



File ✓ RE 10-13-87

gch SC 10/9/87

355 W. North Temple • 3 Triad Center • Suite 350 • Salt Lake City, UT 84180-1203 • 801-538-5340

INSPECTION REPORT

INSPECTION DATE & TIME: 9-11-87
8:30 to 4:30

Permittee and/or Operators Name: Southern Utah Fuel Co.
Business Address: P.O. Box P Salina, Ut 84654
Mine Name: Convulsion Canyon Permit Number: ACT/041/002
Type of Mining Activity: Underground Surface Other
County: Sevier
Company Official (s): Mike Davis
State Official(s): Holland Shepherd
Partial: Complete: Date of Last Inspection: 8-5-87
Weather Conditions: clear, sunny, warm
Acreage: Permitted 6194.75 Disturbed 27.79 Regraded 0 Seeded 0 Bonded 27.7
Enforcement Action: N87-9-9-1

COMPLIANCE WITH PERMITS AND PERFORMANCE STANDARDS

	<u>YES</u>	<u>NO</u>	<u>N/A</u>	<u>COMMENTS</u>
1. PERMITS	(X)	()	()	(X)
2. SIGNS AND MARKERS	(X)	()	()	()
3. TOPSOIL	(X)	()	()	()
4. HYDROLOGIC BALANCE:				
a. STREAM CHANNEL DIVERSIONS	(X)	()	()	()
b. DIVERSIONS	(X)	()	()	()
c. SEDIMENT PONDS AND IMPOUNDMENTS	(X)	()	()	(X)
d. OTHER SEDIMENT CONTROL MEASURES	(X)	()	()	(X)
e. SURFACE AND GROUNDWATER MONITORING	(X)	()	()	()
f. EFFLUENT LIMITATIONS	(X)	()	()	(X)
5. EXPLOSIVES	()	()	(X)	()
6. DISPOSAL OF DEVELOPMENT WASTE AND SPOIL	(X)	()	()	()
7. COAL PROCESSING WASTE	()	()	(X)	()
8. NONCOAL WASTE	(X)	()	()	()
9. PROTECTION OF FISH, WILDLIFE AND RELATED ENVIRONMENTAL VALUES	(X)	()	()	()
10. SLIDES AND OTHER DAMAGE	()	()	(X)	()
11. CONTEMPORANEOUS RECLAMATION	()	()	(X)	()
12. BACKFILLING AND GRADING	()	()	(X)	()
13. REVEGETATION	(X)	()	()	()
14. SUBSIDENCE CONTROL	(X)	()	()	()
15. CESSATION OF OPERATIONS	()	()	(X)	()
16. ROADS				
a. CONSTRUCTION	()	()	(X)	()
b. DRAINAGE CONTROLS	(X)	()	()	()
c. SURFACING	(X)	()	()	()
d. MAINTENANCE	(X)	()	()	()
17. OTHER TRANSPORTATION FACILITIES	(X)	()	()	()
18. SUPPORT FACILITIES				
UTILITY INSTALLATIONS	(X)	()	()	()

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PERMIT NUMBER: ACT/041/002

DATE OF INSPECTION 9-11-87

(Comments are Numbered to Correspond with Topics Listed Above)

1. PERMITS:

NOV 87-9-9-1 was issued because of the operator's failure to respond to the State Permit stipulations in a timely manner. The permit was issued on May 19, 1987. Section 15 (Special Conditions) requires that the permittee comply with the federal and state stipulations described on attachments A and A-1 of the permit. Also this section requires the operator to respond in writing to adjust or amend any of these stipulations.

The operator's representatives have met twice with Division officials over the last three months to discuss the various stipulations. According to Division staff the operator had committed to making a formal response to the permit stipulations at both of these meetings. At this point in time no formal response has been made.

The operator has indicated to me that most of these stipulations have already been resolved, or that the operator is actively working on a resolution. However, the Division feels that a formal response is required to ensure that the stipulations are being resolved in a timely manner. One stipulation in particular remains unaddressed by the operator, USFS #3, which had a 60 day limitation attached.

4.f EFFLUENT LIMITATIONS:

The operator's NPDES discharge monitoring reports are current through July of 1987. The only point discharging over the last three months has been point 003, at the Quitchupah breakout. The operator has recorded three occasions when this particular discharge did not meet the 650 mg/l limitation of the current NPDES permit. These dates and figures include the following:

June 87	702 mg/l and 665 mg/l
August 87	712 mg/l

Mailed to: Mike Davis, Brian Smith
Given to: Joe Helfrich

Inspector's Signature and Number: Holland Shepherd #9 Date: 9-23-87

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PERMIT NUMBER: ACT/041/002

DATE OF INSPECTION 9-11-87

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On all three occasions above the operator notified the proper regulatory authorities within the 5 day time limitation after receipt of their results.

The operator showed me a copy of a draft NPDES permit, dated 7-1-87, sent to them from State Health. The draft permit indicates that the State intends to increase the TDS limitations for discharge point 003 from 650 mg/l to 800 mg/l. I later phoned Mr. Steve McNeil of the Dept. of Health, on 9-15-87, and asked him to verify the Department's intent to increase the TDS limitation. He informed me that the Dept. of Health has certified the draft NPDES permit and has returned it to EPA for final approval as of 8-18-87. He also informed me that he felt that the operator had taken the proper steps in notifying the State about the TDS effluent violations and requesting an increase for that particular limitation in their permit.

Mr. McNeil did indicate that the Dept. of Health would be looking for a salinity study from the operator which would demonstrate compliance with the Colorado River Basin Salinity Control Forum's 1982 Intercepted Groundwater Policy. This will be a stipulation attached to the operator's new NPDES permit.

4.c SEDIMENT PONDS AND IMPOUNDMENTS:

The operator needs to keep the coal storage pile away from the upper sediment trap to avoid blockage of that facility. Some coal had slipped off the pile into the structure, but did not totally interfere with the function of the settling basin.

4.d. OTHER SEDIMENT CONTROLS:

All sediment controls were functioning adequately on the site. I asked the operator to clean out some accumulated sediment along the east road CBE diversion ditch, which might act to diminish the function of that facility.

Inspector's Signature and Number: Holland Shepherd #9 Date: 9-23-87