

0005

### Document Information Form

Mine Number: C/041/002

File Name: Internal

To: DOGM

From:

Person N/A

Company N/A

Date Sent: JULY 10, 1981

Explanation:

INSPECTION MEMO TO COAL FILE.

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cc:

File in:  
C/041, 002, Internal

Refer to:  
 Confidential  
 Shelf  
 Expandable  
Date \_\_\_\_\_ For additional information

July 10, 1981

Inspection Memo  
to Coal File:

#1

RE: Convulsion Canyon Mine  
Southern Utah Fuel Co.  
ACT/O41/002  
Sevier County, Utah

DATE: June 11, 1981  
TIME: 9:00 a.m.  
WEATHER: Fair, Warm  
COMPANY OFFICIALS: Kerry Frame, Mike Davis  
STATE OFFICIAL: Sandy Pruitt  
ENFORCEMENT ACTION: None

Compliance With Permanent Performance Regulations

7171.11 Permits

Final approval to mine was granted under the 1975 Act on September 14, 1972. A 211 Plan was submitted for OSM review under the Interim Program. Addendums to the plan, including monitoring plans and baseline data were submitted in 1979. The permanent mine plan submitted in November 1980, contains plans for new leases not included in the 211 submitted.

OSM granted permission on February 17, 1981, to extend mining into leases U-28297 and U-062453 near the North Submain (U-28297) concluding that no significant impact to facilities or production would occur and stipulating that a breakout planned for November 1981 would not impede wildlife.

Plans for a waste fill were approved on May 21, 1981, with stipulations that no ponding occur on the fill and that revegetation and overland diversion measures be implemented immediately.

NPDES permit #UT-0022918 was renewed on March 5, 1981, and expires on June 30, 1981. The permit covers mine water discharge (pt. 001) to East Spring Canyon, averaging 61,200 gpd and sediment pond discharge (pt. 002) which reportedly has never discharged.

817.11 Signs and Markers

Perimeter markers had not been posted yet. Mr. Frame was informed of the requirement to post perimeter markers no later than July 1, 1981.

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- Confidential
- Shelf
- Expandable

Refer to Record No. 0005 Date 7-10-81  
In C/ 041, 002 Internal

For additional information

817.21-.25 Topsoil

The settling cracks in the topsoil stockpile have been filled in since the last inspection.

817.41-.57 Hydrologic Balance

The water monitoring data examined was up to date. Excesses of NPDES permit conditions at site 001 (mine water discharge) from August through October 1980, were reported to EPA in January and a study was initiated to determine a correlation between TSS levels and mining activity. At this time, more data is required as no correlation was immediately evident. An excess in oil and grease was recorded from a sample dated August 18, 1980. Judd Hopkins of the State Health Department obtained a sample on November 11, 1980, that reportedly contained 189 ppm oil and grease in the mine water discharge. SUFCO representatives maintain that Mr. Hopkins was on site without their awareness and may have taken the sample from an unrepresentative location, e.g., from the sediment trap. Mine water discharge data from October through January did not contain any excesses of 10 ppm oil and grease. These samples were taken from the discharge pipe. Samples taken from the stream below the settling pond in March 1981, by Alberta Seierstad, Utah Research Lab at USU, contained lower oil and grease concentrations than samples from the discharge point. More samples are needed to confirm this observation. Oil and grease is accumulating on the rocks and shoreline for some distance below the pond discharge mixing point. It was requested that a permanent sampling point be established below the mixing point. Ms. Seierstad's research may accomplish this during the interim.

SUFCO is constructing underground diversions to channel the mine water through old workings underground so that the oil and grease and TSS will settle out even more before being discharged to the settling pond. This should be fully operational by September 1981. SUFCO was preparing the truck turnaround for paving which should reduce the TSS levels in surface drainage.

Drainage control from the newly completed storage pad is inadequate. Riprapped channels along either side of the fill protect the stability but drainage is not controlled on the lower pad. Mr. Frame committed to addressing this problem in a letter dated June 24, 1981.

817.71-.73 Disposal of Underground Development Waste and Excess Spoil

Waste is currently stored underground. Contrary to previous discussions, Mr. Frame maintained that SUFCO has no plans for developing a waste disposal site.

817.97 Protection of Fish, Wildlife and Related Environmental Values

UP&L power poles less than four years old service the mine operation. No hazard was apparent but it was recommended that Mr. Frame insure that, as required under this section by July 1, 1981.

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817.111-.115 Revegetation

Revegetation on the downslopes of the old fill was more successful than on the topsoiled downslope. The matted downslope was poorly revegetated.

817.121 Subsidence Control

Subsidence is monitored in biannual surface inspections accurate to within .01 feet. The last inspection was in October 1980. Subsidence has occurred since the high recovery production period started in June 1976. A maximum subsidence of 8.5 feet has occurred with an average of 4.5 feet since the start. Tension cracks are the only evident surface effects.

817.150-.176 Roads

Repair on the county access and haul road is completed. All roads within the mine area were adequately maintained.

817.181 Support Facilities and Utility Installations

Mr. Frame requested that DOGM refer to the borrow area established for the county road maintenance as Coastal States property exempt from the SUFCO mine operation. During the April 20, 1981 inspection, Mr. Frame committed to implementing environmental protection measures in consort with the performance standards. Stockpiled topsoil has not been adequately protected or redistributed for reclamation. SUFCO does not plan to redistribute the topsoil but will seed the subsoil in reclamation of the borrow area. The topsoil will remain stockpiled at this site and sold in the future. Mr. Frame maintains that this is Coastal States prospect, therefore, SUFCO is no longer responsible. I recommended that this be documented by Coastal States to release SUFCO of the reclamation responsibility.

SANDY PRUITT *SP*  
RECLAMATION OFFICER

cc: Tom Ehmett, OSM  
Inspection Staff

SP/btm

Statistics:

See Knight Mine memo dated June 16, 1981.