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LPB/ John W, Mrs fib

**KAISER
COAL**

KAISER COAL CORPORATION
Sunnyside Coal Mines
P.O. Box D
Sunnyside, Utah 84539
Telephone (801) 888-4421

RECEIVED
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DIVISION OF
OIL, GAS & MINING

April 23, 1986

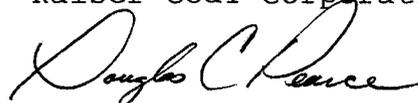
Mr. Lowell P. Braxton
Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

RE: Remedial action for NOV N86-4-5-1
Sunnyside Mines, ACT/007/007
Carbon County, Utah

Dear Mr. Braxton

On April 4, 1986 we received the above mentioned violation for excess oil and grease discharge at the Manshaft and Whitmore Canyon mine water ponds. Remedial actions for this problem are currently under discussion with EPA and the State Board of Health. Attached is the latest letter which reflects our current actions to abate the problem. The remedial action required by the violation requires that NPDES permit requirements be met by using flocculents as needed. As pointed out in the attached letter the use of flocculents will not help to meet permit requirements when used on the surface at the ponds. We are requesting that the Division accept the underground and surface inspection plan presented to the EPA as the required remedial action to meet NPDES permit requirements.

Sincerely,
Kaiser Coal Corporation



Douglas C Pearce
Mine Engineer

John: Pearce

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LPB 7-26

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April 22, 1986

EPA
Suite 103, 1860 Lincoln Street
Denver, Colorado 80295
Attn.: Water Management Division Compliance Branch

RE: NPDES Permit Number UT0022942
Discharge Number 001A
Change in proposed remedial
action for non-compliance

Dear Sirs:

In our letter of January 13, 1986 we proposed to use a Exxon Chemical product, JayFloc 839 Liquid Cationic Polyelectrolyte to treat hydraulic emulsion fluid in the mine water discharge. The original tests conducted by Exxon Chemicals were on a 5% oil water solution which is the concentration that is piped into the mine. Results from that test showed that a clean separation of oil and water was possible using low concentrations of polyelectrolyte.

Additional testing conducted by Exxon Chemicals on samples containing 20 mg/l of emulsion oil showed that separation of oil and water was possible using 500 ppm of polyelectrolyte. Problems noted in the test are that the separation of oil and water was not sharp. The oil formed small masses resembling cotton which are slightly denser than the water. After a 24 hour period the oil had sunk to the bottom the the test jars in a loose layer. Oil in this form could be moved around or held in suspension by small currents in the pond would not be trapped by a oil skimmer.

Additional water and oil samples have been sent to the main Exxon Chemicals laboratory in Houston, Texas for testing with other products. If a product can be found which will promote the clean separation the oil and water and also allow the the oil to float, the product will then be installed for use in the mine water ponds when visible concentrations of the emulsion

EPA
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oil are present in the discharge water or when monitoring results show non-compliance.

Currently the actions taken at the mine to identify and repair problems with the emulsion oil distribution system are to inspect the distribution pipe line underground on a daily basis when pre-shift mine examinations are made. If problems are found such as a leak, mine personnel have been instructed in writing on April 7 and 14th to report the problem and then repair it immediately. The JayFloc 839 now at the mine will be used underground at individual spill sites if they occur to treat the emulsion oil before it is diluted by mixing with other mine water. As a backup to the in-mine inspection program, visual examinations of mine water discharges are made every few days for milky or cloudy water which would indicate the presence of emulsion oil in the water. Since the start of this program there have not be reported problems underground or on the surface.

Sincerely,
Kaiser Coal Corporation



Douglas C Pearce
Mine Engineer

cc. Utah State Board of Health
Utah Division of Oil, Gas and Mining