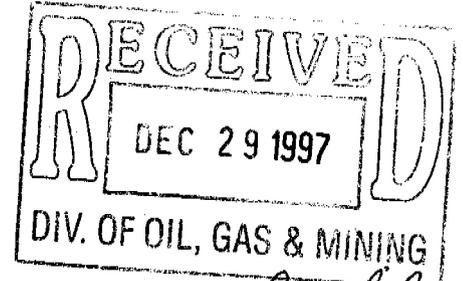


December 19, 1997

Paul Baker
Utah Division of Oil, Gas and Mining
Coal Regulatory Program
1594 West North Temple, Suite 1210
Box 145801
Salt Lake City, Utah 84114-5801



Re: Cessation Order No. C97-41-2-1, Wellington Preparation Plant, ACT/007/012

CO file
#B

Dear Mr. Baker:

The abatement for the above referenced Cessation Order (CO) required the following:

- 1) A water sample from the pumphouse sump to be tested for oil/grease
- 2) A sample of sediment from the pumphouse sump to be tested for PCBs
- 3) A sample of material from the pumphouse floor to be tested for PCBs

The water sample was taken on December 10 and the result of the analysis was received on December 12. This result indicated that the concentration of oil/grease in the pumphouse water was below the detection limit. The laboratory sheet was sent to you on December 12 and an additional copy is attached hereto.

The other two samples were taken on December 2. Results were received from the laboratory on December 17. PCBs were not detected in the sample of the pumphouse sump sediment. However, the sample from the floor of the pumphouse did show a PCB-1260 concentration of 8mg/kg. As you know this concentration is below the level (50 mg/kg) to require clean-up. Covol, in an effort to demonstrate good faith and resolve this CO, proposes to perform a PCB clean-up of the floor of the pumphouse. The material resulting from this clean-up will not be considered hazardous because of the low concentration of PCBs so the disposal will be in an approved industrial land fill.

If there are any questions please contact me at (435) 688-0572. Thank you for working with us on this abatement.

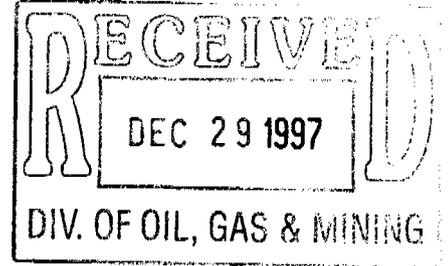
Very truly yours,

A handwritten signature in cursive script, appearing to read "Barry Barnum".

Barry Barnum

Inter-Mountain Labs, Inc.

Facsimile Cover Sheet



To: Barry
Company: JBR Environmental
Phone:
Fax: 435-688-0572

From: Suzanne McFetridge
Company: IML- Bozeman
Phone: 1-800-828-1413
Fax: 1-406-586-8343

Date: 12/16/97

**Pages including this
cover page:** 1

Comments: PCB results for

Sample Id:	Result	PQL
Well Discharge Sed.	ND	Below
Pumphouse Pump Level	8mg/kg (1260)	Below

ND = Not Detected at stated PQL

Aroclor Compounds

	PQL (mg/kg)
1016	1
1221	2
1232	1
1242	1
1248	1
1254	1
1260	1
1268	1

Barry Please call me regarding 9852 and the result which shows positive.

COMMERCIAL TESTING & ENGINEERING CO.

GENERAL OFFICES: 1919 SOUTH HIGHLAND AVE., SUITE 210-B, LOMBARD, ILLINOIS 60148 • TEL: 630-953-9300 FAX: 630-953-9306

SINCE 1908



Member of the SGS Group (Société Générale de Surveillance)

PLEASE ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1020
HUNTINGTON, UT 84528
TEL: (801) 653-2311
FAX: (801) 653-2436

December 11, 1997

COVOL TECHNOLOGIES, INC.
3280 North Frontage Road
Lehi, Ut. 84043
Steve PitcherSample identification by
Covol

ID: PUMPHOUSE SUMP

Rec'd 0915 hr.
Sampled 0850 hr.

Kind of sample reported to us Water

Sample taken at Covol

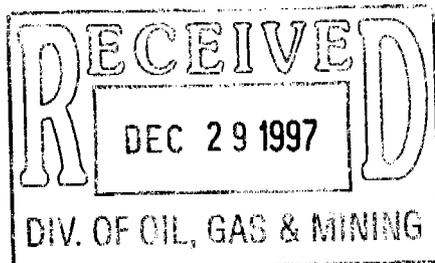
Sample taken by Covol

Date sampled December 10, 1997

Date received December 10, 1997

Analysis report no. 59-18154

Parameter	Result	MRL	Units	Method	Analyzed	
					Date/Time	Analyst
Oil & Grease	<2	2	mg/l	SM5520-B	12-11-1997 0700	JC

Respectfully submitted,
COMMERCIAL TESTING & ENGINEERING CO.*Larry Stout*
RS

Huntington Laboratory

