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CONSOL

Dear, sent to
file
015/015 #2

Consolidation Coal Company
Mid-Continent Region
12755 Olive Boulevard
St. Louis, Missouri 63141
(314) 275-2300

May 3, 1993

RECEIVED

MAY 07 1993

DIVISION OF
OIL GAS & MINING

Mr. Lowell Braxton
Utah Division of Oil, Gas & Mining
355 W. North Temple
3 Triad Center - Suite 350
Salt Lake City, UT 84180-1203

Re: Emery Mine - Permit # ACT 015/015
Clarification of 1st Quarter 1993 UPDES
Discharge Monitoring Reports (DMR)

Dear Mr. Braxton

As per my conversation this day with Steve Demczak of your staff, the following discussion is provided to clarify DMR information submitted on April 12, 1993 for UPDES Permit No. 0022616. Mr. Demczak observed that total dissolved solids (TDS) values of 3958, 4162 and 4068 ppm appear to have exceeded the permit limit of 3500 ppm for January, February and March at Outfall 001. The UPDES permit states that TDS values shall be determined by a flow weighted average of all permit discharges on the day of sampling. Since the values reported for Outfall 001 are not weighted averages they cannot be used to judge compliance with the TDS permit limit.

Due to the nature of the drainage control system, Outfalls 001 and 003 are the only outfalls that discharge at the mine. These outfalls are always sampled on the same day so that a flow weighted TDS average can be reported. The corresponding flow weighted maximum values for the 1st quarter of 1993 were 2878, 2759 and 2690 ppm for January, February and March. These values are less than the permit limit and therefore no exceedances occurred or were reported.

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Prior to this quarter at the direction of Harry Campbell of the Utah Division of Water Quality, DMR's were completed using the calculated flow weighted maximum TDS value for both Outfalls 001 and 003 for any particular month. Actual TDS values analyzed for each outfall were not reported on the DMR's. At the end of 1992 Division supervision of this permit changed from Mr. Campbell to Steve McNeal. At Mr. McNeal's direction the actual and not the calculated flow weighted TDS values were reported for the 1st quarter with additional pages of information attached to show the weighted averages. On subsequent DMR submissions references to enclosed sheets containing weighted average TDS values will be posted on the DMR form.

If you have any questions concerning this information, please call.

Sincerely,



Richard J. Denning
Permit Coordinator

RJD/vms

Enclosures

cc: Steve Demczak - Utah DOGM
Steve McNeal - Utah DEQ