



# State of Utah

# FILE COPY

DEPARTMENT OF ENVIRONMENTAL QUALITY  
DIVISION OF WATER QUALITY

Norman H. Bangert  
Governor  
Kenneth L. Alkema  
Executive Director  
Don A. Ostler, P.E.  
Director

288 North 1460 West  
Salt Lake City, Utah  
(801) 538-6146  
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Reply to: State of Utah  
Division of Water Quality  
Department of Environmental Quality  
Salt Lake City, Utah 84114-4870

0002

January 17, 1992

*4/2/92*  
*orig mine file*  
*Skylar Miner*  
*ce L. Broughton*  
*DRW*  
*P. Burton*  
*R. Summers*  
*D. Haddock*

Mr. Keith Welch, Env. Coordinator  
Coastal States Energy Company  
175 E. 400 S. Suite 800  
Salt Lake City, UT 84111

RE: Chronic Exceedance of the TDS Limit  
Permit No. UT0023540

Dear Mr. Welch:

Coastal States has established a pattern of significant noncompliance through chronic exceedance of the total dissolved solids (TDS) permit limit. We have your assessment of the problem from the meeting we had with you on May 31st, 1991, and from a letter summarizing your findings and your plans for mitigation dated June 27th, 1991. We would like to have detailed plans as to how you propose to mitigate the high TDS problem if those plans have changed since our last meeting. As you have informed us in the past we can not judge the progress in mitigating the high TDS by the TDS concentration reported on the DMR forms. Do you see any progress in your mitigation efforts? Do you see any end to the high TDS problem? If it is not possible to come into compliance within a reasonable amount of time can you give us a reason to justify increasing the TDS limit? We would appreciate a response within thirty (30) days.

Sincerely,

Don A. Ostler, P.E.  
Director

*HC*  
*DAO:hc/st*  
*DAO*

cc: David Ariotti, Southeast District Engineer  
Claron D. Bjork, Environmental Health Dir., Southeastern Utah District Health Dept.  
Michael Reed, EPA Region VIII, Water Management Division (8WM-C)

S:COASTALUTR  
FILE:UPDES



**Coastal**  
The Energy People

February 21, 1992



Mr. Don A. Ostler  
State of Utah  
Division of Water Quality  
Department of Environmental Quality  
Salt Lake City, Utah 84114-4870

RE: Chronic Exceedance of the TDS Limit  
Permit No. UT0023540

Dear Mr. <sup>Don</sup> Ostler:

In response to your request of January 17, 1992, we are herewith submitting an update of our progress in reducing the TDS concentration from our 001 discharge point.

Correspondence dated June 27, 1991, summarized the nature of the TDS problem, and recommended a solution. Our approach to solving this problem has not changed. In the mean time, we have continued searching for alternate solutions, and have sought professional assistance in documenting the extent of the problem, and in estimating the time required to bring the TDS concentration back within permitted limits. We have had ECOSYSTEM RESEARCH INSTITUTE, of Logan, Utah, conduct studies on the dissolution rate of the gypsum rockdust, and also evaluate the impact of the rockdust on the aquatic community in Eccles Creek. A copy of their report is attached.

As you can see, the conclusions of their study confirm our opinion that the problem can be solved by eliminating additional contamination, and by allowing the system time to flush. We recognize some uncertainty in the time frame required for the system to flush, since we can only approximate the amount of gypsum rockdust that potentially could be contacted by the stored water. Evidence in recent months, indicates that the TDS concentration is dropping, however, we are unsure as to whether this represents a long term trend, or the fact that water level in the underground sump may be cycling at some lower level, and could still re-entrain additional rockdust at higher sump levels.

**Utah Fuel Company**

A SUBSIDIARY OF THE COASTAL CORPORATION  
P. O. BOX 719 • HELPER UT 84528 • 801/837-7826 • FAX 801/837-7829  
SALT LAKE 801/598-7111

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Chronic Exceedance of the TDS Limit  
Permit No. UT0023540

We still feel that we are pursuing the most logical solution, but in the meantime, request your continued forbearance.

Sincerely yours,



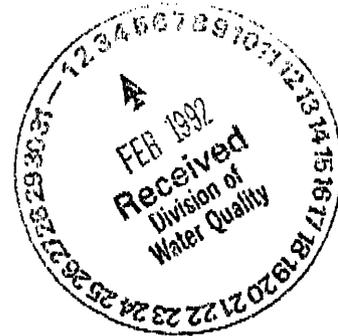
Keith W. Welch  
Environmental Coordinator

KW:gb

Attachment



**Coastal**  
The Energy People



*Fred*

January 30, 1992

Mr. Don Ostler, Bureau Director  
State of Utah  
Division of Water Quality  
Department of Environmental Quality  
Salt Lake City, Utah 84114-4870

RE: NPDES PERMIT UT-0023540

Dear Mr. Ostler:

In accordance with the conditions of NPDES Discharge Permit UT-0023540, Part II - I-3 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 maximum effluent limitations for TDS at the 001 discharge point.

The problem occurred with the sample taken December 11, 1991, which had a TDS concentration of 1400 mg/l. This concentration exceeds the 1000 mg/l maximum limitation for TDS established in the current NPDES discharge permit. The laboratory report received on December 26, 1991, erroneously reported the TDS concentration within limits. The subsequent corrected report showed the exceedence as noted.

Sincerely,

*Keith W. Welch*

Keith W. Welch  
Environmental Coordinator

KWW/ak/2400

*Limit = 1000 mg/l  
TRC = 1.4  
∴ 1400 ≈ SNC*

xc: Division of Oil, Gas & Mining  
Glen A. Zumwalt  
Keith Zobell

Michael Reed, EPA  
Ken May