



State of Utah
 GARY R. HERBERT
 Governor

SPENCER J. COX
 Lieutenant Governor

JUN 13 2016

**Registered Mail
 (Return Receipt Requested)**

Department of
 Environmental Quality

Alan Matheson
 Executive Director

DIVISION OF WATER QUALITY
 Walter L. Baker, P.E.
 Director

*C/007/035 Incoming
 CC: Steve D.
 Keenan*

RECEIVED

JUN 17 2016

DIV. OF OIL, GAS & MINING

Mr. Rusty Netz, Environmental Coordinator
 Sunnyside Cogeneration Associates
 P.O. Box 10
 East Carbon, Utah 84520

Subject: UPDES Compliance Evaluation Inspection Report - Sunnyside Cogeneration UT0024759

Dear Mr. Netz:

On May 24, 2016 I met with you and completed a Compliance Evaluation Inspection of Sunnyside Cogeneration Associates. No deficiencies were found, however one requirement was mentioned in the inspection report. Within thirty days of the date of this letter please respond by email that you have addressed the requirement mentioned in the inspection report.

I appreciated your time to facilitate the site visit. Enclosed is a copy of the inspection report. If you have any questions, please contact me at (801) 536-4386 or by e-mail at mherkimer@utah.gov.

Sincerely,

Mike Herkimer, Environmental Scientist
 UPDES Surface Water Section

MH:mc:ag

Enclosures

1. 3560-3 form (DWQ-2016-010275)
2. Inspection report (DWQ-2016-0010279)
3. CEI Checklist (DWQ-2016-010276)
4. Industrial Storm Water Checklist (DWQ-2016-01-278)

cc (w/encl): Brady Bradford, SE District Health Department
 Daron Haddock, Division of Oil Gas & Mines

DWQ-2016-010274



United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., ICIS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac.
Type N	U T 0 0 2 4 7 5 9	1 6 0 5 2 4	C	S	2
20	11	17	18	19	

Remarks

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
1	3	N	N	
67	70	71	72	73 74 75

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Sunnyside Cogeneration Associates #1 Power Plant Road Sunnyside, Utah 84539	Entry Time/ Date 1:45 pm 5/24/2016	Permit Effective Date 7/1/2013
	Exit Time/ Date 4:00 pm 5/24/2016	Permit Expiration Date 6/30/2018

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Rusty Netz, Environmental Coordinator 435-888-4476	Other Facility Data (e.g., SIC NAICS, and other descriptive information) Fossil Fuel Electric Power Generation SIC Code 4911
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Name, Address of Responsible Official/Title/Phone and Fax Number Gerald Hascall, Plant Manager P.O. Box 10 East Carbon, Utah 84520	<p>Contacted</p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input type="checkbox"/> Self Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedule	<input type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input checked="" type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

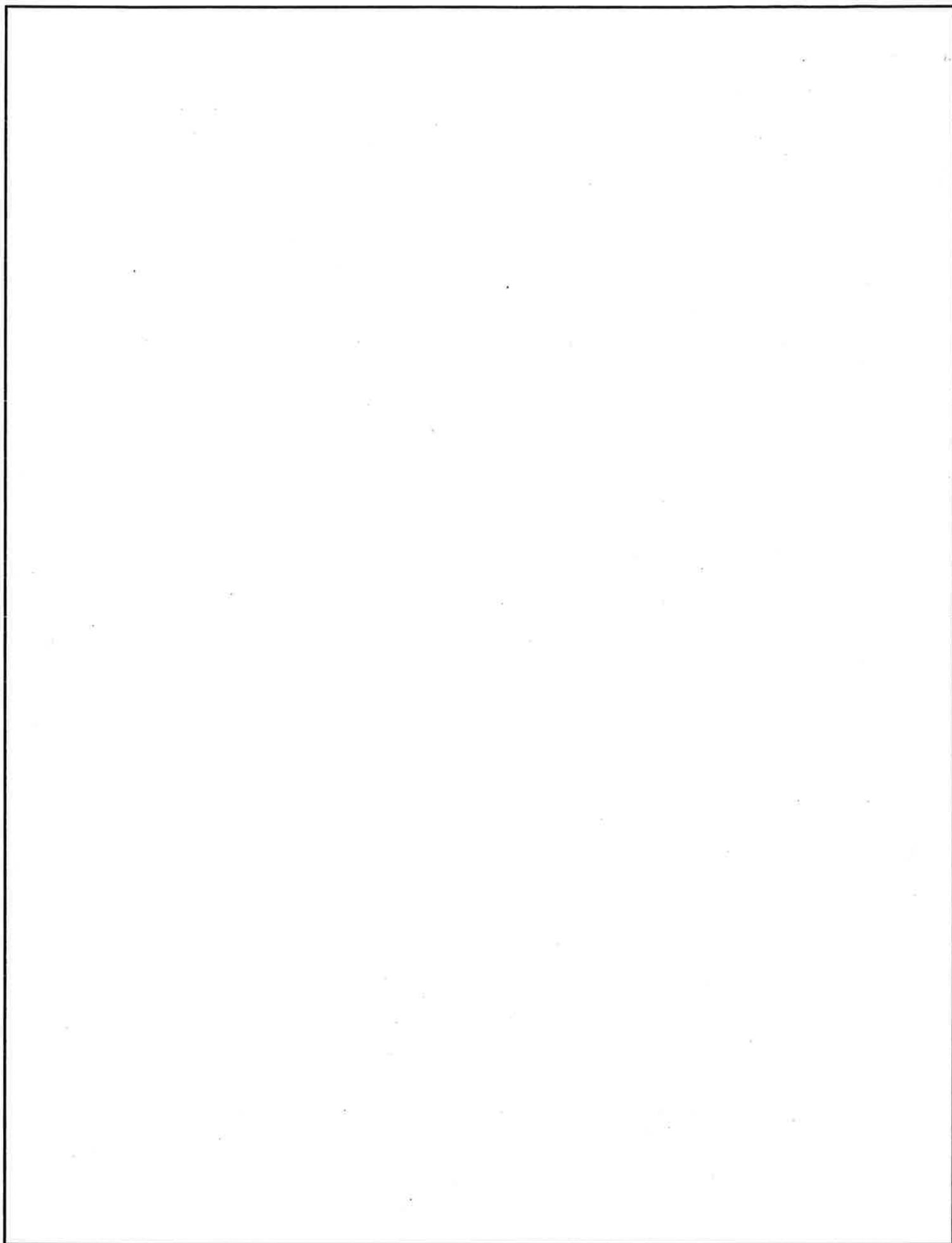
Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description

Name(s) and Signature(s) of Inspector(s) MICHAEL D HERKIMER, ENVIRONMENTAL SCIENTIST	Agency/Office/Phone and Fax Number(s) DIVISION OF WATER QUALITY, (801) 536-4386	Date 6-13-16
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Name and Signature of Management QA Reviewer Kim Shelley, Manager UPDES Surface Water Section	Agency/Office/Phone and Fax Number(s) Division of Water Quality, (801) 536-4385	Date 6-13-16
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INSTRUCTIONS

Section A: National Data System Coding (i.e., ICIS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

- A Performance Audit
- B Compliance Biomonitoring
- C Compliance Evaluation (non-sampling)
- D Diagnostic
- F Pretreatment (Follow-up)
- G Pretreatment (Audit)
- I Industrial User (IU) Inspection
- J Complaints
- M Multimedia
- N Spill
- O Compliance Evaluation (Oversight)
- P Pretreatment Compliance Inspection
- R Reconnaissance
- S Compliance Sampling
- U IU Inspection with Pretreatment Audit
- X Toxics Inspection
- Z Sludge - Biosolids
- # Combined Sewer Overflow-Sampling
- \$ Combined Sewer Overflow-Non-Sampling
- + Sanitary Sewer Overflow-Sampling
- & Sanitary Sewer Overflow-Non-Sampling
- \ CAFO-Sampling
- = CAFO-Non-Sampling
- 2 IU Sampling Inspection
- 3 IU Non-Sampling Inspection
- 4 IU Toxics Inspection
- 5 IU Sampling Inspection with Pretreatment
- 6 IU Non-Sampling Inspection with Pretreatment
- 7 IU Toxics with Pretreatment
- ! Pretreatment Compliance (Oversight)@ Follow-up (enforcement)
- { Storm Water-Construction-Sampling
- } Storm Water-Construction-Non-Sampling
- : Storm Water-Non-Construction-Sampling
- ~ Storm Water-Non-Construction-Non-Sampling
- < Storm Water-MS4-Sampling
- Storm Water-MS4-Non-Sampling
- > Storm Water-MS4-Audit

INSPECTION PROTOCOL

UPDES Permit #: UT0024759
Inspection Type: Compliance Evaluation Inspection
Inspection Date: May 24, 2016
Weather Conditions: Sunny day ~60°F

Mike Herkimer of the Division of Water Quality (DWQ) met with Rusty Netz of Sunnyside Cogeneration Associates (SCA). The purpose and scope of the inspection were explained and as much of the UPDES checklist as could be completed was. This facility has not discharged in over five years. No deficiencies were cited in the last inspection which was on June 28, 2012.

FACILITY DESCRIPTION

Location: Just south of State Highway 123 near the town of Sunnyside in Carbon County, Utah. The main office is located at One Power Plant Road, Sunnyside, Utah 84539. The mailing address is PO Box 10, East Carbon

Effluent Flows: Maximum of 1.76 MGD from all discharge points, with a maximum individual pond discharge of 0.45 MGD

Receiving water: Icelfander Creek which goes to the Grassy Trail Creek which goes to the Price River.

Process: SCA is a steam electric power generating facility. SCA burns waste coal from coal refuse piles and uses nearby groundwater and on rare occasion's surface for cooling purposes. SCA has ten ponds with associated discharge points, all of which have not discharged in the last five years. All of the ponds treat runoff from various parts of the facility. Consequently, the effluent limits vary based on the usage of the area drained. For example, those outfalls in the coal refuse area are permitted similar to coal mine refuse ponds and those ponds receiving runoff from the power plant area or associated with the power production area (ash landfills) are permitted under the electric power generating category.

INSPECTION SUMMARY

Flow Measurements: Flow measurements at all of the ponds are taken by bucket and stop watch. There is no primary or secondary flow measurement devices used, as this facility has had two discharges in the last twelve years.

Recordkeeping: This facility last discharged on September 11, 2013 and no violations were reported on the discharge monitoring report (DMR). On that occasion only Outfall 017 discharged and no other Outfalls. A second discharge occurred on October 22, 2004 and since we have no DMRs in our files that far back, I contacted the facility Environmental Engineer who indicated that there were no violations as a result of the discharge. Since there was no recent DMR information available a reproduction of a DMR was not done.

Storm Water: The storm water pollution prevention plan (SWPPP) was last updated in 2015. The SWPPP was reviewed and it was determined that a certification statement is needed indicating that the facility has been tested for non-storm water discharges from the site. The certification statement should describe the test method used at each discharge point.

Facility Tour: Completed an on-site tour of all of the ten ponds in the permit. There was no discharge occurring at any Outfall.

DEFICIENCIES

1. None.

CORRECTIVE ACTIONS REQUIRED

1. None

REQUIREMENT

1. Need to include a certification statement in the SWPPP. Please send an email to the inspector indicating that this has been done.

LIST OF ATTACHEMENTS (appended to this narrative report with photos and 3560-3 form)

- State checklist
- Photo log (last page of checklist)
- Industrial Storm Water checklist



Photo #1: Outfall 013



Photo #2: Outfall 017



Photo #3: Outfall 018



Photo #4: Outfall 014



Photo #5: Outfall 007



Photo #6: Outfall 009



Photo #7: Outfall 008

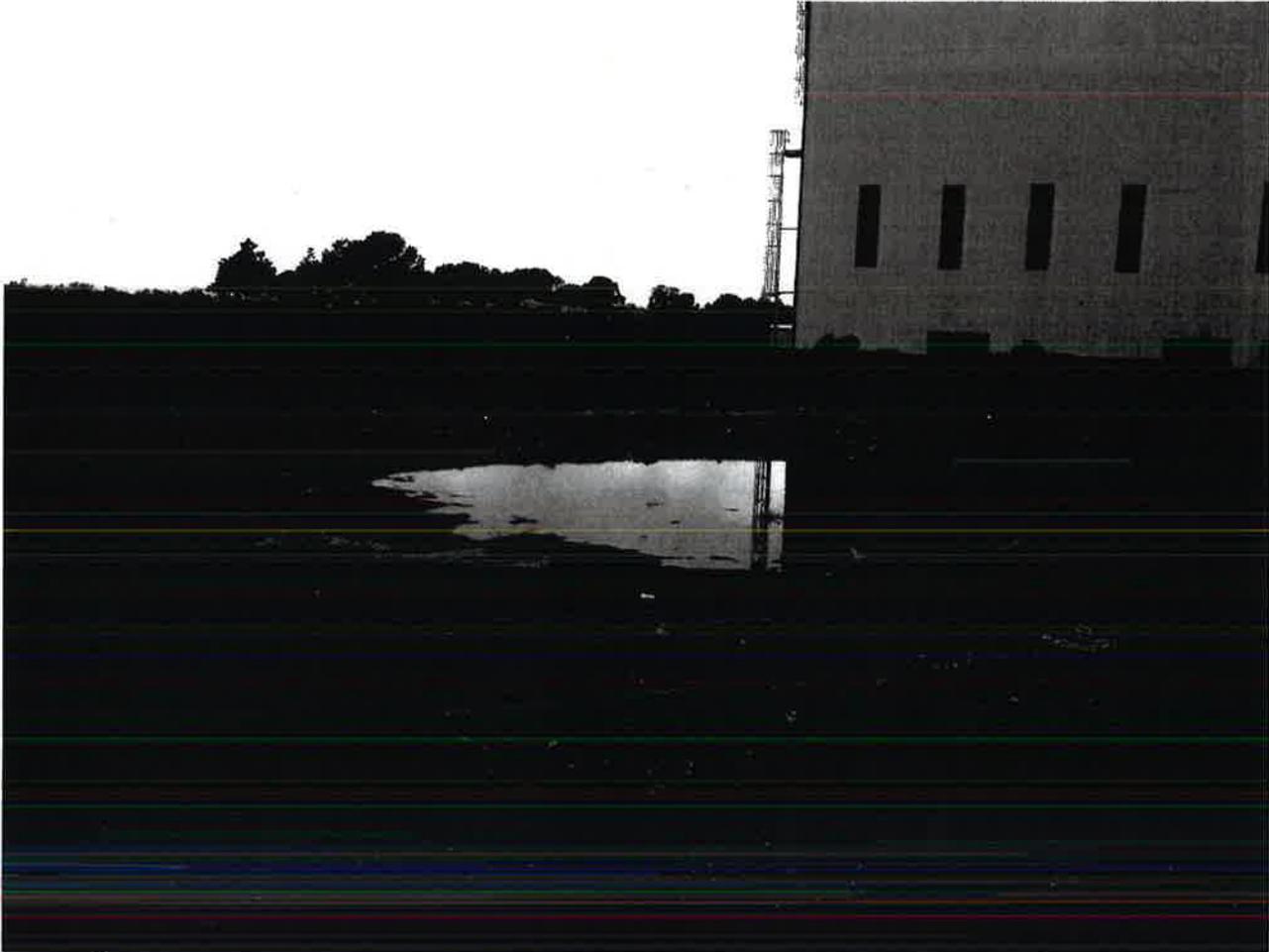


Photo #8: Outfall 012

UPDES Storm Water Industrial Inspection

Background Information

National Database Information		General	
Inspection Type	W	Inspector Name	Mike H
UPDES ID Number	U10024759	Telephone	(801) 536-4386
Inspection Date	5/24/16	Entry Time	1:45 pm
Inspector Type	EPA <input checked="" type="radio"/> State <input type="radio"/> EPA Oversight	Exit Time	

Facility Location Information			
Name/Location/ Mailing Address			
GPS Coordinates	Latitude	Longitude	
Receiving Water(s)	Grassy Trail Creek & Icelandic Creek		
MS4's			

Contact Information		
	Name	Telephone
Owner/Permittee	Sunnyside Logeneration Assoc.	
Operator	" " "	
Co-Permittee		
Facility Contact & Title	Rusty Netz Equip. Engineer	
Authorized Official(s)	Gerald Hascall	

Site Information:	
Industrial Activity	Power Generation
SIC Code(s)	

Basic Permit Information (circle one)			Basic SWPPP Information		
Permit Coverage	<input checked="" type="radio"/> Y	<input type="radio"/> N	SWPPP on site	<input checked="" type="radio"/> Y	<input type="radio"/> N
Permit Type	General	<input checked="" type="radio"/> Individual	SWPPP Satisfactory*	Y	N

UPDES Storm Water Industrial Inspection

Copy of NOI on site?	Y	N	SWPPP Implementation Satisfactory	Y	N
NOI Date	NA		*A Satisfactory SWPPP must be both current and complete (see pages 4, 5, and 6 of this checklist).		

General	
Industrial Activity	<p><i>(describe principal product, production rate, potential pollutants, areas exposed to precipitation, direction of storm water flow)</i></p> <p style="font-size: large; font-family: cursive;">Electrical Power - 51 MW net., coal residuals.</p>
	<p><i>(describe age and size of facility, number of employees, hours of operation)</i></p> <p style="font-size: large; font-family: cursive;">1993</p>

SWPPP Implementation *(complete in field)*

Storm Water Controls	
List the structural and non-structural controls employed by the facility.	<p><i>(provide a brief description of each)</i></p> <p>STRUCTURAL: <i>Sed ponds</i></p> <p>NON: <i>Education, monitoring as needed, inspection of all ponds monthly.</i></p>
Are the controls reasonable and installed correctly and maintained?	<p><i>(indicate "yes" or "no", or if not appropriate, explain)</i></p> <p style="font-size: large; font-family: cursive;">yes.</p>

SWPPP Implementation *(continued)*

Storm Water Controls (continued)

UPDES Storm Water Industrial Inspection

<p>Provide a brief description of other controls that manage/prevent/minimize storm water runoff.</p>	<p><i>(e.g., erosion and sediment controls, exposure minimization, diversion structures, pollution prevention, inlet protection/control at storm drains)</i></p> <p style="font-size: 1.2em; color: blue;"><i>Already mentioned.</i></p>
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Miscellaneous	
<p>Any evidence of discharge to receiving waters?</p>	<p><i>(e.g., storm water runoff, dry weather discharge, co-mingling of process waste water)</i></p> <p style="font-size: 1.5em; color: blue; text-align: center;"><i>NA</i></p>
<p>Do the storm water outfalls on site correspond with those listed on the site map and in SWPPP?</p>	<p><i>(indicate "yes" or "no", or if not appropriate, explain)</i></p> <p style="font-size: 1.5em; color: blue; text-align: center;"><i>Yes</i></p>

SWPPP Review *(can be completed in office)*

General			Notes:
Is a copy of the SWPPP on site?	<input checked="" type="radio"/> Y	<input type="radio"/> N	
Did all "operators" and co-permittees sign the SWPPP?	<input checked="" type="radio"/> Y	<input type="radio"/> N	
Did the signatures include the certification statement?	<input checked="" type="radio"/> Y	<input type="radio"/> N	
Were the signatories authorized to sign?	<input checked="" type="radio"/> Y	<input type="radio"/> N	
Is an individual/team responsible for developing/implementing SWPPP identified (e.g., pollution prevention team)?	<input checked="" type="radio"/> Y	<input type="radio"/> N	

UPDES Storm Water Industrial Inspection

Are employee training records regarding storm water pollution prevention topics included in SWPPP?	<input checked="" type="radio"/> Y	<input type="radio"/> N	
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<u>Site Map</u>			Notes:
Is there a site map?	<input checked="" type="radio"/> Y	<input type="radio"/> N	
Drainage patterns/ outfalls?	<input checked="" type="radio"/> Y	<input type="radio"/> N	
Identification of types of pollutants?	<input checked="" type="radio"/> Y	<input type="radio"/> N	
Location of major structural controls used to reduce pollutants in runoff?	<input checked="" type="radio"/> Y	<input type="radio"/> N	
Name of receiving water(s) or MS4's listed?	<input checked="" type="radio"/> Y	<input type="radio"/> N	
Is receiving water a tributary to waters of the U.S. (if "yes" indicate name of tributary)?	<input checked="" type="radio"/> Y	<input type="radio"/> N	
Location of significant materials exposed to storm water?	<input checked="" type="radio"/> Y	<input type="radio"/> N	
Locations of major spills occurring within 3 years from date of NOI?	<input checked="" type="radio"/> NA	<input type="radio"/> Y	<input type="radio"/> N
Location of fueling, maintenance, loading and unloading, material storage, waste disposal?	<input checked="" type="radio"/> Y	<input type="radio"/> N	

SWPPP Review *(continued)*

<u>Summary of Potential Pollutant Sources</u>			Notes:
Description of activities, materials, features of site with potential to contribute significant amounts of pollutants to storm water?	<input checked="" type="radio"/> Y	<input type="radio"/> N	

<u>Significant Spills & Leaks</u>			Notes:
List of significant spills and leaks over 3 year time period, description of response taken, and actions to prevent similar spills in the future?	<input type="radio"/> Y	<input type="radio"/> N	<input checked="" type="radio"/> NA

UPDES Storm Water Industrial Inspection

Storm Water Controls			Notes:
Does the SWPPP describe the <i>non-structural</i> controls and structural controls that will be used to prevent/reduce discharge of pollutants in storm water runoff?	Y	N	
Does the SWPPP describe other controls that will be used to prevent/reduce off-site tracking or blowing of sediment, dust and raw, final or waste materials, or other solid materials and floating debris?	Y	N	
Does the SWPPP incorporate the 8 baseline controls (good housekeeping, minimizing exposure, PM, spill prevention/response procedures, routine inspections and comprehensive site evaluations, employee training, sediment and erosion control, runoff management)?	Y	N	
Does the SWPPP contain completed routine inspection reports/logs regarding reportable implementation of 8 baseline controls?	Y	N	<i>Inspections in plant files</i>
Does the SWPPP describe the pollutant or activity to be controlled by each selected control and provide an implementation schedule?	Y	N	

SWPPP Review (continued)

Non-Storm Water Discharges			Notes:
Certification that facility has been tested for non-storm water discharges from the site?	Y	N	<i>Rusty will write this up & include in SWPPP</i>
Description of testing method, drainage points, observed results, and date of test?	Y	N	↑

Monitoring			Notes:
Are samples collected within 30 minutes of measurable weather events occurring 72 hours after previous measurable weather event?	Y	N	Yes

~~All areas where walk could occur reported to supervisor~~
Three ASCA's on-site. 5 Use of silt fence & stray holes.

UPDES Storm Water Industrial Inspection

Photograph Log	
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