

October 5, 1984

TO: Memo to Coal File, Inspection and Enforcement
 FROM: Sandy Pruitt, Mining Field Specialist *SP*
 RE: Southern Utah Fuel Company, Convulsion Canyon Mine,
ACT/041/002, Folder #7, Sevier County, Utah

DATE: September 19, 1984
 TIME: 11:45 a.m. - 2:30 p.m.
 WEATHER: Partly Cloudy, pending rain showers
 COMPANY OFFICIALS: Mike Davis, Wes Sorenson
 STATE OFFICIALS: Tom Wright, Sandy Pruitt
 ENFORCEMENT ACTION: None

Compliance With Permanent Performance Standards

UMC 771 et al Permits

The DOGM Mining Permit was available for inspection as required. Only one approval has been granted separately from the permit application during the last quarter. On July 5, 1984, DOGM authorized slope stabilization plans to install a Hilfaker retaining wall behind the office. The July 5, 1984 approval included one stipulation that SUFCO provide sedimentation controls prior to reseeding the disturbed slope in the fall. Installation of the Hilfaker wall was started September 11, 1984.

In a letter dated August 9, 1984 the Utah State Department of Health denied SUFCO's request for a variance to effluent limitations and a new TDS limit of 1500 mg/l at NPDES discharge point 003. The variance could not be granted due to lack of support information. The State Health requested that SUFCO continue to monitor inflows to the sediment pond. Mr. Sorenson reported an improvement in the water quality of inflows to the sediment pond since regeneration brine from the water softener in the steam cleaner building was rerouted. Conductivity measures of decant discharges in August indicated acceptable TDS levels.

UMC 817.11 Signs and Markers

The mine entrance sign, buffer zone markers, topsoil and perimeter markers were all in place where required.

UMC 817.23 Topsoil

The topsoil stockpile located below the sediment pond embankment was inspected and remains stable and well vegetated.

UMC 817.41-.57 Hydrologic Balance

All runoff control measures inspected were well maintained and appeared functional. A new undisturbed drainage diversion ditch was installed along the base of the slope behind the material storage shed in response to deficiencies noted in the permanent program permit application. NPDES discharge point 001 was discharging at the time of this inspection. Water quality appeared good. Discharge from point 001 is authorized by the current NPDES permit but it was requested that SUFCO determine if mine water discharges from point 001 need to continue and report their intentions to DOGM. There was no flow in East Spring or Mud Creek drainages.

SUFCO lowered the water level in the sediment pond to the level of the decant valve twice in August to dewater the pond when the water quality would meet effluent limitations, in order to provide sufficient capacity for heavy storm events. The pond was decanted from 12:00 to 4:00 p.m. on August 9, 1984. There was no inflow to the sediment pond. Within one week a heavy storm with .78 inches precipitation raised the water level in the sediment pond to within two feet below the principle spillway. SUFCO recently installed a weather station at the mine site. From August 14 to August 27, 1984 SUFCO received 2.37 inches precipitation to raise the pond water level to within one foot of the principle spillway. SUFCO decanted the sediment pond again on August 27, 1984.

Complete and adequate pond inspection reports are available up to August 8, 1984. SUFCO provided a certification of the modifications to the sediment pond in accordance with UMC 817.46 (r). Wes Sorenson (PE No. 5369) certified the as built sediment pond designs based upon surveys conducted during the construction.

Water quality surveys are continuing in the mine to determine the source of TDS released at NPDES discharge point 002. Dr. Winget has conducted a macroinvertebrate survey in Quitcupah Creek. Several seeps in the area were sampled and the geology of the terrain was be recorded. SUFCO determined that TDS levels have increased with the decrease in discharge volume generated. All results are inconclusive to date. A report is forthcoming.

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UMC 817.-.117 Revegetation

SUFCCO plans to hydromulch the slide area along the road, the road repairs and the Hilfaker wall and fences this fall.

UMC 817.121-.126 Subsidence Control

SUFCCO recently monitored for subsidence over the 3R1W panel. No significant elevation changes were noted. SUFCCO monitors for subsidence monthly as an indication of mining conditions. Section 2R1W has been pillared near completion. Section 3R1W is currently being pillared, mining in section 5E approaches the outcrop and the sand channel located in section 4N2E has not been encountered there. Mining in section 2R4E is near completion and mining is underway in section 2L4E. A pillar panel is underway in section 1L2W.

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cc: Donna Griffin, OSM
Joe Helfrich, DOGM
Barton Kale, DOGM
Sue Linner, DOGM

Statistics: See J. B. King memo dated October 5, 1984
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