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

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April 10, 1997

To: File

Thru: Joe Helfrich, Permit Supervisor-Compliance *JH*

From: Peter Hess, Reclamation Specialist III *PH*

Re: Appendix 7-6, SPCC Plan, M&RP Update for Chapter 7, Canyon Fuel Company, LLC, SUFCO Mine, ACT/041/002-97A, Folder #2, Sevier County, Utah

SUMMARY:

Proposed changes to update Chapter 7 of the SUFCO Mine M&RP were received by the Price Field Office on April 1, 1997. The changes which have been made to the Spill Prevention Control and Countermeasure Plan (Appendix 7-6) are to keep the plan current with respect to field changes at the mine site. I have not reviewed any other portions of the submittal, except for the requirements of the current UPDES permit.

It is felt that the contents of the SPCC plan, as submitted, meet the requirements of the UPDES permit.

TECHNICAL ANALYSIS:

UPDES versus Storm Water Permit versus SPCC plan

I have also reviewed the storm water permit for the site, as it relates to the UPDES permit and the SPCC plan. The only deficiency which I can see is the fact that the Inventory of Exposed Materials which is required within the SUFCO storm water permit by page 13, paragraph (2) of the SUFCO UPDES permit #UT0022918 does not include the salt/sand mixture which is maintained at the mine site for road maintenance during the winter months. The storage bin for the mixture contains a sloped bottom which contains any brine which is created by a precipitation event.



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Any runoff which might escape would be routed through the sediment trap thence to the mine site sediment pond, UPDES #002A. This is a minor correction to Section 2.2.2 of the storm water permit which SUFCO may wish to make. Page 17, paragraph (10) of the SUFCO UPDES permit requires that the storm water permit address Salt Control Measures. I do not know if it is really necessary to address this, as it should be covered by the Inventory of Exposed Materials requirement.

ANALYSIS:

Although page 12, paragraph 4 of the UPDES permit does give the DOGM jurisdiction (through SMCRA) with regard to UPDES and storm water permits, the permits are issued by the Division of Water Quality. I think that all that is necessary is to make SUFCO aware of the aforementioned concerns and give them the opportunity to address them.

Should you have any questions, please contact me. Thank you.

sd
cc: Wes Sorensen, SUFCO, Salina