

March 23, 1989

TO: File

FROM: Harold G. Sandbeck, Reclamation Specialist

RE: Update On Notification Of An Apparent Violation (See February 2, 1989 Division Letter), Castlegate Coal Company, Price River Complex, ACT/007/004, Folder #5 and 7, Carbon County, Utah

The Division of Environmental Health responded to the Memorandum of Understanding (MOU) regarding an apparent UPDES permit violation at Castle Gate Coal Company's, Castle Gate Mine. For additional information, please see the attachment and the February 2, 1989 DOGM letter.

On March 10, 1989, the undersigned inspector called the Dick Nickerson Company in Salt Lake City, Utah (801-973-8888) about the water pumps used in the pump house fire station. It was determined that these water pumps (Aurora Pump) have been designed to be lubricated by water (not by oil and grease) and designed to leak. Mike Herkimer with the Division of Environmental Health was satisfied with the above information and indicated that a permit for this point would probably not be needed. Lab analysis of the pump house fire station and the Price River indicate no problem with oil and grease (See Attachment).

hgs
cc: S. Linner
1503R/23

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

PAGE 1 OF 2

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

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

DATE February 1, 1989

DATE _____

SUSPECTED ENVIRONMENTAL/NPDES PERMIT VIOLATION

Mine Name: Price River Complex/Castle Gate Coal Company

NPDES Permit Identification: UT0024678

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:

An unpermitted point source discharge was found at the Castle Gate Preparation Plant facility. During the pumping process from the raw water pond, leakage is discharged from the pump house via a sump (drain) which discharges into an undisturbed drainage. A map is attached which shows the pump house location. No oil and grease was detected within the pump house or in the undisturbed drainage.

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)

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

PAGE 2 OF 2

SUSPECTED ENVIRONMENTAL/NPDES PERMIT VIOLATION

Mine Name: Price River Complex / Castle Gate Coal Company

NPDES Permit Identification: UT 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 discharge of water from a pump house associated with the Castle Gate Coal Preparation Facility. If water from Price River is withdrawn and no chemicals are added and the water is returned to the river, a permit would probably not be needed. According to R448-1-3.4, "a user of surface water diverted from waters of the state will not be required to remove any pollutants which such user has not added before returning the diverted flow to the original water course, provided there is no increase in concentration of pollutants in the diverted water".

However, where there is concern that chemicals may be added either intentionally as part of treatment or inadvertently as a result of a leak or spill a Best Management Practice Plan is more likely to be required than a permit, depending upon the circumstance involved in the situation. In the case of Castle Gate Coal we are not sure whether any chemicals are being added particularly since the pump leaks, which may inadvertently cause a leaking of oil into the water.

Because we are unsure of exactly what is happening at that pump house, and we are not sure why the company does not fix the pump, we are unable to say whether a permit would be needed. However, we would require that the company fix the pump and until the pump is repaired monitor the water discharged for oil and grease by sampling or by visual observation. The sampling results or results of visual observations must be recorded such that inspectors can review the data. If there is any indication, as a result of the monitoring, of an oil leak, the discharge from the pump house should be discontinued until the oil discharge is stopped.

MDH:pa
1571k

we should implement a field amendment to the MRP that ensures oil and grease from the pump is contained on site. No need to require an NPDES/UPDES permit for this pump at this time based on Health's position

Memorandum of Understanding

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

PAGE 1 OF 2

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)

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

PAGE 2 OF 2

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 UADES discharge permit
based on Health's position

LJB 2-21-85

Castle Gate Rec Plant



RECEIVED
MAR 13 1989
DIVISION OF OIL
& MINING
PRICE UTAH

CLIENT: Oil, Gas, & Mining
3 Triad Center
Salt Lake City, UT 84180-1203

INVOICE NO: : 839
Date Samples Rec'd: 03/03/89

ATTN: Harold Sandbeck
~~Barren Haddock~~

P.O. 582938

Project:

LAB SAMPLE NO DATE	SAMP SAMPLE DESCRIPTION TIME	ANALYSES PERFORMED	RUSH CRG%	FEE
7195 03/02/89	900 PUMP HOUSE FIRE STATION	SOLIDS, (TDS) Dissolved	0	9.60
		SOLIDS, (TSS) Suspended	0	8.80
		SOLIDS, (SS) Settleable	0	8.00
		OIL & GREASE, Aqueous	0	20.00

WDM
Reviewed and Approved:

Invoice Date: 03/08/89

Total Due: \$ 46.40

Castle Gate Proj. Plant



ANALYTICAL REPORT

CLIENT: Oil, Gas, & Mining
3 Triad Center
Salt Lake City, UT 84180-1203

Date Samples Rec'd: 03/03/89
MSAI Group No.: 838

ATTN: *Harold Sandbeck*
~~Darren Haddock~~
Project:

LAB SAMPLE NO	SAMPLE DATE	SAMP TIME	SAMPLE DESCRIPTION	ANALYSES PERFORMED	RESULT
7194	03/02/89	900	PRICE RIVER BY FIRE STAT	SOLIDS, (TDS) Dissolved SOLIDS, (TSS) Suspended SOLIDS, (SS) Settleable OIL & GREASE, Aqueous	428 mg/l 39 mg/l <.5 ml/l <.2 mg/l

Respectfully submitted,

Warner R. Woolfenden

Warner R. Woolfenden, Ph.D.
Technical Director

Castle Gate Prep Plant



ANALYTICAL REPORT

CLIENT: Oil, Gas, & Mining
3 Triad Center
Salt Lake City, UT 84180-1203

Date Samples Rec'd: 03/03/89
MSAI Group No.: 839

ATTN: ~~Harold Sandbeck~~
~~Darren Haddock~~

Project:

LAB SAMPLE NO DATE	SAMP SAMPLE DESCRIPTION TIME	ANALYSES PERFORMED	RESULT
7195 03/02/89	900 PUMP HOUSE FIRE STATION	SOLIDS, (TDS) Dissolved SOLIDS, (TSS) Suspended SOLIDS, (SS) Settleable OIL & GREASE, Aqueous	406 mg/l 8 mg/l <.5 ml/l <.2 mg/l

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Warner R. Woolfenden".

Warner R. Woolfenden, Ph.D.
Technical Director

Castle Gate Pop Plant



*** INVOICE ***
=====

CLIENT: Oil, Gas, & Mining
3 Triad Center
Salt Lake City, UT 84180-1203

INVOICE NO: : 838
Date Samples Rec'd: 03/03/89

ATTN: *Harold Sandbeck*
~~Darwin Haddock~~
Project:

P.O. 582938

LAB SAMPLE NO	SAMP DATE	SAMPLE DESCRIPTION	ANALYSES PERFORMED	RUSH CRG%	FEE
7194	03/02/89	900 PRICE RIVER BY FIRE STAT	SOLIDS, (TDS) Dissolved	0	9.60
			SOLIDS, (TSS) Suspended	0	8.80
			SOLIDS, (SS) Settleable	0	8.00
			OIL & GREASE, Aqueous	0	20.00

WJW
Reviewed and Approved:

Invoice Date: 03/08/89

Total Due: \$ 46.40