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

Michael O. Leavitt
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April 12, 1993

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

Dear Mr. Pearce:

Re: Permit Stipulation #17, Sunnyside Cogeneration Associates, Coarse Refuse at the Sunnyside Mine, ACT/007/035, Folder #2, Carbon County, Utah

The response to Stipulation #17 has been submitted and reviewed by the technical staff. Acidity must be included on the analysis, see attached memo from Ken Wyatt. Additionally, page 3 must be reworded to differentiate the potential impacts from the SCA operation on these two water resources.

Please submit your responses to finalize this stipulation by May 14, 1993. If you have any questions, please call me.

Sincerely,

A handwritten signature in cursive script, reading "Pamela Grubaugh-Littig".

Pamela Grubaugh-Littig
Permit Supervisor

pgl
Enclosure
cc: Ken Wyatt





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April 9, 1993

TO: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Ken Wyatt, Senior Reclamation Hydrologist *KW*

RE: Permit Stipulation #17 Review, Sunnyside Cogeneration Associates, Sunnyside Refuse Pile, ACT/007/035, Folder #2, Carbon County, Utah

SYNOPSIS

Sunnyside Cogeneration Associates submitted a response to permit stipulations numbers 6, 17, and 18 on March 5, 1993. This memo will review the response for stipulation 17.

ANALYSIS

Stipulation 17 required the operator to: "Within 30 days of permit approval, the permittee must submit a schedule for each of the water monitoring sites to be sampled with a list of the parameters to be analyzed at each site and the schedule for sampling as baseline and operational parameters."

The operators response was to re-submit plates 7-2 and 7-3. Plate 7-3 shows general locations of permitted mine discharge locations. The UPDES permit #UT0024759 includes six mine discharge points as listed below:

<u>POINT</u>	<u>LOCATION</u>	<u>LATITUDE</u>	<u>LONGITUDE</u>
004	Clear Water Pond	39° 32' 52"	110° 23' 11"
007	Rail Cut Pond	39° 32' 14"	110° 23' 48"
008	Old Coarse Refuse Pond	39° 32' 20"	110° 23' 3"
009	Pasture Pond	39° 32' 36"	110° 23' 29"
012	Coarse refuse Toe	39° 32' 28"	110° 23' 58"
013	Facility Sediment Pond ¹	39° 32' 46"	110° 23' 49"
014	Coal Pile Sediment Pond ¹	39° 32' 45"	110° 23' 26"
015	Landfill Sediment Pond ¹	39° 32' 20"	110° 23' 38"
016	Borrow Area Pond	39° 32' 45"	110° 23' 45"

1: Indicates points are included in the power plant facility and are regulated by DOGM.



Page 2
Technical Deficiencies
PRO/007/035
April 9, 1993

The above sampling locations are operational sampling points. Plate 7-2 as re-submitted shows general locations of baseline water monitoring points. The baseline water monitoring sampling location are shown on Plate 7-2. Stipulation #17 required schedules for monitoring and a parameters list be submitted for each monitoring location.

The March 5 submittal provides both a schedule for sampling and a parameter list. Comparing the parameters submitted with those found in the guidelines revealed that all of the parameters in the guidelines were presented in the parameter list with the exception of acidity. Additionally, the parameter list submitted does not reflect the collection of both dissolved and total species for major, minor and trace elements. This will need to be corrected. Monitoring frequency is described in the MRP which commits to monitoring field parameters twice per month and collecting quality samples on a quarterly basis. This is described in the submitted tables.

The operator states on page 3: " Both of these sites occur downstream from the SCA Permit Area and should provide indication as to whether the activities within the Permit Site are impacting the water resources in the area. The East Carbon City Well is located on the opposite side of Grassy Trail Creek. It is unlikely that this monitoring location will determine specific impacts from the SCA operation. The Icelander Columbia Dugway Spring 1350 is closer to the Permit Area and could possibly show downstream impacts. The statement above should be re-worded to differentiate the potential impacts from the SCA operation on these two water resources.

RECOMMENDATION

Stipulation 19 required Plates 7-2 and 7-3 to be re-submitted by July 1, 1993 to reflect specific locations and elevations of water monitoring stations. These are still outstanding and will be submitted in response to Stipulation 19.

The statement from page 3 above should be re-worded to differentiate the potential impacts from the SCA operation on these two water resources.

The water quality monitoring program as described in this submittal is within the current guidelines established by the Division and as described in the MRP. **The operator did not include Acidity in the analyses. The operator should commit to performing both Total and Dissolved analyses for major, minor and trace elements as described in the guidelines and include acidity before the response to this stipulation is adequate.**