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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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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 operator's Mid-Term Review response, received November 22, 1989 has been reviewed. The response is not technically adequate. Detailed comments are contained in the following analysis.

ANALYSIS:

UMC 771.23 Permit Applications: General Requirements for Format and Contents - MMD

The operator has submitted a schedule for reorganization of the MRP as required.

UMC 817.42(2)(3) Hydrologic Balance: Water Quality Standards and Effluent Limitations -MMD

The operator has identified and described all disturbed areas associated with the mining operations which do not drain to a sedimentation pond. These areas, classified as Alternate Sediment Control Areas (ASCA's) under current Division policy, are enumerated on pages 36b & c in Volume 8 of the MRP. ASCA's have also been labeled and identified on the appropriate maps in the MRP. The operator has adequately addressed the requirements of this regulation.

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 of the sedimentation pond but is not certified. The operator must revise this drawing or other appropriate maps to include the certification of a registered P.E.

UMC 817.52 Hydrologic Balance: Surface and Ground Water Monitoring - MMD

The operator has referenced the 1981 submittal in Volume 4 (page 20) as the current water monitoring program. Table 3 on page 18 provides a list of surface water sampling sites and sampling schedule. This schedule requires sampling surface waters two times per year. The operator is currently sampling three times per year. The Division feels the current sampling schedule being followed is adequate. However, the schedule presented in Table 3 must be updated to reflect the current practice of three samples per year and identify specific sample target dates (e.g. May/June, August, October).

Water quality reports show that no data has been collected since 1983 from sampling sites 022 and 030 due to no flow. These sites are located in ephemeral channels above the mine facilities. These channels have in fact conveyed runoff from precipitation events during this period but are normally dry. Because these channels only flow during storm events, the sampling schedule in Table 3 is not appropriate. The operator must commit to sampling these sites during precipitation events which produce runoff. The Division recommends that the operator install single stage sampling devices similar to the US-59 sampler in conjunction with crest gages at sample sites 022 and 030. This will allow automatic sample collection during flashy events and a record of the peak stage height. These devices are inexpensive and easy to maintain.

Water quality reports for sample sites 021 and 062 do not contain flow data from 1983 to the present. The operator must submit this missing data for these sites and include flow values in all future reports, as per Table 4 on page 20.

Table 3 on page 19 lists groundwater sampling sites 060, 061, and 062 (#1 entry), as part of the current sampling program. Mine personnel have indicated to Darron Haddock (UDOGM) that these sites are no longer accessible and have been discontinued from the sampling program. The operator must revise Table 3 to include only active sample sites in the current monitoring program.

Map 2 of the Waste Rock Disposal Site shows the locations of monitoring wells. Well labels on the map do not correspond to identification labels in the water quality report. The operator must clarify this discrepancy to present consistent identification of monitoring wells.

RECOMMENDATIONS:

The operator has not adequately responded to the Division's comments under UMC 817.46 and 817.49. The water quality monitoring program contained in the MRP needs to be updated. Additional deficiencies in the monitoring program have been identified. The Division recommends that the Mid-Permit Term Review be continued until these issues have been resolved.

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