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

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August 10, 1994

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

Re: Slurry Sampling Plan, Sunnyside Cogeneration Associates, Sunnyside Refuse and Slurry, ACT/007/035, Folder #2, Carbon County, Utah

Dear Mr. Pearce:

The Division received on May 23, 1994, a response to an initial review of the refuse and slurry sampling plan. The response reads as follows:

"Based on a conference call on May 17, 1994 between Henry Sauer of DOGM, Bruce Eloff of EWP Engineering, and Frank Polniak of ACZ Laboratories, Henry Sauer agreed that samples collected from the precipitate layer will be analyzed using ICP analysis with a saturated paste extraction, and furnace atomic adsorption analysis is not necessary."

It appears that while the account of the conversation is accurate, portions of the agreements made during the conference call have been omitted. These agreements included:

- 1) Prepare standard solutions of known metal concentration and matrix characteristics similar to sample. Determine recovery with and without matrix components. If necessary pretreat sample to decrease interference (i.e.: matrix interference by chlorides and sulfates may be inhibited by pretreatment with silver chloride and barium nitrate, respectively).
- 2) Ensure calibration curve is linear over the concentration range of interest.
- 3) Correction may be applied for interference if the interfering element and the magnitude of the interferences are determined.
- 4) Split samples, duplicate analysis.
- 5) Split samples with DOGM.



Page 2
ACT/007/035
August 10, 1994

The likelihood of encountering analytical difficulties must be anticipated. Additional sampling, laboratory analysis and evaluation should be anticipated. Analytical procedures and methodologies must be discussed in greater detail prior to initiation of the refuse and slurry sampling plan.

Please provide a more detailed discussion of the analytical methods and procedures to be used in the slurry sampling plan. This should be submitted by no later than September 1, 1994. Thank you for your help in the permitting process. Please call me or Henry Sauer if you have any questions.

Sincerely,



Daron R. Haddock
Permit Supervisor

cc: Alane Boyd, Eckhoff, Watson & Preator
Fred Finlinson, Callister, Duncan & Nebeker
P. Grubaugh-Littig
H. Sauer
METHODS.SCA