



State of Utah

DEPARTMENT OF HEALTH
DIVISION OF ENVIRONMENTAL HEALTH

Norman H. Bangerter
Governor
Suzanne Dandoy, M.D., M.P.H.
Executive Director
Kenneth L. Alkema
Director

288 North 1460 West
P.O. Box 16690
Salt Lake City, Utah 84116-0690
(801) 538-6121

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AUG 12 1991

DIVISION OF
OIL GAS & MINING

Keith Welch
Coastal States Energy Co.
175 East 400 South, Suite 800
Salt Lake City, UT 84111

RE: NPDES Discharge Permit UT-0023540;
The Frequent Exceeding of the TDS
Effluent Limitation

Dear Keith Welch:

Coastal States has developed a pattern of regularly exceeding the permitted effluent limitation for TDS. When the permit was renewed in September 1990, the TDS effluent limitation was increased from 700 mg/L to 1000 mg/L on the condition that the average of TDS shall not exceed 723 mg/L for the year. The average maximum monthly value for TDS at Coastal States from August 1988 to July 1989 was 766 mg/L; for August 1989 to July 1990 it was 832 mg/L. From August 1990 to the present the average value for TDS is 1052 mg/L. The last five reported values for TDS have exceeded the 1000 mg/L limit. The latest reported value for TDS is also the highest value, 1431 mg/L. This demonstrates a definite upward trend. Since the permit renewal there has also been 4 reported analysis of sulfate exceeding the sulfate effluent limit in the new permit. We recognize that the sulfate problem is related to the TDS problem. Another problem is reported oil and grease analysis which have exceeded the effluent limitations significantly two times since the permit renewal.

Do you know what the problem is, or do you have an explanation for these results? What do you plan to do to come into compliance with your permit?

Sincerely,

Donald A. Hilden, Ph.D., Manager
Permitting & Compliance Section
Bureau of Water Pollution Control

DAH:hc

cc: Salt Lake City/County Health Dept.
Region VIII EPA

S:NPDES
FILE:COASTS.LTR

[Handwritten notes and signatures at the bottom of the page]