Alton Coal Development, LLC
463 North 100 West, Suite 1
Cedar City, Utah 84720
Phone (435) 867-5311 Fax (435) 867-1192

September 11, 2020

Steve Christensen
Acting Coal Program Manager
Oil, Gas & Mining
1594 West North Temple, Suite 1210
Salt Lake City, UT 84114-5801

Re: **2019 Annual Report Revisions, Alton Coal Development, LLC, Coal Hollow Mine, Kane County, Utah, C/025/0005, Task #6124**

Dear Mr. Christensen:

Alton Coal Development, LLC (ACD) is hereby submitting responses to the deficiencies identified in Task #6124. Response to deficiencies are as follows:

1. Provide up to date seismograph calibration certificate. The most recent calibration on file is dated October 12, 2016.

The October 12, 2016 certificate remains the most recent seismograph calibration certificate for the unit used at Coal Hollow Mine. However, Southwest Energy has indicated that this unit is currently out for calibration now.

2. Dwg 5-76 A & B must show the 33.7 acres of stockpile locations being seeded in the same year that soil is utilized. Please submit revised drawing with accompanying C1/C2 form for incorporation into the MRP.

Drawings 5-76A and B have been revised to show the current schedule for the NPL reclamation.

3. Dwg 5-76 A &B must show a timeframe for reclamation of the temporary county road going around the site. Please submit revised drawing with accompanying C1/C2 form for incorporation into the MRP.

As the temporary county road is not within the mine permit area the timeframe for reclamation is not shown in the MRP reclamation sequence.

4. Dwg 5-38 must label SL bond polygons. Alternatively, the Permittee could provide another map with all South Lease bond polygons. Please submit revised drawing with accompanying C1/C2 form for incorporation into the MRP.

Bond polygons for the South Private Lease are shown on Drawing 5-19 of the MRP.

5. The annual report indicates that 19,430 CY of subsoil was live hauled in 2019; however no final grading was completed in 2019. Please state where the subsoil was live hauled and redistributed.

The intentions of the estimated 19,430 CY of subsoil was to live haul to the area of the former Pit 10 in the SPL, however backfilling Pit 10 and return to final grade of the live haul area took longer than anticipated. This subsoil was placed in a stockpile (sloped with berm) and has been added to Drawing 2-2 (added to C1C2 as part of this submission) as Subsoil Pile #3 south of the former Pit 10. It has been formally determined that this stockpile contains 25,550 CY of material that will be utilized in this fall's reclamation.

Changes to the MRP associated with this amendment have been uploaded to the DOGM's server for review. PDF versions of the drawings are not certified. Upon approval, 2 (two) clean hard copies of the text and certified drawings for insertion into the MRP will be submitted. Please do not hesitate to contact me if you have any questions 435-691-1551.

Very truly yours,

B. Kirk Nicholes

B. Kirk Nicholes
Environmental Specialist
Alton Coal Development

APPLICATION FOR COAL PERMIT PROCESSING

Permit Change ☒ New Permit ☐ Renewal ☐ Exploration ☐ Bond Release ☐ Transfer ☐

Permittee: Alton Coal Development, LLC
Mine: Coal Hollow Mine
Permit Number: C/025/0005
Title: MRP Annual Report 2019 amendments to permit

Description, Include reason for application and timing required to implement:
Addition of new topsoil analysis

Instructions: If you answer yes to any of the first eight questions, this application may require Public Notice publication.

☐ Yes ☒ No 1. Change in the size of the Permit Area? Acres: _____ Disturbed Area: _____ ☐ increase ☐ decrease.
☐ Yes ☒ No 2. Is the application submitted as a result of a Division Order? DO# _____
☐ Yes ☒ No 3. Does the application include operations outside a previously identified Cumulative Hydrologic Impact Area?
☐ Yes ☒ No 4. Does the application include operations in hydrologic basins other than as currently approved?
☐ Yes ☒ No 5. Does the application result from cancellation, reduction or increase of insurance or reclamation bond?
☐ Yes ☒ No 6. Does the application require or include public notice publication?
☐ Yes ☒ No 7. Does the application require or include ownership, control, right-of-entry, or compliance information?
☐ Yes ☒ No 8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
☐ Yes ☒ No 9. Is the application submitted as a result of a Violation? NOV # _____
☐ Yes ☒ No 10. Is the application submitted as a result of other laws or regulations or policies?
Explain: _____
☐ Yes ☒ No 11. Does the application affect the surface landowner or change the post mining land use?
☐ Yes ☒ No 12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2)
☐ Yes ☒ No 13. Does the application require or include collection and reporting of any baseline information?
☐ Yes ☒ No 14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
☐ Yes ☒ No 15. Does the application require or include soil removal, storage or placement?
☐ Yes ☒ No 16. Does the application require or include vegetation monitoring, removal or revegetation activities?
☐ Yes ☒ No 17. Does the application require or include construction, modification, or removal of surface facilities?
☐ Yes ☒ No 18. Does the application require or include water monitoring, sediment or drainage control measures?
☐ Yes ☒ No 19. Does the application require or include certified designs, maps or calculation?
☐ Yes ☒ No 20. Does the application require or include subsidence control or monitoring?
☐ Yes ☒ No 21. Have reclamation costs for bonding been provided?
☐ Yes ☒ No 22. Does the application involve a perennial stream, a stream buffer zone or discharges to a stream?
☐ Yes ☒ No 23. Does the application affect permits issued by other agencies or permits issued to other entities?
☐ Yes ☒ No 24. Does the application include confidential information and is it clearly marked and separated in the plan?

Please attach three (3) review copies of the application. If the mine is on or adjacent to Forest Service land please submit four (4) copies, thank you. (These numbers include a copy for the Price Field Office)

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein.

B. Kirk Nicholes	Resident Agent	04/02/2020	
Print Name	Position	Date	Signature (Right-click above choose certify then have notary sign below)

Subscribed and sworn to before me this 2 day of April, 2020

Notary Public: Marty Nicholes, state of Utah.

My commission Expires: 9-11-2021 Iron County

Commission Number: 696219

Address: ~~905~~ 415 N Main St Ste 206

City: Cedar City UT State: ~~UT~~ UT Zip: 84721

MARTY G. NICHOLES
Notary Public, State of Utah
My Commission Expires
September 11, 2021
Commission # 696219

For Office Use Only:	Assigned Tracking Number:	Received by Oil, Gas & Mining

APPLICATION FOR COAL PERMIT PROCESSING
Detailed Schedule Of Changes to the Mining And Reclamation Plan

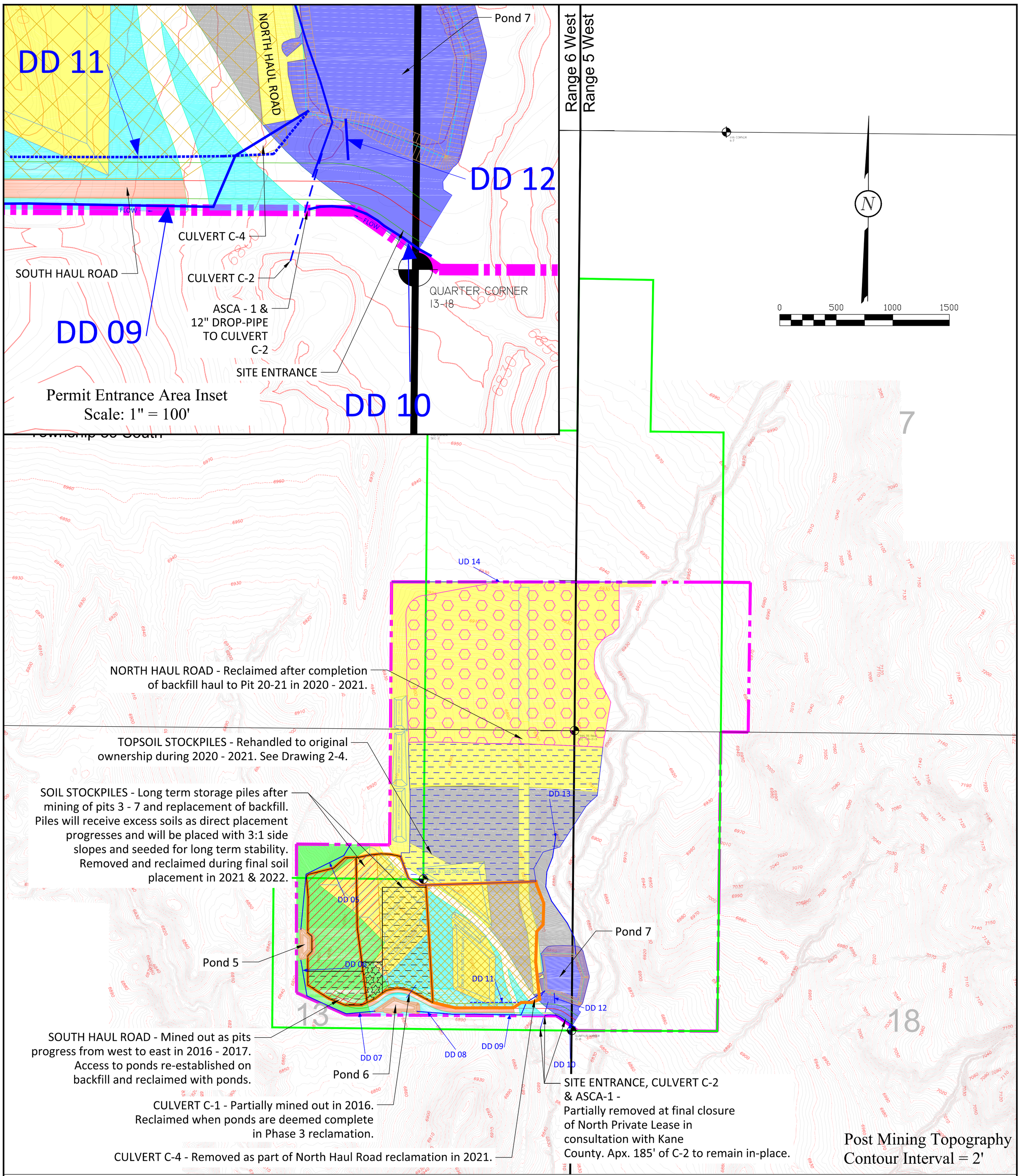
Permittee: Alton Coal Development, LLC
Mine: Coal Hollow Mine
Title: MRP Annual Report 2019 amendments to permit

Permit Number: C/025/0005

Provide a detailed listing of all changes to the Mining and Reclamation Plan, which is required as a result of this proposed permit application. Individually list all maps and drawings that are added, replaced, or removed from the plan. Include changes to the table of contents, section of the plan, or other information as needed to specifically locate, identify and revise the existing Mining and Reclamation Plan. Include page, section and drawing number as part of the description.

			DESCRIPTION OF MAP, TEXT, OR MATERIAL TO BE CHANGED
☐ Add	☒ Replace	☐ Remove	Chapter 5, Drawing 5-38
☐ Add	☒ Replace	☐ Remove	Chapter 5, Drawing 5-76A
☐ Add	☒ Replace	☐ Remove	Chapter 5, Drawing 5-76B
☐ Add	☒ Replace	☐ Remove	Chapter 7 Appendix 7-5
☐ Add	☒ Replace	☐ Remove	Chapter 2, Drawing 2-2
☐ Add	☐ Replace	☐ Remove	
☐ Add	☐ Replace	☐ Remove	
☐ Add	☐ Replace	☐ Remove	
☐ Add	☐ Replace	☐ Remove	
☐ Add	☐ Replace	☐ Remove	
☐ Add	☐ Replace	☐ Remove	
☐ Add	☐ Replace	☐ Remove	
☐ Add	☐ Replace	☐ Remove	
☐ Add	☐ Replace	☐ Remove	
☐ Add	☐ Replace	☐ Remove	
☐ Add	☐ Replace	☐ Remove	
☐ Add	☐ Replace	☐ Remove	
☐ Add	☐ Replace	☐ Remove	
☐ Add	☐ Replace	☐ Remove	
☐ Add	☐ Replace	☐ Remove	
☐ Add	☐ Replace	☐ Remove	
☐ Add	☐ Replace	☐ Remove	
☐ Add	☐ Replace	☐ Remove	
☐ Add	☐ Replace	☐ Remove	
☐ Add	☐ Replace	☐ Remove	
☐ Add	☐ Replace	☐ Remove	

Any other specific or special instruction required for insertion of this proposal into the Mining and Reclamation Plan.	Received by Oil, Gas & Mining



Phase 1 Reclamation:

- 2016 Reclaim = 17.9 Acres
- 2017 Reclaim = 34.7 Acres
- 2018 Reclaim = 0.0 Acres
- 2019 Reclaim = 0.0 Acres
- 2020 Reclaim = 41.8 Acres
- 2021 Reclaim = 56.9 Acres
- 2022 Reclaim = 0.0 Acres
- 2023 Reclaim = 0.0 Acres
- 2024 Reclaim = 0.0 Acres

Total Ph. 1 Reclamation = 151.3 Acres

Phase 2/Surface Mulch & Seeding:

- 2016 Seeding = 18.4 Acres
- 2017 Seeding = 11.9 Acres
- 2018 Seeding = 0.0 Acres
- 2019 Seeding = 0.0 Acres
- 2020 Seeding = 30.0 Acres
- 2021 Seeding = 109.2 Acres
- 2022 Seeding = 2.9 Acres
- 2023 Seeding = 5.5 Acres
- 2024 Seeding = 0.0 Acres
- Unseeded Road = 3.9 Acres

Total Ph. 2 Reclamation = 181.8 Acres

Phase 3 Reclamation to be completed and released within the 10 year timeframe from Phase 1. **Ponds, culverts and ditches (except Area 1 extension)** to be assessed and reclaimed as Phase 3 nears completion. Area 1-A structures will be removed as mining advances.

Contour Interval = 2'

LEGEND:
- PERMIT BOUNDARY
- PRIVATE COAL OWNERSHIP
- SECTION LINE
- FOUND SECTION CORNER
- FOUND PROPERTY CORNER

DRAWN BY:	CHECKED BY:
A. CHRISTENSEN	DWG
DRAWING: 5-76B	DATE: 10/12/15
	SCALE: 1" = 400'
JOB NUMBER: 0001	SHEET

REVISIONS

DATE:	BY:
10/3/16	AC
3/31/16	AC
5/4/17	AC
4/6/18	AC
6/19/18	AC
3/29/19	AC
9/10/20	AC

FACILITIES RECLAMATION SEQUENCE

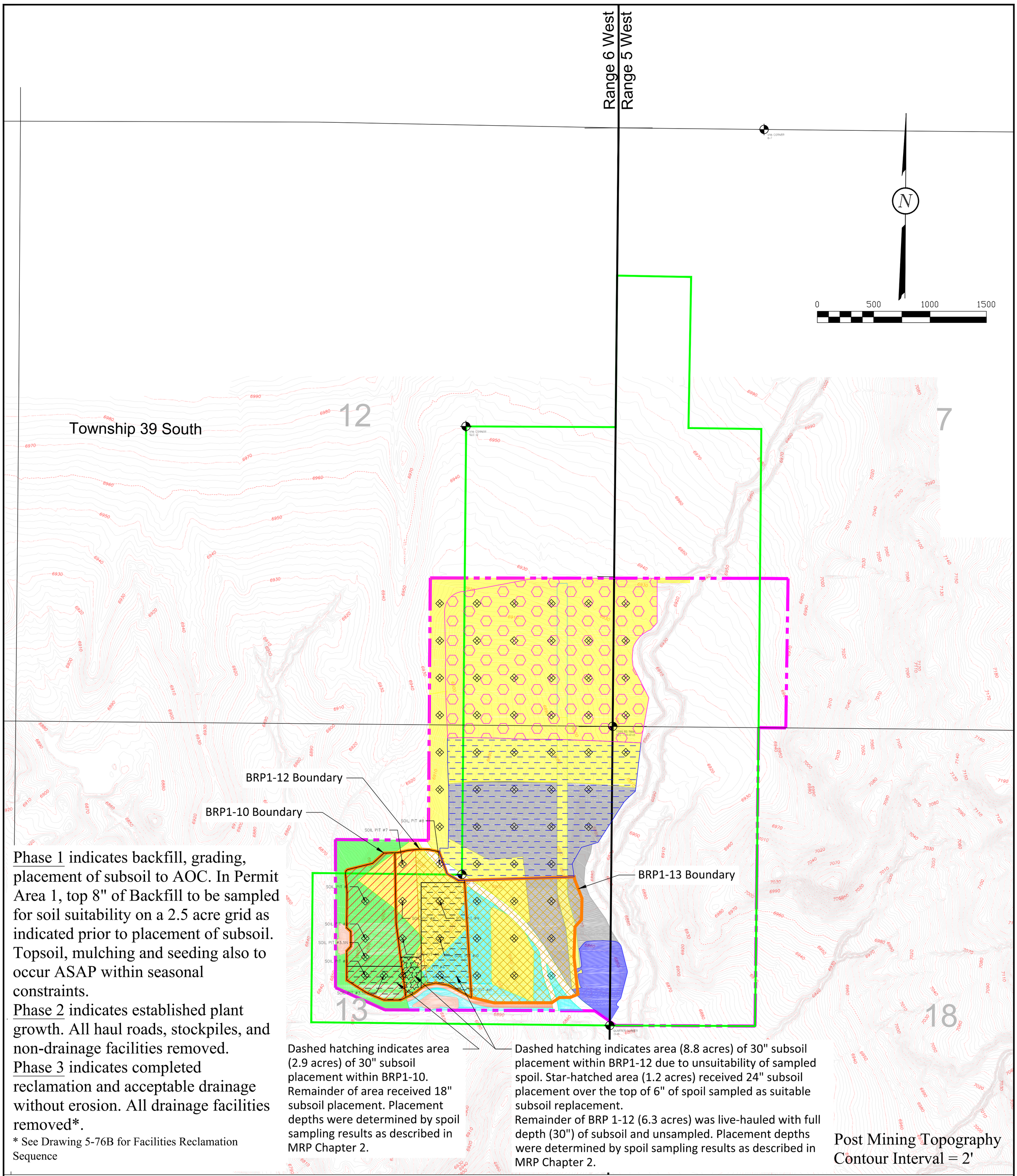
NORTH COAL HOLLOW PROJECT
ALTON, UTAH

DRAWING: 5-76B

PROFESSIONAL ENGINEER 10230818 ANDREW R. CHRISTENSEN STATE OF UTAH

Alton Coal Development
Coal Hollow Project

463 North 100 West, Suite 1
Cedar City, Utah 84721
Phone (435)867-5331
Fax (435)867-1192



Phase 1 indicates backfill, grading, placement of subsoil to AOC. In Permit Area 1, top 8" of Backfill to be sampled for soil suitability on a 2.5 acre grid as indicated prior to placement of subsoil. Topsoil, mulching and seeding also to occur ASAP within seasonal constraints.

Phase 2 indicates established plant growth. All haul roads, stockpiles, and non-drainage facilities removed.

Phase 3 indicates completed reclamation and acceptable drainage without erosion. All drainage facilities removed*.

* See Drawing 5-76B for Facilities Reclamation Sequence

Phase 1 Reclamation:

- 2016 Reclaim = 17.9 Acres
- 2017 Reclaim = 34.7 Acres
- 2018 Reclaim = 0.0 Acres
- 2019 Reclaim = 0.0 Acres
- 2020 Reclaim = 41.8 Acres
- 2021 Reclaim = 56.9 Acres
- 2022 Reclaim = 0.0 Acres
- 2023 Reclaim = 0.0 Acres
- 2024 Reclaim = 0.0 Acres

Total Ph. 1 Reclamation = 151.3 Acres

Phase 2/Surface Mulch & Seeding:

- 2016 Seeding = 18.4 Acres
- 2017 Seeding = 11.9 Acres
- 2018 Seeding = 0.0 Acres
- 2019 Seeding = 0.0 Acres
- 2020 Seeding = 30.0 Acres
- 2021 Seeding = 109.2 Acres
- 2022 Seeding = 2.9 Acres
- 2023 Seeding = 5.5 Acres
- 2024 Seeding = 0.0 Acres
- Unseeded Road = 3.9 Acres

Total Ph. 2 Reclamation = 181.8 Acres

Phase 3 Reclamation to be completed and released within the 10 year timeframe from Phase 1.

LEGEND:

- PERMIT BOUNDARY
- PRIVATE COAL OWNERSHIP
- SECTION LINE
- FOUND SECTION CORNER
- FOUND PROPERTY CORNER
- BACKFILL SAMPLE PIT

DRAWN BY:	CHECKED BY:
A. CHRISTENSEN	DWG
DRAWING: 5-76A	DATE: 4/16/15
	SCALE: 1" = 400'
JOB NUMBER: 0001	SHEET

REVISIONS

DATE:	BY:
3/31/17	AC
5/4/17	AC
8/2/17	AC
4/6/18	AC
6/19/18	AC
3/29/19	AC
9/10/20	AC

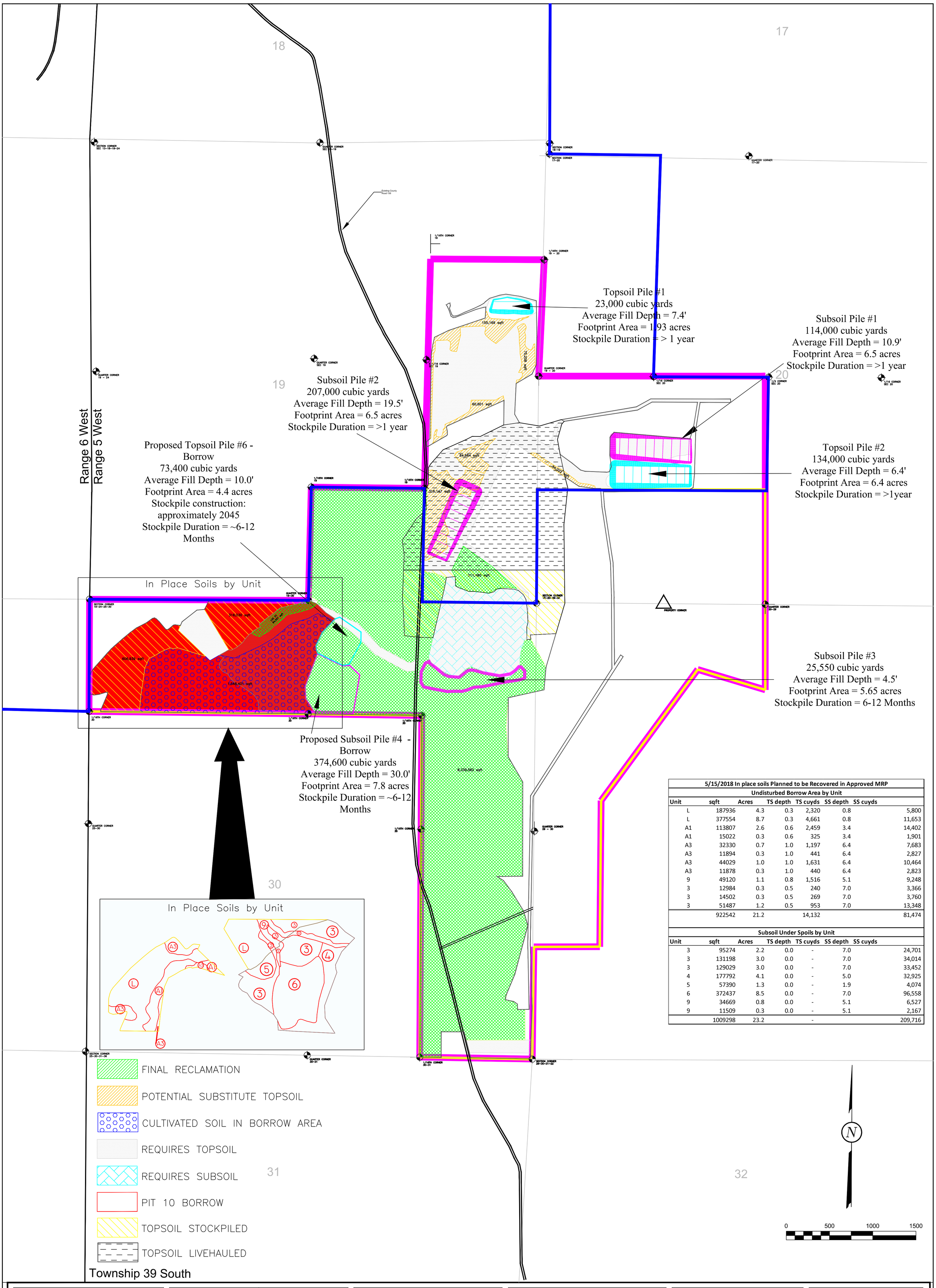
EARTHWORKS RECLAMATION SEQUENCE

NORTH COAL HOLLOW PROJECT
ALTON, UTAH

DRAWING: 5-76A

PROFESSIONAL ENGINEER 10230818 ANDREW R. CHRISTENSEN STATE OF UTAH

Alton Coal Development
Coal Hollow Project
463 North 100 West, Suite 1
Cedar City, Utah 84721
Phone (435)867-5331
Fax (435)867-1192



5/15/2018 In place soils Planned to be Recovered in Approved MRP						
Undisturbed Borrow Area by Unit						
Unit	sqft	Acres	TS depth	TS cuyds	SS depth	SS cuyds
L	187936	4.3	0.3	2,320	0.8	5,800
L	377554	8.7	0.3	4,661	0.8	11,653
A1	113807	2.6	0.6	2,459	3.4	14,402
A1	15022	0.3	0.6	325	3.4	1,901
A3	32330	0.7	1.0	1,197	6.4	7,683
A3	11894	0.3	1.0	441	6.4	2,827
A3	44029	1.0	1.0	1,631	6.4	10,464
A3	11878	0.3	1.0	440	6.4	2,823
9	49120	1.1	0.8	1,516	5.1	9,248
3	12984	0.3	0.5	240	7.0	3,366
3	14502	0.3	0.5	269	7.0	3,760
3	51487	1.2	0.5	953	7.0	13,348
	922542	21.2		14,132		81,474

Subsoil Under Spoils by Unit						
Unit	sqft	Acres	TS depth	TS cuyds	SS depth	SS cuyds
3	95274	2.2	0.0	-	7.0	24,701
3	131198	3.0	0.0	-	7.0	34,014
3	129029	3.0	0.0	-	7.0	33,452
4	177792	4.1	0.0	-	5.0	32,925
5	57390	1.3	0.0	-	1.9	4,074
6	372437	8.5	0.0	-	7.0	96,558
9	34669	0.8	0.0	-	5.1	6,527
9	11509	0.3	0.0	-	5.1	2,167
	1009298	23.2		-		209,716

LEGEND:
- SPL PERMIT AREA
- LBA PERMIT AREA
- PRIVATE COAL OWNERSHIP
- BONDED DISTURBANCE
- SECTION LINE
- FOUND SECTION CORNER
- FOUND PROPERTY CORNER

DRAWN BY:	CHECKED BY:
K.NICHOLES	LWJ
DRAWING: 2–2	DATE: 2/27/14
	SCALE: 1" = 500' Printed on 24"x 36"
JOB NUMBER: 1400	SHEET

REVISIONS

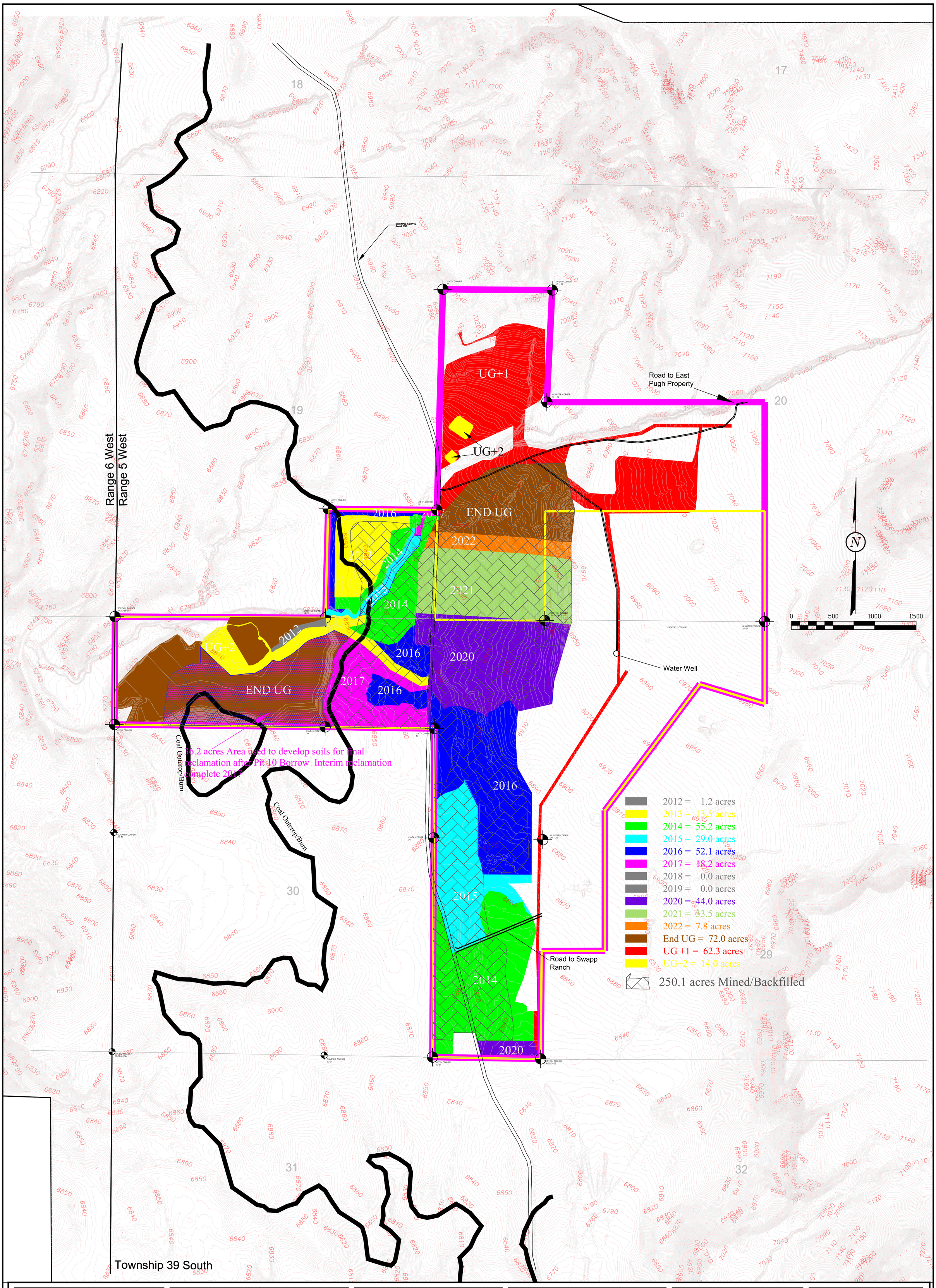
DATE:	BY:
12/04/14	KN
8/17/14	KN
10/17/14	KN
5/15/18	KN
7/18/18	KN
10/12/18	KN
9/9/20	AC

TOPSOIL HANDLING

COAL HOLLOW PROJECT
ALTON, UTAH

DRAWING: 2-2

Alton Coal Development
Coal Hollow Project
463 North 100 West, Suite 1
Cedar City, Utah 84721
Phone (435)867-5331
Fax (435)867-1192



LEGEND:

- PERMIT BOUNDARY
- PRIVATE COAL OWNERSHIP
- SECTION LINE
- FOUND SECTION CORNER
- FOUND PROPERTY CORNER
- POSTMINING ROADS

DRAWN BY:	CHECKED BY:
K. NICHOLES	LWJ
DRAWING: 5—38	DATE: 12/18/2014
	SCALE: 1" = 500'
JOB NUMBER: 1400	SHEET

REVISIONS

DATE:	BY:
08/01/16	KN
03/31/17	KN
03/22/18	KN
8/9/18	AC
8/14/19	AC
3/31/20	AC
9/9/20	AC

RECLAMATION SEQUENCE

COAL HOLLOW PROJECT
ALTON, UTAH

DRAWING: 5-38

PROFESSIONAL ENGINEER 10230818 ANDREW R. CHRISTENSEN STATE OF UTAH

Alton Coal Development
Coal Hollow Project
463 North 100 West, Suite 1
Cedar City, Utah 84721
Phone (435)867-5331
Fax (435)867-1192

Appendix 7-5

Facilities Spill Plan

ALTON COAL DEVELOPMENT, LLC COAL
HOLLOW MINE
463 NORTH 100 WEST, SUITE I CEDAR CITY,
UTAH 84721

SPILL PLAN

PREPARED BY:

Alton Coal Development, LLC
463 N. 170 E. Suite 1
Cedar City, Utah 84721

March 2020

TABLE OF CONTENTS

1 Purpose, General Information, and Management Approval 1

2 Spill Plan Certification and Amendments 2

3 Facility Information 3

4 Spill Response, Cleanup, and Disposal Procedures 6

5 Spill Reporting 9

6 Potential for Equipment Failure 12

7 Containment and Diversionary Structures 14

8 Inspections, Tests, and Records 15

9 Personnel Training 16

10 Site Security 17

11 Facility Tank Car and Tank Truck Loading /Unloading Rack 18

12 Materials of Construction 19

List of Appendices

Appendix A Spill Plan Review Form 21
Appendix B Completed Plan Review Forms 23
Appendix C Blank Spill Reporting Form 24
Appendix D Completed Spill Reporting Forms 27
Appendix E Monthly Inspection Form 28
Appendix F Secondary Containment Drainage Log 32

List of Tables

Table 3-1 Oil Storage Containers 4
Table 4-1 Spill Cleanup Equipment and Supplies 6
Table 5-1 Oil S pill Repo11ing Table 10
Table *5-2* Spill Contact Information 11
Table 6-1 Potential for Oil Spills 13
Table 12- 1 Bulk Storage Containers 19

List of Figures

Figure 3- 1 Proposed Facility Site Plan 5

1 Purpose, General Information, and Management Approval

1.1 P URPOSE AND GENERAL INFORMATION

This Spill Plan (Plan) was developed for the Alton Coal facility located at the Coal Hollow Mine (Coal Hollow) near Cedar City, Utah. The purpose of the Plan is to establish procedures, methods, and equipment to prevent the discharge of oil or other hazardous material from the facility into water or upon the ground or in any way that may affect natural resources. This Plan identifies potential sources of spills, establishes measures of prevention, and defines control, cleanup, and reporting procedures.

1.2 MANAGEMENT APPROVAL

The signature below certifies that the management of Alton Coal fully approves of this Spill Plan and will commit the necessary resources to fully implement this Plan as described.

_____	_____
Name	Signature
_____	_____
Title	Date

2 Spill Plan Certification and Amendments

2.1 PROFESSIONAL ENGINEER REVIEW

This Plan has been reviewed and certified by a Registered Professional Engineer. The Professional Engineer's stamp below certifies that:

- The Professional Engineer or their agent has visited and examined the facility:
- The Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards
- Procedures for required inspections and testing have been established; and
- The Plan is adequate for the facility.

_____
Andrew R. Christensen

_____
Registration Number

_____
State

_____
Date

2.2 PLAN REVIEW

Alton Coal will review and evaluate this Plan at least once every five years to ensure its accuracy and to determine if additional or more effective spill protection and control technology that is applicable to the facility must be added. The changes will then be implemented as soon as possible. A Spill Plan review form is included in Appendix A. Completed Plan review forms will be contained in Appendix B.

2.3 PLAN AVAILABILITY

Alton Coal will maintain a complete copy of this Plan at the facility and made available as necessary to regulatory agency representatives for on-sit review during normal working hours.

3 Facility Information

3.1 GENERAL FACILITY INFORMATION

Facility Name and Address:

Company:	Alton Coal Development, LLC – Coal Hollow Mine
Address:	
City, State, Zip Code:	Kane County, UT

Facility Owner:

Company Name:	Alton Coal Development, LLC
Address:	463 North 100 West
City, State, Zip Code:	Cedar City, UT 84721

Facility Contact:

Name:	Clark Atwood
Title:	Mine Manager
Phone Number:	435.867.5331

Facility Location: The facility is located in Kane County.

Facility Description: The Coal Hollow Mine will be a typical surface coal mining operation. The coal sizing portion of the plant will be similar to a sand and gravel operation, with crushing/sizing. Screening, and stock piling. The coal mining will occur in sequential pits. with back filling and reclamation immediately following coal removal from each pit. Coal is transported by truck to the on-site processing area for so11ing and crushing. then routed via conveyors to the stockpile. A dozer will push the coal from the stockpile into the loadout conveyor for transport. Equipment includes one feeder breaker. one secondary crusher, one stacker belt, and miscellaneous mobile equipment.

Table 3 -1 lists the oil storage containers at the facility, including oil-filled equipment and the capacity of each.

Table 3- 1 Oil Storage Containers

TYPE OF EQUIPMENT	CONTENTS
Bulk Storage Tanks	Diesel and gasoline tanks
Oil-filled Operating Equipment	Generators
Portable Storage	Totes or 55-gal oil drums

3.2 PHYSICAL LAYOUT OF THE FACILITY

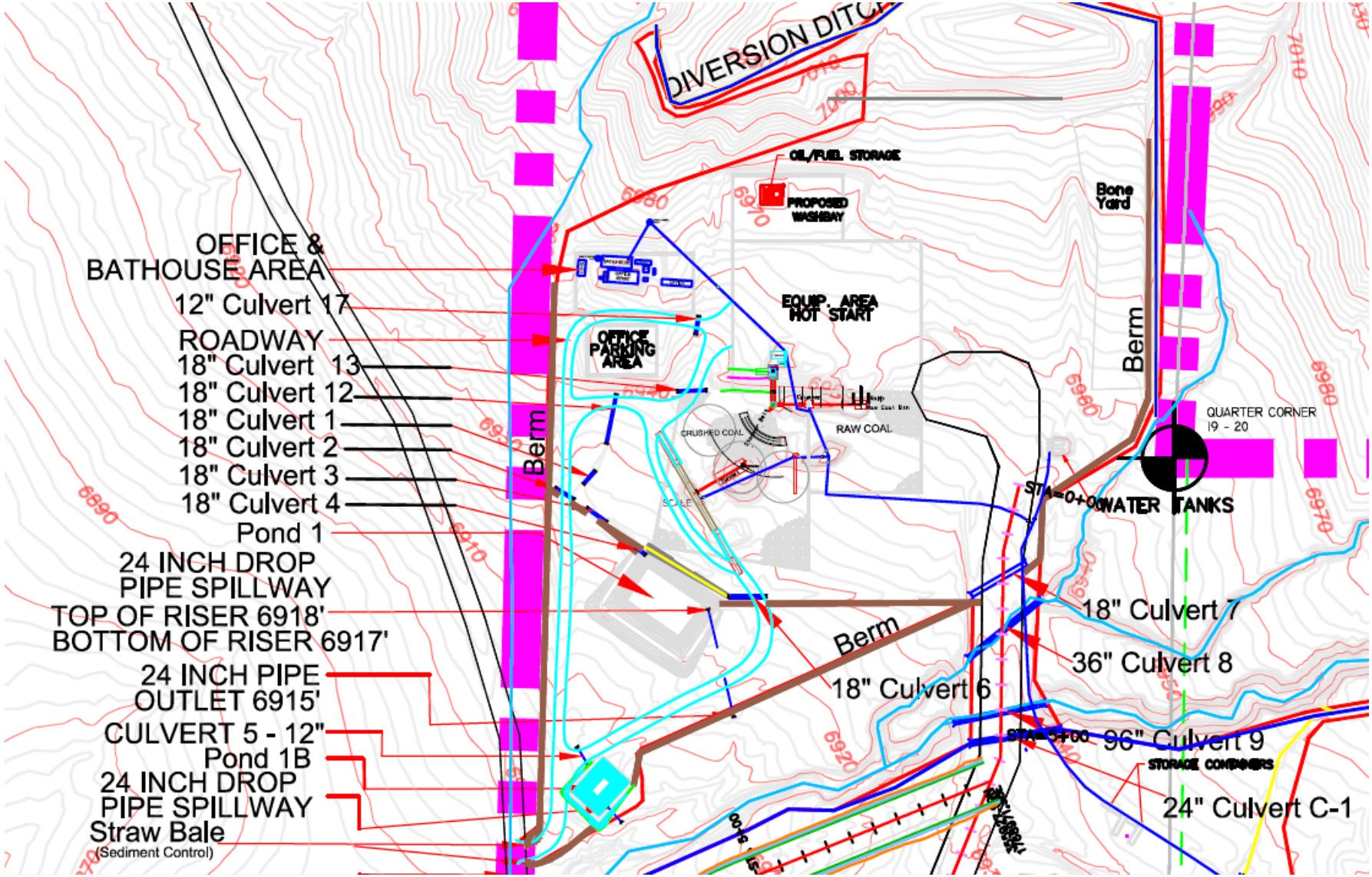
Coal Excavation - Mining at the project site will occur sequentially with work occurring in one 'active disturbed area' at a time, starting at the center of the facility boundaries and then moving towards the southern portion of the facility over a seven-year period.

Sizing/Sorting Process - This operation involves crushing/breaking, screening, conveying, and stockpiling and occurs at the northern portion of the facility.

Robinson Creek intersects the facility just north of the initial excavation area. Several other ditches and culverts will exist at the site.

The proposed physical layout of the facility is shown in Figure 3- 1. The layout of the facility as well as the equipment quantities and types shown are subject to change.

Figure 3- 1 Facility Site Plan



4 Spill Response, Cleanup, and Disposal Procedures

Alton Coal personnel will use established spill response and cleanup procedures in the event of an oil spill. These procedures arc outlined below. However. the procedures will be modified as needed when unforeseen circumstances arise.

4.1 INITIAL SPILL R ESPONSE ACTIONS

=> The first person on the scene must immediately notify their Foreman or Lead Man if the oil spill is outs ide of a secondary containment area or is greater than 10 gallons inside a secondary containment area (see the Internal Spill Reporting requirements in Section 5. 1).

=> Evaluate the health hazards in the area before proceeding.

=> Evacuate the area and establish a security zone around the spill, if needed, and control access into the security zone. Personnel not directly involved with the spill need to stay away from the spill area.

=> Stop release when it is safe to do so:

- Implement safety-related measures.
- Mobilize fire control equipment, if needed.
- Don appropriate persona l protective equipment before entering the spill area.
- Remove all ignition sources from the security zone.

=> Contain the spill by isolating and immobilizing the spill. Construct containment ditches and berms or place absorbent material in front of flowing material.

=> Estimate the volume of material that was spilled.

=> The environmental specialist must determine if authorities or regulatory agencies need to be notified and make the notifications as required.

4.2 SPILL C LEANUP MATERIAL AND EQUIPMENT

Spill clean-up equipment and supplies and their storage locations are listed in Table 4-1.

Table 4-1 Spill Cleanup Equipment and Supplies

QUANTITY	EQUTPM ENT OR	STORAGE
5+	Spill Cleanup Kits	Near tanks, equipment, and totes/drums

4.3 SPILL CL EANUP PROCEDURES

=> If a large spill occurred or the spill reached a waterway, call a cleanup contractor and they will provide additional equipment to clean up the spill. Contact information is located in Table *5-2.*

=> **DO NOT** use water to clear the spill away! Water will mobilize the spill and require additional cleanup efforts.

=> Pick up free liquid that has collected in s umps or containment areas with spill cleanup kits. Place free liquid that has been collected in a tank or drums for temporary storage.

=> Clean up liquid that has spread over a non -porous surface with absorbent material such as oil-dry or absorbent socks or booms. Collect oil-soaked cleanup materials *(e.g.*, oil-dry. absorbent socks, or booms) and place them in leak-proof containers.

=> For spills on gravel or soil, absorb as much of the liquid as possible with absorbent material and then excavated the oil-contaminated gravel or soil down to visibly clean material. Place the excavated material in piles for temporary storage.

4.4 DISPOSAL PROCEDCRES

An oil s pill is not considered cleaned up until all waste produced during the cleanup activities are properly disposed. The environmental specialist is responsible for disposing oil- contaminated cleanup materials in accordance with federal, state, and local regulations. General guidelines are listed below: however, the exact means of disposal will depend on the nature and volume of contaminated material and whether the material is contaminated with other substances.

=> Liquid oil that has been collected should he recycled at an offsite facility, if possible, or disposed of at a regulated and licensed facility.

=> Ship oily soil that has been excavated to a landfill or land farm that is permitted to dispose of or treat oil- contaminated soil.

=> Dispose of oil-soaked absorbent material in a land fill permitted for this type of industrial waste.

4.5 FOLLOW-UP RESPONSE ACTION

=> The environmental specialist is to complete a Spill Report Form as out lined in Section 5.1 (blank forms are in Appendix *C).* Complete d Spill Report Forms will be maintained in Appendix D.

=> Conduct an investigation as needed to

- Determine the cause of the spill;
- Review the response actions that were taken to identify any improvements for response to future incidents; and,
- Determine if any measures need to be implemented to prevent another spill.

=> Revise this Plan to reflect any changes at the facility or in operating procedures that result from an evaluation of the spill.

=> Re place all spill cleanup equipment that was used during the cleanup of the spill.

5 Spill Reporting

Proper reporting of spills is very critical and must be done carefully, accurately, and in a timely manner. Table 5-1, at the end of the section, summarizes the spill reporting information out lined in Sections 5.1 through 5.4. A call list with contact names and telephone numbers is located in Table 5-2.

5.1 INTERNAL REPORTING REQUIREMENTS

The person who discovers an oil spill that is outside of a secondary containment area must immediately notify their Supervisor. The Supervisor must then notify the environmental specialist. If the Supervisor is unavailable, the person who discovered the spill must notify the environmental specialist directly.

For any oil spill or release outside of a secondary containment area, the Supervisor or the environmental specialist must complete a Spill Repot1 Form (located in Appendix C).

5.2 FEDERAL REPORTING REQUIREMENTS

The environmental specialist or designated representative will determine if an oil spill must be reported to federal agencies. If the spill is determined to be reportable, the environmental specialist or designated representative will complete the required notifications.

5.3 STATE REPORTING REQUIREMIENTS

The Environmental Manager or designated representative will determine if an oil spill must be reported to state agencies. If the spill is determined to be reportable. the Environmental Manager or designated representative will complete the required notifications.

5.4 LOCAL REPORTING REQUIREMENTS

Contact the Local Emergency Response Commission (LERC), or for an emergency call 911.

Table 5-1 Oil Spill Reporting Table

QUANTITY SPILLED	SPILL AREA	WHEN TO REPORT	REPORT TYPE	WHO REPORTS SPI LL	REPORT SPILLTO:
Any	Outside of a secondary containment area or building	Immediately	Verbal	Person who discovered the spill	Supervisor
Any amount that creates a sheen, film, or discoloration	Any location where a spill enters, or has the potential to enter a stream or natural body of water	Immediately	Verbal	Environmental specialist or designee	NRC UDEQ
>42 gallons - twice in any 12-month period	Any water source or outside secondary containment	Within 60 days	Written	Environmental specialist or designee	UDEQ
= o r > l.000 gallons	Any water source or outside secondary containment	Within 60 days	Written	Environmental specialist or designee	UDEQ
Any	Impact to waterfowl or endangered species	Immediately	Verbal	Environmental specialist or designee	UDEQ

Table 5-2 Spill Contact Information

CONTACT	CONTACT INFORMATION
Facility Response Coordinator: Clark Atwood	435.867.5331
Other Facility Contacts: • Environmental Specialist	435.691.1551
Federal Agency Contact Numbers: • National Response Center (NRC)	800.424.8802
State Agency Contact Numbers: • Utah Division of Responses and Remediation Emergencies	801 .536.41 23
• Utah DEQ Division of Water Quality	801 .538.61 46
Local Agency Contact Numbers:	
• Local Emergency Response Commission (LERC)	435.586.6511
•	911

6 Potential for Equipment Failure

The Coal Hollow facility was inspected to identify each area where a potential for an oil spill exists. The rate of flow of a spill could range from a small drip from a crack in a line or tank to an instantaneous spill caused by the rupture of a tank or container. Table 6-1 lists the sources that have a reasonable potential for equipment failure.

Table 6- 1 Potential for Oil Spills

	SOURCE.	TYPE of OIL	MAJOR TYPE of FAILURE		DIRECTION of FLOW	SECONDARY CONTAJNMENT
	Tunk	Diesel or gasoline	Leak		SW	Berm and pond system with a drop pipe spillway
	Generators	Diesel	Leak		SW	Berm and pond system with a drop pipe spillway
	Totes/ Dr ums	Diesel	Leak		SW	Berm and pond system with a drop pipe spillway

7 Containment and Diversionary Structures

The Coal Hollow facility will employ berm and pond systems. This is intended to prevent a discharge of oil to navigable waters of the United States. The berm and pond located near the facility operations and oil storage area will be equipped with a drop pipe spillway

8 Inspections, Tests, and Records

An inspect ion is conducted monthly at the facility. The inspection includes a visual inspection or all oil containers, oil-containing equipment, piping systems, and secondary containment areas. The blank inspection form located in Appendix E describes the steps to be taken during the inspect ion and will be us ed to document the monthly inspections. The inspection form will be signed by the person performing the inspection. The completed inspection forms will be submitted to and maintained by the facility engineer for a period of three years from the elate of the inspect ion.

Secondary containment pits are inspected for an oil sheen prior to discharging or draining any water from them. The inspection is recorded on the Secondary Containment Drainage Log, which is locate d in Appendix F.

Mechanical integrity testing of bulk oil storage tanks will be conducted as described in Section 12. Integrity testing records will be maintained while the tank is located at Coal Hollow.

9 Personnel Training

9.1 INITIAL TRAINING

All Alton Coal personnel who have the potential to handle oil will receive initial Spill Plan training. New employees or employees whose jo function change will receive the initial training within one month of beginning their assigned duties. The initial training will consist of classroom and/or hands-on training. The initial t raining will include the following topics:

- Operation and maintenance of equipment to prevent discharges:
- Spill response, cleanup, and disposal procedures:
- Applicable pollution control laws, rules, and regulations:
- General facility operations; and.
- The contents of this Plan.

9.2 DESIGNATED P ERSON

The environmental specialist has been designated as the person who is accountable for spill prevention at the Coal Hollow facility.

9.3 ANNUAL BRIEFINGS

Oil-handling personnel will participate in an annual briefing. The briefing will ensure that personnel have an adequate understanding of this Plan. They will be informed of any known discharges that occurred during the prior year. The response and cleanup actions that were taken and the mode of failure of each spill will be discussed. The refresher training will also include a discussion of any recently developed precautionary measures.

9.4 TRAINING RECORDS

All training will be documented. The documentation will include who attended the training and what was included in the training. Training records will be maintained in the Safety Office. Individual training records will be maintained for the length of employment of the employee.

10 Site Security

10.1 FENCING

Public access to the facility will be controlled by personnel that are trained to recognize and discourage unauthorized access, along with " No Trespassing" signs to deter public entry.

10.2 DRAIN VALVES

Valves permitting outward flow have adequate security measures to remain in the closed position when in non-operating/ non-standby status.

10.3 OIL PUMPS

Alton Coal has locked the starter control on each pump in the "off' position and has locate d it at a site accessible only to authorized personnel when the pump is in a non-operating or non-standby status.

l0.4 FACILITY PIPING

Piping is capped not in service or when in standby service for an extended time.

10.5 FACILITY LIGHTING

Due to night sky impact concerns in the surrounding area, the entire facility will not be lighted. However, there will be selective lighting. The outdoor lighting at the Coal Hollow facility is adequate to detect spills, inspect secondary containment structures, and to prevent vandalism during hours of darkness.

11 Facility Tank Car and Tank Truck Loading /Unloading Rack

11.l LOADING/ UNLOADING AREA CONTAINMENT SYSTEM

Transfer areas arc sloped to drain to a low area or catchment area that would serve to hold any spills on-site until it can be cleaned up.

12 Materials of Construction

The bulk storage containers located at the Coal Hollow facility and their material of construct ion are shown in Table 12-1. All of the bulk storage containers onsite are constructed of materials that are compatible with the material stored in them and the temperature and pressure of storage.

Table 12-1 Bulk Storage Containers

BULK STORAGE CONTAINER	CONTAINER CONTENTS	STORAGE PRESSURE	STORAGE TEMPERATURE	MATERIALS OF CONSTRUCTION
Oil and gas fuel tanks	Diesel oil or gasoline	Atm	Ambient	Steel
Totes/Drums	Oil	Atm	Ambient	Steel or plastic

INTEGRITY TESTING

The bulk oil storage tanks receive an external, visual inspection during the monthly inspection. An external inspection will be conducted by an authorized inspector every 5 years per the American Petroleum Institute (API) Standard 653.

Currently, the tank shell corrosion rate is not known and the diesel and gasoline tanks are less than five years old. Therefore, the first set of thickness readings on the tank shell will be obtained in 2014. The second set of thickness readings will be obtained five years after the first set in order to establish the corrosion rate of the tank shell. The thickness inspection interval will then be set at a maximum of 15 years and will be lower if the corrosion rate is higher than expected.

The bottom of the tanks can be accessed externally; therefore. the thickness of the tank bottom will be determined at the time the tank shell thickness is determined.

12.1 DISCHARGE PREVENTI ON FOR BULK STORAGE CONTAINERS

One of the following high liquid level devices is provided on each bulk oil storage container:

- High liquid level alarm with audible of visual signals
- High liquid level pump cutoff device
- Direct audible or code signa l communication
- A fast response system, including direct vision gauge (personnel present)

The liquid level sensing devices are tested regularly during inspections

12.2 VISIBLE DISCHARGES

All visible oil leaks will be promptly corrected. Leaks will be cleaned up and reported as outlined in Sections 4 and 5. respectively. Accumulations of oil within secondary containment areas will be promptly cleaned up and reported, if required.

12.3 MOBILE OR PORTABLE OIL STORAGE CONTAINERS

Mobile or portable containers are located such that any leakage is directed to secondary containment or catchment areas within the facility area.

12.4 FACILITY TRANSFER OPERATIONS

12.4.1 Pipe Supports

Based upon observations at the facility, the pipe supp orts for the oil transfer lines appear to be designed to minimize abrasion and corrosion and allow for expansion and contraction of the pipe lines

12.4.2 Piping Inspections

Aboveground valves, piping, and appurtenances are inspected during the monthly Plan inspection.

Appendix A Spill Plan Review Form

Spill Plan Review Documentation

"I have completed review and evaluation of the Spill Plan for the Coal Hollow facility in Utah on ___, 20 , and will / will not amend the Plan as a result."

_____ _____

Signature Date

_____ _____

Printed Name Title

For technical amendments to the Plan, the following certification from a Professional Engineer is required.

"I certify that the Alton Coal facility in Utah has been examined that this Spill Plan has been prepared in accordance with good engineering practices and industry standards, the required inspections and testing schedules have been established. and that the plan is adequate for the facility."

_____

Name of the Professional Engineer

_____

Registration Number

_____

State

_____

Date

Appendix B Completed Plan Review Forms

Appendix C Blank Spill Reporting Form

Spill Reporting Form

GENERAL INFORMATION

FACILITY NAME:_____PHONE NUMBER:_____

SPILL DISCOVEREDBY:_____TITLE:_____

PERSON REPORTING SPILL:_____TITLE:_____

DATE OF SPILL:_____TIME:_____

DATE SPILL WAS DISCOVERED:_____TIME:_____

DURATION OF THE INCIDENT:_____hours

MATERIAL SPILLED:_____

ESTIMATEDQUANTITY SPILLED:_____

AMOUNT RECOVERED: AMOUNT UNRECOVERED:

SPILL REPORTING INFORMATION

WHO WAS NOTIFIED OF THE SPILL? ____Supervisor ____Plant Engineer

_____ General Manager _____ Production Superintendent _____Alton Fire Dept.

WAS A REPORTABLE QUANTITY SPILLED? _____ YES _____ NO

WHICH AGENCIES WERE NOTIFIED OF THE SPILL? (Only the General Manager or his/her designee is authorized to make notifications):

UDEQ - DWQ	**UDERR**	**LEPC**
(801) 536-6146	(801) 536-4123	(435) 259-5602
Date:_____	Date:_____	Date:_____
Time:_____	Time:_____	Time: _____
Name:_____	Name:_____	Name:_____

National Response Center	**USFWS** - Spill Response **Coordinator**	Local Fire Department
(800) 424-8802	(801) 975-3330	911
Date:_____	Date:_____	Date:_____
Time:_____	Time:_____	Time:_____
Name:_____	Name:_____	Name:_____

SPILL INFORMATION

ESTIMATED QUANTITY THAT HAS, OR HAS THE POTENTIAL TO ENTER WATERS OF THE STATE OR UNITED

STATES:_____gallons NAME OF WATER BODY:_____

SPILL WAS RELEASED INTO (land. water, secondary containment, etc.):

WHERE DID THE SPILL GO OR WHICH DIRECTION DID THE SPILL TRAVEL?_____

ESTIMATED QUANTITY THAT WAS RELEASED OR MIGRATED OFFSITE:_____

WEATHER CONDITIONS:_____

EXACT LOCATION OF THE SPILL (include type of terrain. nearest waters or drains, direction the spill is moving as

applicable):

_____

SPILL INFORMAT/ON (continued):

SOURCE OF THE SPILL:_____

CAUSE OF THE SPILL (include equipment or activities involved in the spill):

_____

_____

WAS THE SPILL CONTAINED? _____YES _____NO

IF YES, HOW? _____

HAZARD/DAMAGE INFORMATION

IDENTIFY HEALTH HAZARDS OR CHARACTERISTICS:_____

_____

PRECAUTIONS THAT HAVE BEEN OR ARE BEING TAKEN: _____

_____

_____

LIST PERSONAL INJURIES, ENVIRONMENTAL DAMAGE, OR PROPERTY DAMAGE CAUSED BY THE SPILL

(environmental damage includes impacts to wildlife, wetlands, or other environmental resources):

_____

_____

EVACUATION NEEDED? _____ YES _____ NO

SPILL CLEANUP INFORMATION

OUTSIDE CONTRACTOR USED FOR SPILL CLEAN UP? _____YES _____ NO

CONTRACTOR'S NAME, IF USED: _____

CLEAN UP ACTIONS: _____

_____

_____

EFFECTIVENESS OF CLEANUP ACTIVITIES:_____

SPILL FOLLOW-UP

ACTION(S) TO BE IMPLEMENTED TO PREVENT FUTURE OCCURRENCES:_____

_____

_____

WAS THE PLAN REVIEWED AFTER THIS SPILL (applies only to oil spills)? _____ YES _____ NO

DOES THE PLAN REQUIRE MODIFICATION (applies only to oil spills)? _____ YES _____ NO

WAS THE SWPPP REVIEWED AFTER THIS SPILL (applies to spills other than oil)? _____ YES _____ NO

DOES THE SWPPP REQUIRE MODIFICATION (applies to spills other than oil)? _____ YES _____ NO

SIGNATURE: DATE:

Appendix D Completed Spill Reporting Forms

Appendix E Monthly Inspection Form

MONTHLY SPILL PLAN INSPECTION CHECKLIST

DATE: _____

TIME: _____

INSPECTOR:

√ = Satisfactory
N/A = Not Applicable
X = Repair or Adjustment Required (see comments under Problems Found

OIL STORAGE TANKS, DRUMS, and CONTAINERS

_____ Level gauges and alarms operating properly.

_____ No signs of deterioration on shell (*i.e.*, discoloration or flaking of coating, shell distortion, localized corrosion at welds, general corrosion, hairline cracks, or bulging).

_____ No damage or deterioration on supports, foundation, and anchor bolts (*i.e.*, cracking, distortion, buckling of supports or saddle, signs of settlement, corrosion, pitting, vehicle damage, or loose anchor bolts).

_____ No deterioration or leakage at pipe connections to container.

_____ No signs of leakage on container, foundation, or supports.

_____ Drain valves on tanks are closed and secured.

_____ Pressure relief devices, emergency vents, or relief vents are clean and free of obstructions.

_____ Mobile or portable containers are provided with secondary containment or located to prevent a discharge to water.

_____ Internal heating coils are operating properly and do not show signs of leakage.

SECONDARY CONTAINMENT AREAS

_____ No signs of leakage or spills, such as stained surfaces.

_____ Containment walls and floors are intact and are not cracked.

_____ Drainage from diked areas is restrained.

_____ Drain valves on dikes areas are closed.

_____ No visible oil sheen on water in containment areas.

_____ No standing water in containment areas.

SPILL CLEAN UP EQUIPMENT

_____ Spill kits contain proper equipment.

_____ Oil absorbent material is available.

VALVES/PIPELINES

_____ No signs of corrosion or damage on piping, valves, flanges, etc.

_____ Terminal connection of out-of-service pipes capped or blind-flanged and origin is marked.

_____ No leaks or signs of leakage at valves, flanges, or other fittings.

_____ No signs of abrasion or corrosion at pipe support locations.

_____ Piping, flanges, expansion joints, and pipe supports in good condition.

_____ Starter locked in 'Off' position on oil pumps when not in operation.

OIL-FILLED PROCESS and ELECTRICAL EQUIPMENT

_____ Equipment is operating properly.

_____ No signs of leakage.

_____ No rust, corrosion, or pitting on external surfaces.

_____ Equipment foundation/base in good condition.

_____ No oil sheen or runoff from around oil-containing equipment.

SECURITY

_____ Fence and gates in good condition.

_____ Gates around oil tanks/containers are locked.

_____ Facility lighting is adequate & working properly.

FACILITY DRAINAGE/TREATMENT

_____ No oil sheen or runoff around oil-containing equipment.

_____ No ruts or unusual drainage patterns around secondary containment areas.

_____ Effluent treatment system operating properly.

LOADING/UNLOADING AREAS

_____ Loading/unloading connections are capped or blind-flanged when not in service.

_____ A means to prevent premature departure of tank trucks is in place and used.

PROBLEMS FOUND: _____

_____

_____

CORRECTIVE ACTIONS: _____

_____

_____

Monthly Inspection Procedure

Observe the general condition of the facility and for conformance with the requirements in the facility' s SPCC Plan. The following areas must be observed during the inspect ion. If any problems are observed, make a note on the inspection form.

Oil storage tanks, drums, and containers:

- Drain valves on tanks are closed and secured.
- Inspect for signs of deterioration on containers shell *(i.e.,* discoloration or flaking of coating, shell distortion, localized corrosion at welds, general corrosion, hairline c racks, or bulging).
- Inspect for damage or deterioration on supports, foundation, and anchor bolts *(i.e.,* cracking, dis to1tion, buckling of support s or saddle, signs of settle men t, corrosion, pitting, vehicle damage, or loose anchor bolts.
- Inspect for signs of leakage on container, foundation, or supports.
- Pressure relief devices, emergency vents, or relief events are clean and free of obstructions.
- Level gauges and alarms operating properly.
- Mobile or po rt able containers are provided with secondary containment or located as to prevent a discharge to water.
- Internal heating coils are operating properly and do not show signs of leakage.

Oil-filled process and electrical equipment:

- Equipment is operating properly.
- Inspect for signs of leakage.
- Inspect for rust corrosion, or pitting on external surfaces.
- Equipment foundation/base in good condition.
- Inspect for oil sheen or runoff from around oil- containing equipment.

Diked areas or secondary containment areas:

- Containment walls and floors are intact and are not cracked.
- No visible oil sheen on water in containment areas.
- No standing water in containment areas.
- Inspect for signs of leakage or s pill s, such as stained surfaces.
- Drainage from diked areas is restrained.
- Drain valves on diked areas are closed.

Effluent treatment system: operating properly.

Loading/unloading areas:

- Loading/ unloading connections are capped or blind- flanged when not in service.
- A means to prevent premature departure of tank trucks is in place and used.

Monthly Inspection Procedure *(continued)*

Oil piping systems:

- Oil pump starters are locked in the OFF posit ion when not in operation.
- The terminal connect ion of out-of-service piping is capped or blind - flanged and origin is marked.
- Inspect for signs of abrasion or corrosion at pipe support locations.
- Inspect to r signs of leakage around pipe fittings, flanges, valves, instrumentation. and other fittings.
- Piping, flanges, expansion joints, and pipe supports in good condition *(i.e.*, no corrosion or damage).

Site security measures:

- Fencing and gates are in good condition.
- Gates around oil tanks / containers are locked.
- Facility lighting is adequate for discovering spills and working properly.

Spill Clean-up Equipment:

- Spill kits contain proper equipment.
- Oil absorbent material is available.

Appendix F Secondary Containment Drainage Log

SECONDARY CONTAINMENT DRAINAGE LOG

Record the following information every time water is drained from a secondary containment area.

DATE	TIME	INSPECTOR	SECONDARY CONTAINMENT AREA (1)	WATER DISCHARGED? (YES/NO)	REASON FOR DISCHARGE (2)	APPEARANCE OF WATER (3)	DESTINATION OF DISCHARGED WATER

NOTES:

(1) Record which secondary containment area is being inspected.

(2) Rain, leak, etc.

(3) Clear, cloudy, dirty, oil sheen, etc. Do not discharge the water if it has an oi l sheen or contains oil.