IU Non-Sampling Inspection	- Storm Water-MS4-Non-Sampling
O Compliance Evaluation (Oversight)	4 IU Toxics Inspection	> Storm Water-MS4-Audit
P Pretreatment Compliance Inspection	5 IU Sampling Inspection with Pretreatment	
R Reconnaissance		
S Compliance Sampling		
U IU Inspection with Pretreatment Audit		

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

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UPDES Storm Water Industrial Inspection

Background Information

National Database Information		General	
Inspection Type	CEI <u>W</u>	Inspector Name	L. Shull
UPDES ID Number	U50025992	Telephone	801-534-4394
Inspection Date	6-8-2008	Entry Time	9:30
Inspector Type	EPA <input checked="" type="radio"/> State <input type="radio"/> EPA Oversight	Exit Time	11:45

Facility Location Information			
Name/Location/Mailing Address	Alton Coal + Dev. - N & S Private Lease		
GPS Coordinates	Latitude		Longitude
Receiving Water(s)	Lower Robinson Cr., Sink valleywash, Kanab Cr		
MS4's	None		

Contact Information		
	Name	Telephone
Owner/Permittee	Alton Coal + Dev	
Operator	Same	
Co-Permittee	None	
Facility Contact & Title	Kirk Archules, Env Scientist	
Authorized Official(s)	Harry Johnson, mine manager	

Site Information:	
Industrial Activity	Surface + Under ground Coal mines
SIC Code(s)	1221

Basic Permit Information (circle one)		
Permit Coverage	<input checked="" type="radio"/> Y	<input type="radio"/> N
Permit Type	General	<input checked="" type="radio"/> Individual
Copy of NOI on site?	Y	N
NOI Date	NA	

Basic SWPPP Information		
SWPPP on site	<input checked="" type="radio"/> Y	<input type="radio"/> N
SWPPP Satisfactory*	Y	<input checked="" type="radio"/> N
SWPPP Implementation Satisfactory	<input checked="" type="radio"/> Y	<input type="radio"/> N
*A Satisfactory SWPPP must be both current and complete (see pages 4, 5, and 6 of this checklist).		

Permit on site

No SWPPP for South h lease
could be source.

UPDES Storm Water Industrial Inspection

SWPPP Review Checklist (continued)

Summary of Potential Pollutant Sources		Notes:
Description of activities, materials, features of site with potential to contribute significant amounts of pollutants to storm water?	Y	N

Significant Spills & Leaks		Notes:
List of significant spills and leaks over 3 year time period, description of response taken, and actions to prevent similar spills?	Y	N NA

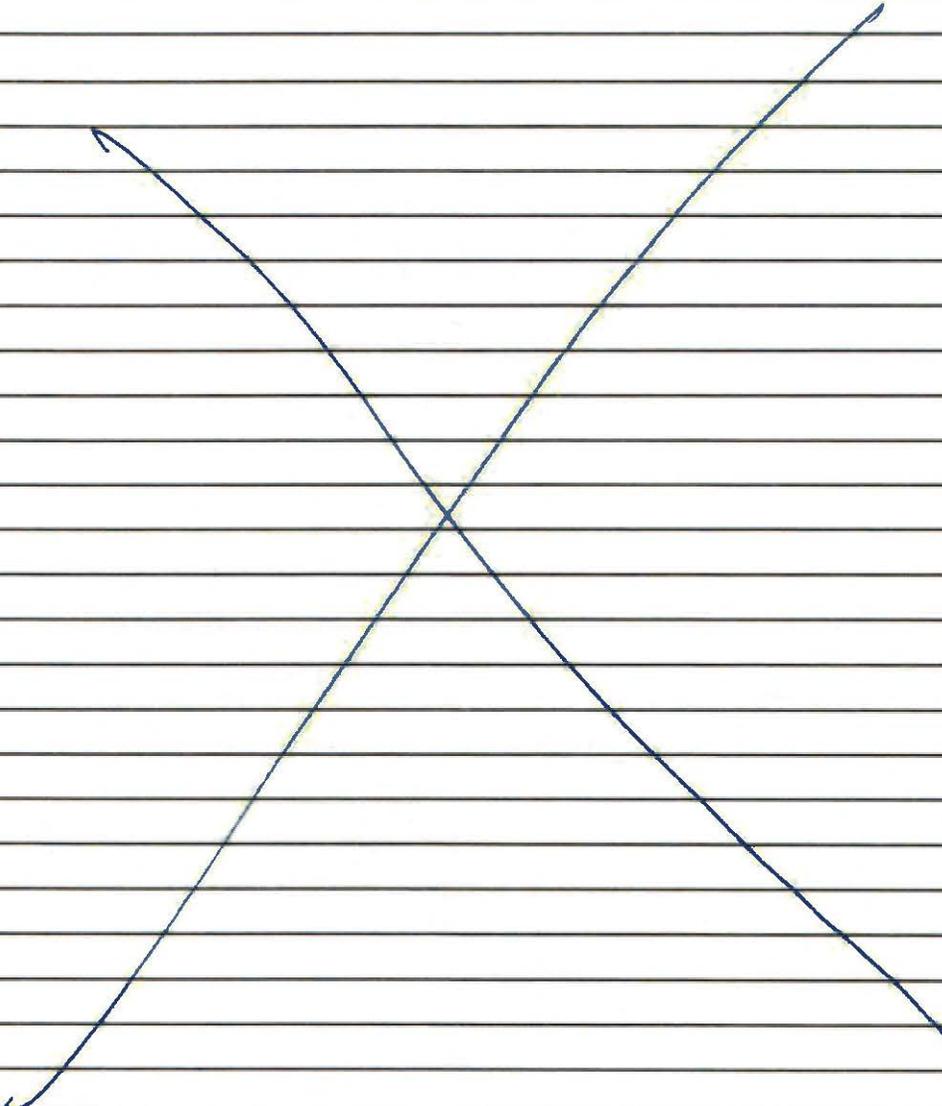
Storm Water Controls		Notes:
Description of the <i>non-structural</i> controls and structural controls that will be used to prevent/reduce discharge of pollutants in storm water runoff?	Y	N
Description of other controls to prevent/reduce off-site tracking or blowing of sediment, dust and raw, final or waste materials, or other solid materials and floating debris?	Y	N
Incorporation of the 8 baseline controls (good housekeeping, minimizing exposure, PM, spill prevention/response procedures, routine inspections and comprehensive site evaluations, employee training, sediment and erosion control, runoff management)?	Y	N
Completed routine inspection reports/logs regarding reportable implementation of 8 baseline controls included?	Y	N
Descriptions of the pollutant or activity to be controlled by each selected control and provide an implementation schedule?	Y	N

Non-Storm Water Discharges		Notes:
Certification that facility has been tested for non-storm water discharges from the site?	Y	N
Description of testing method, drainage points, observed results, and date of test?	Y	N

Monitoring		Notes:
Are samples collected within 30 minutes of measurable weather events occurring 72 hours after previous measurable weather event?	Y	N NA

UPDES Storm Water Industrial Inspection

<u>Photograph Log</u>	
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E0012	Failure to Submit DMRs	D0R18	Failure to apply for a notice of termination
E0016	Failure to submit required report (non-DMR, non-pretreatment)	B0R12	Failure to Conduct Inspections
E0013	Improper/ Incorrect Reporting	B0C17	Failure to develop any or adequate SWPPP/SWMP
E0011	Late Submittal of DMRs	B0C18	Failure to Implement SWPPP/SWMP
E0014	Noncompliance with Section 308 Information Request	B0R41	Failure to Maintain Records
Pretreatment		C0R11	Failure to Monitor
C0012	Baseline Monitoring Report Violation	BR19A	Failure to properly install/implement BMPs
B0P12	Failure to Conduct Inspections	BR19B	Failure to properly operate and maintain BMPs
B0P11	Failure to Develop/Enforce Standards	D0R12	Failure to submit required permit application information
B0013	Failure to Enforce Against I/U	E0R16	Failure to submit required report (non-DMR)
B0015	Failure to Establish Local Limits	A0R22	Narrative effluent violation
C0013	Failure to Establish Self-Monitoring Requirements	E0R14	Noncompliance with section 308 Information Request
B0014	Failure to Issue SIU Permits	A0R12	Numeric Effluent Violation
B0016	Failure to Meet Inspection and Sampling Plan for SIUs	B0R42	Violation of a milestone in an order
E0015	Failure to submit required report (non-DMR)	Storm Water MS4	
B0P40	Improper Chemical Handling	D0M11	Discharge without a permit
A0014	IU Violation of Pretreatment Standards	D0M18	Failure to apply for a notice of termination
CAFO		B0M12	Failure to Conduct Inspections
B0A19	Best Management Practice Deficiencies	B0M17	Failure to develop any or adequate SWPPP/SWMP
B0038	Direct Animal Contact with Waters of US	B0M18	Failure to Implement SWPPP/SWMP
D0A11	Discharge without a permit	B0M41	Failure to Maintain Records or Meet Record Keeping
B0A12	Failure to Conduct Inspections	C0M11	Failure to Monitor
B0032	Failure to Develop any or adequate NMP	BM19A	Failure to properly install/implement BMPs
B0033	Failure to Implement NMP	BM19B	Failure to properly operate and maintain BMPs
B0A41	Failure to Maintain Records or Meet Record Keeping Requirements	D0M12	Failure to submit required permit application information
B0043	Failure to meet order final compliance date	E0M16	Failure to submit required report (non-DMR)
C0A11	Failure to Monitor	A0M22	Narrative effluent violation
D0A12	Failure to submit required permit application information	E0M14	Noncompliance with section 308 Information Request
C0019	Failure to Test Manure	A0M12	Numeric Effluent Violation
B0A40	Improper Chemical Handling	B0M42	Violation of a milestone in an order
B0A23	Improper Land Application	Storm Water Non-Construction	
B0039	Improper Manure Handling (not including land application)	D0N11	Discharge without a permit
B0037	Improper Mortality Management	D0N18	Failure to apply for a notice of termination
B0036	Improper O&M of Storage Facility	B0N12	Failure to Conduct Inspections
E0A13	Improper/Incorrect reporting	B0N17	Failure to develop any or adequate SWPPP/SWMP
B0034	Insufficient Buffers/Setbacks	B0N18	Failure to Implement SWPPP/SWMP
B0035	Insufficient Storage Capacity	B0N41	Failure to Maintain Records
A0A22	Narrative effluent violation	C0N11	Failure to Monitor
E0A16	No Annual Report Submitted	BN19A	Failure to properly install/implement BMPs
C0020	No Depth Marker	BN19B	Failure to properly operate and maintain BMPs
E0A14	Noncompliance with section 308 Information Request	D0N12	Failure to submit required permit application information
A0A12	Numeric effluent violation	E0N16	Failure to submit required report (non-DMR)
A0019	Production Area Runoff	A0N22	Narrative effluent violation
B0A42	Violation of a milestone in an order	E0N14	Noncompliance with section 308 Information Request
		A0N12	Numeric Effluent Violation
		B0N42	Violation of a milestone in an order

* N. B. The codes and code names listed herein may change over time. Please consult ICIS-NPDES and PCS system documentation for updated lists.

Single Event Violation Table - Codes and Descriptions*

CODE	DESCRIPTION	CODE	DESCRIPTION
Effluent Violations		CSO	
A0018	Approved Bypass	A0C18	Approved Bypass
A0013	Failed Toxicity Test	A0024	Dry weather overflow
A0023	Industrial Spill	B0030	Failure to Develop Adequate LTCP
A0017	Inspection sample above historic DMR range	B0031	Failure to Implement LTCP
A0022	Narrative Effluent Violation	B0029	Failure to Implement Nine Minimum Controls (NMCs)
A0012	Numeric effluent violation	BC291	Failure to implement required NMC #1(Proper operation and maintenance)
A0016	Reported Fish Kill	BC292	Failure to implement required NMC #2 (Maximum use of the collection system)
A0011	Unapproved Bypass	BC293	Failure to implement required NMC #3 (Review pretreatment requirements)
A0015	Unauthorized Discharge of Brine	BC294	Failure to implement required NMC #4 (Maximization of flow)
Management Practice Violations		BC295	Failure to implement required NMC #5 (Elimination of dry weather flow)
B0019	Best Management Practice Deficiencies	BC296	Failure to implement required NMC #6 (Control of solids)
B0024	Biosolids/Sewage Sludge Violation (Part 503)	BC297	Failure to implement required NMC #7 (Pollution prevention programs)
B0026	Failure to Allow Entry	BC298	Failure to implement required NMC #8 (Public notification)
B0012	Failure to Conduct Inspections	BC299	Failure to implement required NMC #9 (Monitoring)
B0027	Failure to Develop Adequate SPCC Plan	B0C41	Failure to Maintain Records or Meet Record Keeping Requirements
B0017	Failure to develop any or adequate SWPPP/SWMP	C0C11	Failure to monitor
B0011	Failure to Develop/Enforce Standards	E0C16	Failure to submit required report (non-DMR)
B0028	Failure to Implement SPCC Plan	E0C13	Improper/Incorrect reporting
B0018	Failure to Implement SWPPP/SWMP	B0044	LTCP implementation schedule milestone missed
B0041	Failure to Maintain Records	A0C22	Narrative effluent violation
B0040	Improper Chemical Handling	E0C14	Noncompliance with section 308 Information Request
B0023	Improper Land Application (non-503, non-CAFO)	A0C12	Numeric effluent violation
B0020	Improper Operation and Maintenance	A0C11	Related Unapproved Bypass
B0025	Inflow/Infiltration (I/I)	A0021	Unauthorized CSO Discharge to Waters/Wet Weather
B0021	Laboratory Not Certified	A0025	Unauthorized overflow to dry land or building backup
B0022	No Licensed/Certified Operator	B0045	Violation of a milestone in a permit
B0042	Violation of a milestone in an order	B0C42	Violation of a milestone in an order
Monitoring Violations		SSO	
C0017	Analysis not Conducted	A0S18	Approved Bypass
C0011	Failure to Monitor for non-Toxicity Requirements	A0020	Discharge to Waters
C0021	Failure to Monitor for Toxicity Requirements	D0S11	Discharge without a valid permit (includes satellite systems)
C0015	Frequency of Sampling Violation	B0S41	Failure to Maintain Records or Meet Record Keeping Requirements
C0018	Improper Analysis or Lab Error	C0S11	Failure to monitor
C0014	Invalid/Unrepresentative Sample	E0018	Failure to report other violation
C0016	No Flow Measurement Device	E0019	Failure to report violation that may endanger public health 122.41(l)(7)
Permitting Violations		D0S12	Failure to submit required permit application info (includes satellite systems)
D0014	Application Incomplete	B0S20	Improper Operation and Maintenance
D0011	Discharge Without a Valid Permit	A0S22	Narrative effluent violation
D0012	Failure to Apply for a Permit	E0S14	Noncompliance with section 308 Information Request
D0015	Failure to Pay Fees	A0S12	Numeric effluent violation
D0016	Failure to Submit Timely Permit Renewal Application	A0026	Overflow to Dry Land or Building Backup
D0013	Unapproved Operation	A0S11	Related Unapproved Bypass
D0017	Violation Specified in Comment	BS42A	Violation of milestone in an administrative order
		BS42J	Violation of milestone in judicial decree
		B0046	Violation of sewer moratorium or restriction

Reporting Violations		Storm Water Construction	
E0017	Failure to Notify	D0R11	Discharge without a permit



United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., ICIS)

Transaction Code N	NPDES UT0025992	yr/mo/day 180608	Inspection Type ~	Inspector S	Fac. Type 2
21	Remarks	66			
Inspection Work Days 050	Facility Self-Monitoring Evaluation Rating 3	BI []	QA N	Reserved	
67	69	70	71	72	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Alton Coal Development, LLC – South and North Private Leases 3 miles South of Alton Utah	Entry Time/ Date 9:30 6/8/2018	Permit Effective Date 9/1/2016
	Exit Time/ Date 11:45 6/8/2018	Permit Expiration Date 7/31/2018
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Kirk Nicholes, Environmental Specialist (435) 691-1551	Other Facility Data (e.g., SIC NAICS, and other descriptive information)	
Name, Address of Responsible Official/Title/Phone and Fax Number Larry Johnson, Mine manager Alton Coal Development, LLC 463 North 100 West, Suite1 Cedar City, Utah 84721 (435) 691-2983	Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

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<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedule	<input type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water	
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
B 0 N 1 7	Failure To Develop Any Or Adequate Swppp/Swmp
[] [] [] [] []	
[] [] [] [] []	
[] [] [] [] []	

Name(s) and Signature(s) of Inspector(s) Lonnie Shull 	Agency/Office/Phone and Fax Number(s) Utah Division of Water Quality (801) 536-4394	Date: 6/28/18
Name and Signature of Management Q A Reviewer Matt Garn 	Agency/Office/Phone and Fax Number(s) Utah Division of Water Quality (801) 536-4381	Date: 6-28-2018

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Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.