



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Norman H. Bangerter

Governor

Dee C. Hansen

Executive Director

Dianne R. Nielson, Ph.D.

Division Director

355 West North Temple

3 Triad Center, Suite 350

Salt Lake City, Utah 84180-1203

801-538-5340

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TO: Susan Linner, Permit Supervisor

FROM: Mike DeWeese, Reclamation Hydrologist *MD*

RE: Mid-Permit Term Review, Southern Utah Fuel Company,
Convulsion Canyon Mine, ACT/041/002, Folder #2, Sevier
County Utah

SUMMARY:

The Division has completed the mid-permit term review of the Convulsion Canyon Mine Mining and Reclamation Plan (MRP). The current plan is in need of reorganization to consolidate and update information presented therein. The current MRP appears to be complete but cannot be determined technically adequate at this time.

ANALYSIS:

UMC 771.23 Permit Applications - General Requirements For Format And Contents

Information presented in the MRP is organized chronologically by correspondence documents dating back to the original MRP submitted in 1979. As reviews were conducted and various submittals included in the MRP over the years, the original submitted information was not updated and deleted when necessary. As a result, the plan contains conflicting and often inaccurate descriptions of the current mine facilities. Therefore the operator must initiate a reorganization process to update the MRP and present the required information in a clear and concise manner. The text should be organized by major topics such as engineering, hydrology, soils, vegetation, etc. with supporting calculations and data presented in attending appendices. Outdated plans should be deleted from the text (e.g. references to "proposed" designs which have been constructed) as should old Division review documents. The reorganized MRP should be consolidated to present only designs and descriptions of the current facilities implemented at the Convulsion Canyon Mine. Information such as consultants reports and past review documents may be included in appendix form if the operator so wishes.

Mid-Permit Term Review
Southern Utah Fuel Company
Convulsion Canyon Mine
ACT/041/002

UMC 817.46 Hydrologic Balance: Sedimentation Ponds - MMD

UMC 817.49 Hydrologic Balance: Permanent and Temporary Impoundments
- MMD

UMC 817.46 (r) requires that sedimentation ponds shall be certified after construction by a registered professional engineer. Drawing 83-5 depicts the as-built volume configuration of the sedimentation pond but is not certified. The operator must revise this drawing to include the certification stamp of a registered P.E.

A certification report pursuant to UMC 817.49 (h) could not be located in the MRP. The operator must submit a certification statement for direct insertion into the MRP addressing the items enumerated by this regulation.

UMC 817.52 Hydrologic Balance: Surface and Groundwater Monitoring -
MMD

Although several monitoring reports and corresponding data submittals were found, details of the current monitoring program were not located in the MRP. The operator must submit a detailed description of the present water quality monitoring program implemented at the mine including sampling frequency, parameters analyzed, and methodology.

RECOMMENDATIONS:

The Division recommends that the operator initiate the reorganization of the MRP to achieve a consolidated and updated submittal presenting information in a clear and concise format by the five year repermitting review. A submittal schedule should be formulated at this time to ensure that the reorganized plan is completed in a timely manner thereby facilitating the review process.