

Memorandum of Understanding
Oil, Gas & Mining / Bureau of Water Pollution Control
Intra-agency Correspondence Form

0035

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TO: Mike Herkimer (DEH)
FROM: Harold G. Sandbeck (DOGM)

DATE February 1, 1989

TO: _____ (DOGM)
FROM: _____ (DEH)

DATE _____

SUSPECTED ENVIRONMENTAL/NPDES PERMIT VIOLATION

Mine Name: Price River Complex/Castle Gate Coal Company

NPDES Permit Identification: UT-0024678

The above referenced permit limits discharge of the following
PARAMETERS TO: DOGM SAMPLING HAS DELINEATED

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

A copy of the sample results is attached for your information.

For the above referenced permit, describe the concern:

The above mentioned DOGM inspector was informed by the operator of an unpermitted point source discharge at the Castle Gate Preparation Plant facility. The raw water pond contains an overflow culvert which discharges on a daily basis. A map is attached which shows the raw water pond location. At this time, I have not field inspected this point source discharge to determine if other problems exist.

Following are concerns which need to be addressed:

- * Include this discharge point in the NPDES permit?
- * Does DEH require water samples and analyse from the operator to make a final determination?

Reference: MOU DOGM/DEH, DATE LAST REVISED December 22, 1988

(RESPONSE TO DOGM BY DEH WITHIN 10 DAYS OF RECEIPT BY DEH)

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SUSPECTED ENVIRONMENTAL/NPDES PERMIT VIOLATION

Mine Name: Price River Coal Complex / Castle Gate Coal Company.

NPDES Permit Identification: WT 0024678.

By return copy of this memo, DEH advises DOGM that this concern

Does { } Does not

INDICATE:

- Two (2) non-valid upsets (exceeded monthly average within a six (6) month period
- Third (3rd) non-valid upset following the above mentioned six (6) month period (Exceeded monthly average within a three (3) month period)
- Insignificant - Danger to health or the environment
- Chronic - Danger to health or the environment
- Seriously endangers health, safety of the public or environment
- Imminent environmental harm to land air or water resources

OTHER:

Visual air emission observed at source _____
on _____.

DEH RECOMMENDATION:

See attached sheet.

Reference: MOU DOGM/DEH, DATE LAST REVISED December 22, 1988

(RESPONSE TO DOGM BY DEH WITHIN 10 DAYS OF RECEIPT BY DEH)

DEH Recommendations:

This response regards a discharge of water from a raw water pond overflow culvert at the Castle Gate Coal Preparation Facility. If water is withdrawn from the Price River and no chemicals or pollutants are added or concentrated and the water is returned to the river, a permit would probably not be needed (R448-1-3.4). We feel that in this case R448-1-3.4 can be applied and Castle Gate Coal can divert the water and return the water to the Price River without the need of a permit provided no pollutants are added or concentrated. When the permit is renewed this evaluation should be included in the permit. In addition how the sediment is removed from the pond and it's disposal should be evaluated. ✓

MDH:pa
1571-2k

* Pond is being incorporated into MRP based on previous correspondence between DOGM & Castlegate. No need to pursue a UPDES discharge permit based on Health's position

LPS 2-21-85

Can we characterize this as a "diversion" or some other benign term and notify Castlegate accordingly?
