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Coastal States Energy Company

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DIVISION OF
OIL, GAS & MINING

July 1, 1987

Mr. Harold Thompson
U.S. Environmental Protection Agency
Water Management Division (8WM-C)
1 Denver Place, Suite 500
999 - 18th Street
Denver, Colorado 80202-2413

Dear Mr. Thompson:

In accordance with the conditions of NPDES Discharge Permit UT-0023540, Part II - A-2 and Utah Mining Code Section 817.52(b)(i)(ii), Utah Fuel Company is herewith providing the required written notification of a failure to comply with the daily maximum effluent limitation for oil and grease at the 001 discharge point.

The problem occurred in a routine sample taken at 9:40 a.m. on 6/5/87. The oil and grease concentration at this time was observed at 14.6 mg/l. (The maximum limitation is 10 mg/l.) The period of non-compliance is not known, but occurred sometime after the routine sample taken on 5/21/87. A previous failure to comply was reported for a sample taken on 3/18/87.

An investigation, ongoing since the March occurrence, has resulted in a tentative identification of the problem as leaks from the longwall hydraulic system. This system utilizes a soluble emulsifying oil, identified as Solcenic 3A, manufactured by Century Hulburt of Kansas City, Kansas. The oil is diluted to a ratio of 5% oil to 95% water. The solubility of this oil would account for the failure of the skimmers to remove the oil.

To reduce the potential for a re-occurrence, the following steps are being taken:

1. Inspection of the longwall system is being accomplished on each production shift.
2. Supervisors and operators of the system have been instructed in better maintenance procedures.
3. Management follows the success of the operation at weekly staff meetings.

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4. Procedures to contain and recycle escaping emulsion fluid have been implemented.
5. Samples of the discharge are being monitored at least weekly for oil and grease by an independent on-site laboratory, and
6. Efforts are being pursued to identify a practical emulsion breaker which will either precipitate or float the oil.

Any suggestions which you or members of your staff may have in helping us to further reduce this problem will be appreciated.

Sincerely,

Keith W. Welch

Keith W. Welch
Environmental Coordinator

KWW/ak

xc: Division of Oil, Gas and Mining
Division of Environmental Health
Glen A. Zumwalt