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Copy to Sue, Dave D., Rick Sandy.

United States Department of the Interior
OFFICE OF SURFACE MINING
Reclamation and Enforcement
BROOKS TOWERS
1020 15TH STREET
DENVER, COLORADO 80202

SEP 27 1983

JIM
SEP 29 1983

Mr. James W. Smith, Jr.
Coordinator of Mined Land Development
Division of Oil, Gas and Mining
4241 State Office Building
Salt Lake City, UT 84114

Dear ~~Mr. Smith:~~ Jim

Attached is a letter received from the Fishlake National Forest concerning their study of mine discharge problems from the Convulsion Canyon. Their concerns are detailed with supporting data. Please bring these concerns to the attention of your hydrologists for consideration and resolution with the applicant as the repermitting review continues. A copy has also been sent to our inspectors in the Albuquerque field office, for appropriate action.

Also attached is a copy of the Manti-La Sal National Forest concerns.

As always, if you have any questions, please contact either Louis Hamm or Walter Swain at (303) 837-3806.

Sincerely,

Stephen F. Manger

Stephen F. Manger
Task Force Leader

Enclosure

cc: Rick Summers, UDOGM
Dave Darby, UDOGM

RECEIVED
SEP 30 1983
DIVISION OF
OIL, GAS & MINING

United States Department of Agriculture
Forest Service
Manti-LaSal National Forest
599 West Price River Drive
Price, Utah 84501

Reply to: 2820

Date: September 14, 1983

Mr. Walter Swain
Office of Surface Mining
Brooks Towers
1020 15th Street
Denver, Colorado 80202

Dear Mr. Swain:

Personnel on the Manti-LaSal National Forest have reviewed the ACR response as requested in your letter.

Most of the land involved in the review is fee land, or is within the boundary of the Fishlake National Forest. One concern identified is the long-term protection to the stream channel and its associated habitats. How long does SUFCO plan to monitor subsidence and related changes in surface and underground flows? What underground reclamation methods have been proposed to keep from losing Quitchupah Creek, since coal support structures will eventually fail?

We appreciate the opportunity to respond.

Sincerely,

W H Bailey
for
REED C. CHRISTENSEN
Forest Supervisor

United States Department of Agriculture

Forest Service

Fishlake NF

Reply to: 2820

Date: September 12, 1983

OSM-WTC
1983 SEP 16 AM 9:24
WESTERN TECHNICAL CENTER

Mr. Walter Swain
Office of Surface Mining
Brooks Towers
1020 15th Street
Denver, CO 80202

Dear Mr. Swain:

For some time now there has been concern with the water quality downstream from the Southern Utah Fuel Company's (SUFCo's) Convulsion Mine in Sevier County, Utah. Even though considerable effort has been made to protect the water from the adverse effects of mining activities, water quality in East Spring Canyon below the mine has been and continues to be seriously degraded.

Water affected by the mine's activities drains into East Spring Canyon from two areas. One is the mine yard area where surface runoff is channeled through a sedimentation pond before it is released into the natural drainage channel. The other is the underground working of the mine where water is produced, treated, and then discharged into the channel. The point of discharge from the underground workings is the upper end of the buried 72" culvert which passes through the mine yard area and opens into the natural drainage channel downstream from the mine facilities.

For the past 4-5 years the Forest has sporadically sampled the water quality in the East Spring Canyon's natural drainage channel below the mine. Three samples collected in 1982 exceeded the National Pollution Discharge Elimination System (NPDES) effluent limitations stated in SUFCo's discharge permit. On May 5, 1982, suspended solids measured 137 mg./l.; on July 13 and September 9, 1982, total dissolved solids measured 700 mg./l. and 1,120 mg./l., respectively. Maximum daily effluent limitations, as stated in the NPDES permit, are 70 mg./l. for suspended solids and 650 mg./l. for total dissolved solids. In July 1981, the water was black in color and oil and grease was evident on the water's surface. On February 26, 1980, samples measured 1,120 mg./l. of oil and grease and 16, 180 mg./l. of suspended solids. On March 7, 1979, water samples measured 4,920 mg./l. of suspened sediment. In, addition, SUFCo reported several violations to the Environmental Protection Agency in 1982 and 1983.

We are greatly concerned over this spring's release of accumulated contaminants from the sediment pond into East Spring Canyon when the pond was allowed to overflow. The pond's overflow structure has no means of withholding contaminants when the capacity of the pond is exceeded. Southern Utah Fuel Company recently took major action to maintain the pond's capacity by removing sediment deposits from the pond, but only after the pond had over-

flowed carrying contaminant into the natural stream channel.

The present manner of monitoring the pond and maintaining its capacity is apparently not working since adequate action was not taken to prevent the overflow incident. We would like to have necessary measures developed into the structure, if possible, which would ensure the situation does not reoccur. It seems illogical to concentrate the contaminants and then allow them to be released at a later time, such as when a heavy-water event occurs.

Another possible source of contamination which concerns us is the waste material (wash water, mud, coal dust, and petroleum products spilled or lost from equipment during servicing, etc.) from the equipment maintenance shop. We have been unable to identify the method used by SUFCo in disposing of this material. We wonder if this waste material is being drained directly into the buried 72" culvert which in effect is putting it directly into the stream channel and bypassing any filtering or treatment facilities. We feel this should be explored as a possible "leak" in the system and could perhaps account for the large amounts of oil and grease, coal dust, and other contaminants found in the drainage below the mine operations.

In summary, a major concern of the Forest is that water downstream from SUFCo's mining operation has not been in total compliance with the provisions of 30 CFR 817.41 and 817.42, and equivalent provisions of the State's approved program. This stems from the 3 concerns discussed above:

1. Is the design of the sediment pond adequate to ensure that contaminants are properly contained if overflows do occur;
2. Does the water discharged from the underground working of the mine meet NPDES effluent limitations; and
3. Is there water and/or waste material from surface facilities being discharged directly into the stream channel which should otherwise be handled to meet effluent limitations?

We are submitting this for your consideration in the processing of SUFCo's permit application and your analysis of the associated mine plan.

If there are any questions or comments, please contact District Ranger Charles R. Allred or Mr. Lynn Findlay at FTS: 584-8292.

Sincerely,

J. Kent Taylor

J. KENT TAYLOR
Forest Supervisor

cc: District Ranger, Richfield Ranger District
Richfield, Utah 84701