



Ken Payne
Vice President & General Manager

**Southern Utah
Fuel Company**

0006

P.O. Box P
Salina, Utah 84654
(801) 529-7428
(801) 637-4880 (Mine)

RECEIVED
FEB 14 1983
Utah Dept. Of
Environmental Health

Subsidiary of
Coastal States
Energy Company

RECEIVED

FEB 14 1983

BUREAU OF WATER
POLLUTION CONTROL

APR/04/002
#7

February 1, 1983

Mr. Calvin K. Sudweeks
Executive Secretary
Utah Water Pollution Committee
P.O. Box 250
Salt Lake City, Utah 84110

RE: TDS Violations of NPDES
Permit No. UT-0022918

Dear Mr. Sudweeks:

During the past several months, Southern Utah Fuel Company has consistently exceeded the Total Dissolved Solids daily maximum discharge limitation of 650 mg/l from the 002 discharge. The sources for the TDS concentrations are varied and change from season to season. The sources identified to date include:

1. Evaporative concentrating of the sediment pond--the outlet of which constitutes discharge 002;
2. Washwater from equipment cleaning in the shop;
3. Precipitation event runoffs which carry surface accumulations of salt from the Mancos soils and also of salt stored for snow removal purposes; and
4. Salt imported with ice and slush on the undercarriages of the highway coal trucks. This concentrated material, which comes from state and county roads, drops from the trucks as they await loading on the warm southern exposure and appears to account for a significant amount of the TDS during the winter season.

Analysis of these sources does not indicate a practical solution to the problem of TDS concentration. Dilution with well water would reduce the concentration but in turn would increase the total salt load. Dilution with a portion of our mine water discharge would reduce the concentrations at point 002, but would incur a pumping cost and would not result in better or worse water quality below the confluence of the North and South forks of Quitcupah Creek.

Mr. Calvin K. Sudweeks

February 1, 1983

Page 2

Based on the above factors, we are requesting that your office review the 650 mg/l TDS limitation and, if possible, grant an exemption to this requirement. It is our recommendation that a total daily loading restriction be applied instead. We feel that this approach is justified based on the following factors:

1. A low average discharge flow of 4-5 gpm;
2. A rapid dilution by water from Quitchupah Creek of 1:1 minimum with an average of approximately 3:1 of 450 mg/l TDS water;
3. A continuing mixing and dilution over a 2½ mile reach to the confluence with the North Fork of Quitchupah Creek at which point dilution mixing is approximately 200:1 with a 500 mg/l TDS concentration (of which 750 gpm is 450 mg/l TDS mine water discharge from our point source 003); and
4. A water use classification of 3A and 4, recognizing that Quitchupah Creek is totally dewatered during the summer to irrigate Mancos farmland.

We are willing to work with you and your staff to resolve this problem and will provide additional data upon request. It is our intention to eliminate the need to constantly file violation notices and to reduce the paper mill work load where possible.

Sincerely,



Ken Payne
Vice President and General Manager

KAF:dlj

Enclosure

xc: Steve McNeal
Department of Health