



0019

STATE OF UTAH  
NATURAL RESOURCES & ENERGY  
Oil, Gas & Mining

Scott M. Matheson, Governor  
Temple A. Reynolds, Executive Director  
Cleon B. Feight, Division Director

4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

December 14, 1982

Mr. Ken Payne  
Southern Utah Fuel Company  
P.O. Box P  
Salina, Utah 84654

# 4 + 3

RE: Approval of Storage Area  
Modification  
Convulsion Canyon Mine  
ACT/041/002  
Sevier County, Utah

Dear Mr. Payne:

The Division has completed its review of SUFCO's November 16, 1982 submittal concerning the proposed construction of a salt and sand storage area, oiled-stoker coal storage area and enlargement of the lump coal storage pad. We hereby grant formal approval to the above modifications as proposed with the exception of the stoker coal storage.

The Division is concerned about the proposed open stockpiling of the oiled-stoker coal and the potential for runoff of oil during rainfall events. At an application rate of two gallons of oil per ton of coal, approximately 2,000 gallons, or 42 barrels, of oil could be present at the stoker stockpile with an average storage of 1,000 tons. The volume of oil which could potentially be delivered to the sediment system would probably be less than this value due to adsorption of some oil by the slack coal.

After a review of the water quality data from the discharge below the pond (#002), it was found that during the last two years two samples resulted in oil and grease values above the maximum limit and seven samples showed some presence of oil and grease (approximately 2.0 mg/l). Additionally, a preliminary conclusion drawn from the current technical analysis of the MRP indicates that the sedimentation pond may be underdesigned for the 10 year, 24 hour design storm. Therefore, a runoff event of less than this magnitude could result in an oil discharge from the emergency spillway since it is not equipped with an oil skimming device.

In consideration of the above, approval for the proposed stoker stockpile is hereby granted with the following provisions:

1. The Division supports the Department of State Health's recommendations for containment of oil at the stockpile and installation of an impervious layer at the storage area to prevent any potential oil infiltration. Construction of this area should be delayed until these concerns are resolved.

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2. The Division strongly recommends containment of the oil at the stockpile site pursuant to UMC 817.89, Disposal of Non-coal Wastes:

" wastes including...greases, lubricants, flammable liquids ... shall be placed and stored in a controlled manner in a designated portion of the permit area ..."

" Placement shall ensure leachate and surface runoff do not affect surface or groundwater ... and area remains suitable to reclamation and revegetation."

The Division believes that the function of the sedimentation system is not for storage of these wastes.

3. The results (if available) of a chemical analysis of the oil to be applied to the coal, to include heavy metals and trace elements, should be submitted within 60 days.

4. A contingency plan for the handling and disposal of excess oil accumulation in the sedimentation pond(s) and mitigation of the problem should oil concentrations increase beyond current effluent standards should be developed and submitted to the Division within 60 days.

5. SUFCO should keep the Division advised of any developing problem(s) relative to the stoker stockpile and oil concentrations.

If you have any questions concerning this matter, please don't hesitate to contact myself or Rick Summers of my staff.

Sincerely,



JAMES W. SMITH  
COORDINATOR OF MINED LAND DEVELOPMENT

JWS/RS/tck

cc: Rick Summers, DOGM  
Wayne Hedberg, DOGM  
Susan Linner, DOGM  
Ken Wyatt, DOGM  
Doug Maier, DOGM  
Steve McNeal, State Health Department