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DIVISION OF
OIL GAS & MINING

0055

June 10, 1992

Mr. Lowell Braxton
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Dear ^{Jewell} Mr. Braxton:

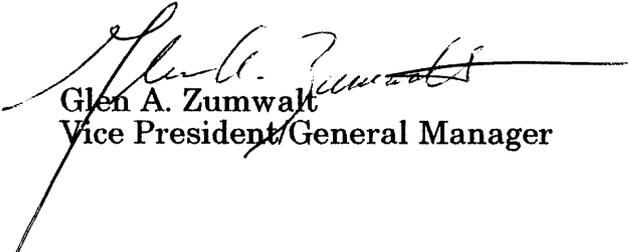
RE: EXTENSION OF ABATEMENT DATE FOR NOV 92-37-3-1

It is hereby requested that an extension be granted for the abatement date proposed by the Division for the referenced NOV. This extension is required to allow the Division of Water Quality sufficient time to review the plan submitted to them in accordance with Administrative Order I92-03 and for Utah Fuel Company to complete engineering design of the approved remediation system.

A copy of the DWQ requested abatement plan is attached. Please recognize that this plan is currently undergoing DWQ review, and is subject to change.

In the meantime, we request your forbearance until this matter can be resolved.

Sincerely,


Glen A. Zumwalt
Vice President/General Manager

Keith Welch:gb

Attachment

cc: Keith Welch
Keith Zobell
Ken May

Utah Fuel Company

A SUBSIDIARY OF THE COASTAL CORPORATION
P. O. BOX 719 • HELPER UT 84526 • 801/637-7925 • FAX 801/637-7929
SALT LAKE 801/596-7111



Coastal
The Energy People

June 2, 1992

Mr. Don Ostler, Director
Division of Water Quality
Department of Environmental Quality
P. O. Box 144870
Salt Lake City, Utah 84114-4870

Dear Mr. Ostler:

RE: Administrative Order I92-03

Submitted herewith is a detailed plan on how Utah Fuel Company will achieve compliance with their UPDES permit. This plan is submitted, as required, by item 2 of the referenced administrative order.

As stated in correspondence dated, February 21, 1992, the preferred, and most cost effective, option is to let the gypsum based rock dust be removed from underground by a dissolution process. This option is guaranteed eventual success because only a finite amount of this material was placed into the system and will eventually be removed. We have evidence that this system is working, as shown by a decrease in the TDS concentration of approximately 30% since the peak of about nine months ago. This dissolution process will continue regardless of other options which may be implemented. However, we are still unable to identify a date at which dissolution alone will bring us into compliance.

In the meantime, we have been investigating several other options, some of which show promise and others which have been discarded as impractical. One such method, reverse osmosis, has been abandoned as being too costly but, more importantly, because the large volume of highly saline process waste would introduce a very difficult disposal problem.

Another option, ion exchange, has been extensively investigated and, at first, showed favorable results. Attempts, however, to increase the TDS removal efficiency and to also eliminate the undesirable effects of polymer addition ultimately resulted in a very marginal TDS reduction. This factor, compounded with problems of cost, equipment cost and operational complexity, ended in a decision to abandon the ion exchange option.

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Page 2
Mr. Don Ostler
June 2, 1992

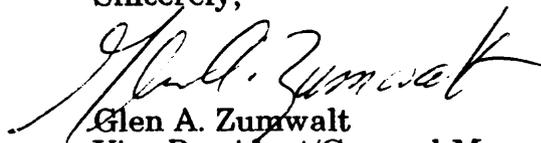
The only remaining viable option, of which we are aware, is a membrane process which incorporates electro dialysis. We are instructing our consultant, PRS Recycling Services, to proceed with engineering design of this equipment. The basic components for such a system are readily available but require selection of membranes which are very site specific. A concurrent evaluation will be made of electrical power, plumbing and other equipment requirements. It will also be necessary to ensure that this entire system complies with MSHA regulations. With the development of an acceptable plan, and Division approval, Utah Fuel Company will initiate purchase and installation of this equipment by October 1, 1992. Delivery is estimated at sixty days.

This process should result in almost immediate compliance with the 1000 mg/L TDS and the 500 mg/L sulfate limitations. The ability to meet the 723 ml/L yearly average for TDS is less certain. It is, therefore, requested that an exemption to the yearly average be granted until the effectiveness of this proposed plan can be evaluated. It is suggested that a six month trial period would be appropriate. At this point, if necessary, a method for compliance with the 723 mg/L yearly average will be presented to the Division for approval.

The requirements in the Administrative Order to study the impacts on Eccles Creek was essentially completed last year in a study contracted with Ecosystem Research Institute of Logan, Utah. A copy of that report was previously submitted in correspondence dated, February 21, 1992. In discussing this requirement with member of your staff, it was decided that a biomonitoring test for chronic toxicity would be useful. We will conduct this test upon your approval to do so.

We appreciate your forbearance while we have attempted to deal with this problem, and for the assistance offered by members of your staff.

Sincerely,



Glen A. Zumwalt
Vice President/General Manager

Keith Welch:gb

cc: ✓ Keith Welch
Keith Zobell
Ken May