



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

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June 22, 1993

Mr. David Pearce
Sunnyside Cogeneration Associates
P.O. Box 58087
Salt Lake City, Utah 84158-0087

Dear Mr. Pearce:

Re: Stipulation #6 Response, Sunnyside Cogeneration Associates, Refuse and Slurry, ACT/007/035, Folder #2, Carbon County, Utah

The response to Stipulation #6 cannot be approved. The operator's report on tolerable limits of iron and TDS in water for plants and animals was very general. The report discussed several studies of tolerable limits and exceeded levels of iron and TDS, but failed to cite the source of information. Sustained levels of TDS, as found at the seep, also were not discussed as to tolerable limits for macroinvertebrates or fish. The entire report fails to specifically address the particular conditions and data which exist at the Coarse Refuse Seep. The report also fails to address perhaps the more important consideration that by finding some metals in the solution may and probably does indicate that other more detrimental metals are present.

The Discussion on Tolerable Limits of Iron and TDS in water for Plants, Livestock, Wildlife, and Fish must be expanded prior to approval for inclusion in the permit. References must be provided for the literature cited. A discussion must be included which specifically addresses the particular conditions and data which exist at the coarse Refuse Seep. Please submit this information by July 16, 1993.

If you have any questions, please call me.

Sincerely,

Pamela Grubaugh-Littig
Permit Supervisor

cc: H. Klein
S. White
STIP6COG.LET

