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Reply to: State of Utah
Division of Water Quality
Department of Environmental Quality
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MEMORANDUM

TO: Sunnyside Coal Company UPDES File
UT0022942

FROM: Mike Herkimer, Environmental Health Scientist
Permitting and Compliance Section *Mike Herkimer*

DATE: October 30, 1991

SUBJECT: Visit to Sunnyside Coal Company to investigate discharge of coal fines from discharge 002B. August 1991 DMR showed a value of 38 mg/L for monthly average of total suspended solids.

On October 10, 1991 I visited Sunnyside Coal Company with Harry Campbell and Dave Ariotti. Also in attendance was Miles Moretti of the Division of Wildlife Resources in Price and Gary Gray a representative of Sunnyside Mine. Our purpose in the visit was to investigate a loss of coal fines to Grassy Trail Creek which caused a TSS violation of the permit at discharge 002B and to try to determine the extent of any damage which may have occurred to Grassy Trail Creek. We also desired to prevent future permit violations of TSS. *more than look... by far*

Discharge point 002B had indeed coated the discharge pipe, associated transport channel and portions of Grassy Trail Creek below its confluence with the transport channel. Why the pond (002B) has acted up now after having operated properly for so long is not known. These concepts are known as fact:

1. The company exceed their monthly and weekly average TSS limitation at 002B for August and September of 1991.
2. Grassy Trail Creek was definitely impacted.
3. The in mine water going to 002B filters through a large gob area as well as through an active longwall mining site.
4. The company uses Solcenic 3B as a longwall mining fluid.

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5. Also in the present active longwall mining area, there are natural seeps of petroleum based material.

One theory for the excessive suspended particles is that the coal fines became coated with a natural petroleum product which in the mining process becomes mixed with Solcenic 3B (which contains an oil emulsifier), thus suspending the coal fines throughout the water and preventing settling or floating (which is the normal removal process in the 002B pond).

In a meeting with Gary Gray and Joe Fielder, the Mine Manager, a number of preventive methods were discussed. It was agreed to by all present that instead of trying to determine the cause, the best method was to prevent solids from reaching the stream. Several in-mine changes were presented by Mr. Gray and Mr. Fielder. It was agreed to allow Sunnyside to try in-mine changes first before some type of surface wastewater treatment would be required. Sunnyside was to draft a letter within the next thirty days (from October 10th) to the Division of Water Quality, Division of Wildlife Resources and Division of Oil, Gas and Mining indicating what in-mine changes have been proposed and when these changes will be implemented. I indicated to Mr. Fielder that the Division of Water Quality may take an enforcement action if the TSS violations continue and/or the Division of Wildlife Resources feels the stream has been impaired and requests such an action, no matter what stage Sunnyside Coal Company was at in trying to prevent the problem. Mr Gray and Mr. Fielder indicated that they understood our position.

No mention was made by Miles Moretti regarding the present condition of Grassy Trail Creek. He said that DWR's position was indicated in the letter dated October 2, 1991 to Karl Housekeeper from Timothy Provan. DWR will be monitoring the stream and will contact us if they feel it necessary.

MDH:st

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FILE:UPDES