



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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August 8, 1994

To: Lowell Braxton

From: Randy Harden

RE: Site Evaluation, Sunnyside Coal Company, Sunnyside Mines, ACT/007/007, Folder #2, Carbon County, Utah

A site visit was conducted to the Sunnyside Mine site on July 27, 1994. Present on site during the evaluation were myself, Pete Hess, and Jim Semborski. The primary purpose of the site visit was to evaluate the extent and the condition of PCB containing equipment as well as oil storage facilities and oil-contaminated areas.

A manifest of the transformers showing the amount and PCB level for all known transformers within the property was located at the mine site office. This manifest is maintained on site as part of the EPA requirements for toxic and hazardous materials.

Based on the information found on the site, six transformers remain on the property which contain elevated levels of PCB's. All six of these transformers were in service and on-line at the time mining operations ceased. All six transformers are still in serviceable condition. Levels of PCB's found in these transformers and the location and the description of these transformers is found on attached sheets to this memo.

Although these transformers contain PCB's, the contamination levels of the oils within these transformers is such that they were allowed to remain in service. In accordance with EPA requirements, these transformers, when taken out of service, would have to have the oil drained and disposed of in accordance with EPA specifications. A letter indicating the cost for replacement of the oil within these transformers is attached. That bid amount was for the replacement of the oil in the transformers such that the transformers could be salvaged and sold and totaled \$15,633 for all six transformers.

Other oil storage facilities were found to have primarily lubricating and machinery type oils. Some barrels indicated that they did contain transformer oil and one of the barrels was found to have a transformer sunk into the barrel. Some of the oil may contain PCB's but the likelihood of having significant amounts of PCB's left on the site for cleanup seems unlikely.



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ACT/007/007
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Oil storage barrels which could not be identified by Sunnyside Coal were sampled by JBR Consultants. Disposal of the barrels is also under contract by JBR. Additional testing of other oil-contaminated areas including soils is anticipated by Jim Semborski following disposal of the barrels. Such additional costs for testing and disposal will be subject to approval by the bankruptcy court. As of August 8, 1994, sample results from the initial testing have not been received by Sunnyside. Follow up directly with JBR Consultant's (801-943-4144) has not yielded any definitive results on the testing work to date.

Regardless of the final testing and analysis, it is not anticipated that the costs for PCB disposal and other oil-contaminated materials on the site will be exorbitant. A realistic cost for disposal of oil-contaminated areas and PCB's could be estimated to range from \$30,000-\$100,000 including approximately 2,200 gallons of transformer oil known to contain PCB's.

Other activities on the site related to reclamation include the sealing of three of the 9' diameter shafts and anticipation of closure of the remaining shafts and portals on the site. However, since the site visit, all of Sunnyside's employees including secretarial staff and surface crews have been laid off, except for Daryl Leonard (801-888-4421), who remains on site. Additionally, no set contracts or bids had been awarded for the demolition, salvage or removal of any of the mine structures or facilities at the time of the inspection. Based on this situation, it can be expected that little or no further reclamation activities will occur on the site until such time as the reorganization plan is heard in bankruptcy court.

cc: J. Carter
D. Haddock
T. Mitchell/B. Richards

Sunnyside Coal Company

Operations • Highway 123 • P.O. Box 99 • Sunnyside, Utah 84539

November 23, 1993

Mr. Rodney Maggard, Sales Technician
Mr. Bill Hall, Sales Technician
S. D. Myers
"The Transformer Consultants"
40523 Encyclopedia Circle
Fremont, California 94538

*#15,633 for
all transformers*

Dear Rod and Bill:

As we discussed over the telephone, I am forwarding photos and information on six in-service, PCB-contaminated transformers at Sunnyside Coal Company.

Two transformers are located at the Tipple Substation. Both can be de-energized for servicing. Information on these is as follows:

<u>Serial #</u>	<u>Manufacturer</u>	<u>Capacity</u>	<u>PCB Level</u>	<u>Gallons PCB</u>
C-863030	GE	1000 KVA	116 ppm	490
17910	Weaver	-167 KVA	124 ppm	750

*#1,833
Feb 15*

Three transformers are located at the Whitmore Substation. These power the Whitmore Mine Fan and should not be de-energized to service, if at all possible. Pertinent information is as follows:

<u>Serial #</u>	<u>Manufacturer</u>	<u>Capacity</u>	<u>PCB Level</u>	<u>Gallons PCB</u>
8114186	GE	48 KVA	164 ppm	61
8114187	GE	48 KVA	261 ppm	61
8114188	GE	48 KVA	181 ppm	61

*about 1400
Total*

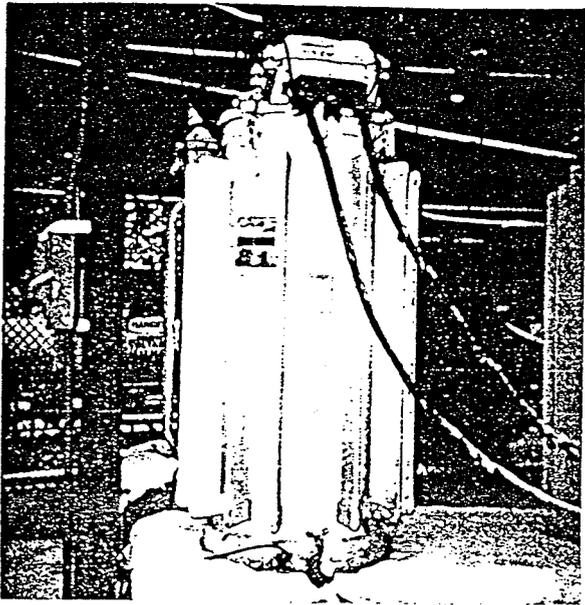
Transformer #6 is located at our Outcrop Substation. It powers the #1 Mine Hoist and can be pulled off line, if necessary. Pertinent information is as follows:

<u>Serial #</u>	<u>Manufacturer</u>	<u>Capacity</u>	<u>PCB Level</u>	<u>Gallons PCB</u>
3164261	Westinghouse	1000 KVA	165 ppm	770

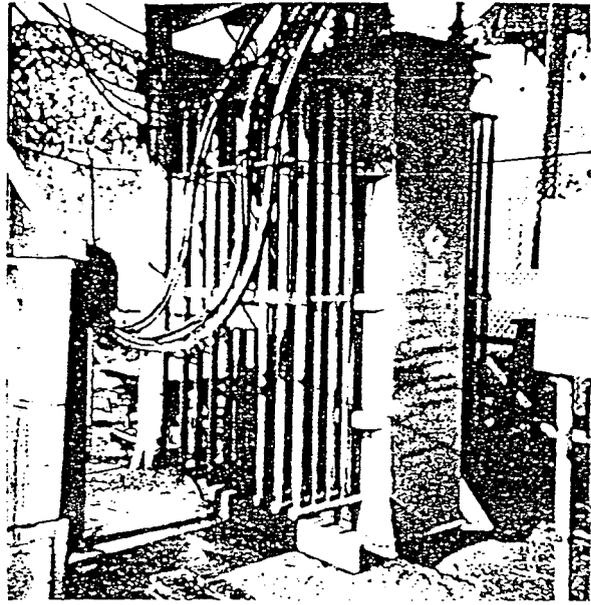
Corporate Offices
The Registry
1113 Spruce Street
Boulder, CO 80302
~~303-938-1506~~
FAX: 303-938-5050

Operations
Highway 123
P.O. Box 99
Sunnyside, UT 84539
801-888-4421
FAX: 801-888-2581

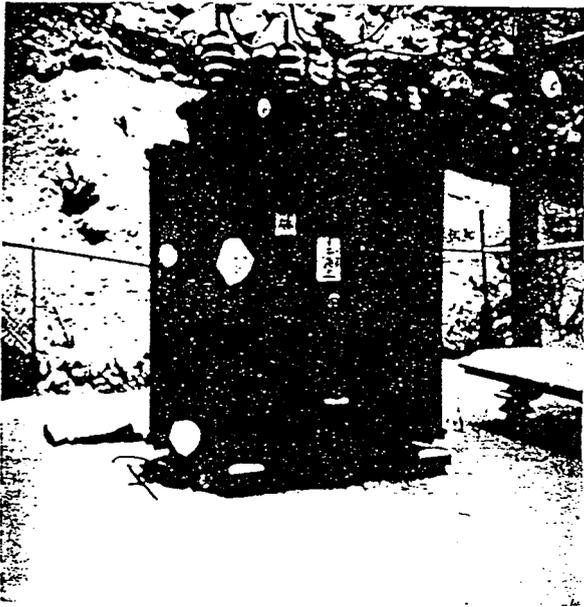
*21,200
Gallons*



Tipple Substation
750 Gallons - 167 KVA
GE Ser. # 17910 124 ppm



GE # C-863030
Tipple Substation
490 Gallons 1000 KVA



Outcrop Substation
Westinghouse 165 1000 KVh
ppm
Ser. # 3164261 - 770 Gallon



Whitmore Substation
3 Transformers GE { 8114186-169 ppm
#s { 8114187-261 ppm
8114188-181 ppm