

### Document Information Form

Mine Number: CB41/002

File Name: Internal

To: DOGM

From:

Person N/A

Company N/A

Date Sent: JUNE 2, 1982

Explanation:

INSPECTION MEMO TO COAL FILE.

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\_\_\_\_\_

cc:

File in:  
CI 041, 002, Internal

Refer to:

- Confidential
- Shelf
- Expandable

Date \_\_\_\_\_ For additional information

June 2, 1982

Inspection Memo  
to Coal File:

RE: Southern Utah Fuel Company  
Convulsion Canyon Mine  
ACT/041/002  
Sevier County, Utah

DATE: May 4, 1982  
TIME: 10:15 a.m. - 1:30 p.m.  
WEATHER: Partly Cloudy, Cool  
COMPANY OFFICIALS: Kerry Frame and Mike Davis  
STATE OFFICIALS: Ken Wyatt and Joe Helfrich  
ENFORCEMENT ACTION: Issuance of NOV #82-7-4-1

Compliance With Permanent Performance Standards

771 et al Permits

Division approval letters examined are listed below:

1. A letter to mine under the Utah Mined Land Reclamation Act of 1975 from Ron Daniels of the Division dated September 14, 1977.
2. An approval letter to extend three entries (2 East, 3 North, 4 North) to the outcrops dated January 29, 1981, from Jim Smith of the Division. Note: 3 East is the recent breakout (February 1982); 1 East and 1 South are breakouts from several years ago.
3. A letter approving the upper pad extension from Ron Daniels dated May 21, 1981.
4. An approval letter to mine the two State leases (U-28297 and U-47080) dated December 7, 1981, from Jim Smith with stipulations from OSM. A letter of acceptance of the stipulations was received by DOGM on December 14, 1981, thereby completing the approval for these leases. The current roof control and ventilation plans as approved by MSHA have not been submitted to the Division as required in Stipulation D. These plans shall be forthcoming in the near future.

Other approvals and permits include:

1. An Environmental Protection Agency (EPA) SPCC plan dated November 10, 1978.

File in:

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 Shelf  
 Expandable

Refer to Record No. 0007 Date 6-2-82

In C/ 041, 002, Internal  
For additional information

2. The sediment pond construction permit dated August 5, 1980, from the Utah Department of Health, Division of Environmental Health. This permit allowed construction of the sediment pond with a 1.62 acre foot capacity designed for a 1.9 inch 10-year, 24-hour storm.
3. An air quality approval was observed from the Utah Department of Health, Division of Environmental Health dated March 3, 1981. This approval was at a coal production level of 2.2 million tons per year. An EPA PSD is not required since Sufco is considered a minor source of air pollution in the area.
4. A water rights certificate, #40776, was approved November 5, 1971, by the State Engineer Hubert Lambert. This appropriation allows for .5 cfs of mine water to be utilized for domestic and mining purposes.
5. Several Forest Service special use permits were examined and are listed below:
  - A. A special use permit for the installation of the water line, spring collector system, pumphouse, sanitary discharge and drainfield was issued November 10, 1977, from Hale M. Hubbard. This permit allows .70 acres of Fishlake National Forest land to be used for these facilities.
  - B. A special use permit issued July 29, 1975, allows .6 acres (50 feet by 50 feet) of Forest Service land to be used for the installation of a passive micro-wave reflector system. This reflector is located in the SW1/4 of the NW1/4 of Sec. 13, T. 22 S., R. 4 E.
  - C. A November 16, 1981, approval was given from Fishlake National Forest for the right-of-way for a 69 kv powerline.

#### 817.11 Signs and Markers

The mine entrance sign was clearly posted as required with the exception of an incorrect State ACT number. Perimeter markers are posted, however, some are difficult to see.

#### 817.21-.25 Topsoil

Topsoil adjacent to the sediment pond was seeded in April 1982. Terraces were carved on the slopes of this stockpile to retain moisture and reduce erosion.

817.42-.52 Hydrologic Balance

Runoff from the disturbed area currently flows on the surface through the lower mine yard (tipple area) into the sediment trap. Effluents from the sediment trap are discharged into the sediment pond. Sufco plans to install a culvert system in the lower mine yard area. This culvert system will convey water to the sediment trap and eliminate muddy conditions caused by the present surface drainage system. Mr. Frame stated he would submit plans detailing the culvert system before construction begins.

817.52 Surface and Ground Water Monitoring

Sufco was issued a NPDES permit, #UT-0022918, on September 21, 1981. This permit expires June 30, 1986, and allows discharge from two points: point 001 permits mine water discharge into the 72-inch undisturbed bypass culvert draining East Spring Canyon; point 002 is the sediment pond discharge. Both discharge sources flow into the natural drainage that empties into Quitchupah Creek at the bottom of the canyon. East Spring Canyon was flowing at the time of this inspection while Mud Hollow was not. The mine water discharge has a history of exceeding effluent limitation for total suspended solids and iron. To correct this problem, Sufco has been working to rechannel the flow of mine water through an old mined out section (see memo dated April 16, 1982) prior to discharge. This rechanneling will allow filtration and settling of sediment before being discharged. Sufco plans to have this work completed by May 15, 1982.

The sediment pond has been discharging for several months. No laboratory analyses have been received by Sufco for their March and April samples. A February 22, 1982 discharge sample contained total suspended solid levels at 194 mg/l. The Division had not been notified of this noncompliance sample result. As a result, NOV #82-7-4-1 was issued as follows:

NOV N82-7-4-1

Nature of the Violation:

Failure to report to the Division any sample results which indicate a NPDES permit violation. Failure to forward analytical results concurrently with written notice of noncompliance to the Division. Namely, the sediment pond discharge (NPDES point 002) sampled February 22, 1982. Total Suspended Solids of 194 mg/l and total iron of 2.73 mg/l.

Provisions of the Regulations, Act or Permit Violated:

UMC 817.52(b)(1)(ii)  
UMC 817.42(b)(1)(iii)

Portion of the Operation to Which Notice Applies:

Sediment pond discharge (NPDES discharge point 002).

Remedial Action Required:

Notify the Division of any and all noncompliance water quality results. Forward to the Division analytical results of any NPDES noncompliance data concurrent with written notification of said noncompliance. This includes both discharge points (NPDES point 001 and 002). Ensure that future noncompliance results are sent to the Division.

Time for Abatement:

Send notification of noncompliance samples to the Division with analytical results. Fifteen (15) days, no later than May 19, 1982.

UMC 817.71-.73 Disposal of Underground Development Waste and Excess Spoil and Nonacid and Nontoxic-forming Coal Processing Waste

Underground development waste when generated is gobbled in mined out sections of the underground workings.

817.89 Disposal of Noncoal Waste

Noncoal waste is hauled several times weekly to the Salina landfill.

817.99 Slides and Other Damage

The slide that occurred in March 1982 apparently has dried out and stopped slipping. This area is still being monitored weekly for any further movement.

817.111-.117 Revegetation

The topsoil stockpile was reseeded in April 1982. The access road to the sediment pond was seeded in November 1981. These reseeded areas should be examined on subsequent inspections to determine revegetation success.

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817.121-.126 Subsidence Control

Sufco has about 45 subsidence monitoring stations. These stations are surveyed semi-annually and any subsidence is detected from the differences in elevation. Some surface subsidence has been detected. Subsidence monitoring data should be more closely examined on future inspections.

*Ken Wyatt*  
KEN WYATT  
RECLAMATION OFFICER

cc: Tom Ehmett, OSM  
Kerry Frame, Sufco  
Inspection Staff

KW/btb

Statistics:

See Genwal Coal Company memo dated May 17, 1982  
Grant: A & E