

0012



RECEIVED
FEB 29 1988

File ACT/41/082
file #2
Norman H. Bangarter
Governor

Suzanne Dandoy, M.D., M.P.H.
Executive Director

DIVISION OF
OIL, GAS & MINING

February 25, 1988

Susan C. Linner
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

RE: SUFCO Waste Rock
Disposal Site

Dear Ms. Linner;

We appreciate the opportunity to review Southern Utah Fuel Company's Response to the Initial Review Document for the Waste Rock Disposal Site, for the Convulsion Canyon Mine in Sevier County.

The revisions made have not altered our initial comments dated Sept. 23, 1987. However, we would like to re-emphasize a couple of points. The Owner will be required to submit full detailed plans and specifications for construction and operation of the sediment pond and appurtenances. These plans must be reviewed and approved by the Bureau of Water Pollution Control prior to construction. The facilities must also be inspected when completed, prior to use.

A discharge permit will be required prior to operation of the pond. The permit will outline monitoring requirements which must be followed carefully. Application for the permit should be made immediately to allow time for analysis and processing.

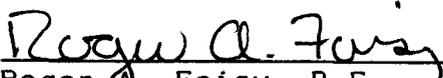
Table 1.4-1, List of Violations, is of concern to us because of the recorded violations involving construction without approval, monitoring violations, failure to construct facilities in accordance with approved plans, etc. It will be necessary for the owner to notify the Bureau of Water Pollution Control when construction begins and when facilities are complete and planned for use. Bureau personnel may then conduct interim and final inspections to evaluate compliance with approved plans and specifications. We will monitor this project very closely, on a local basis, as construction begins.

We appreciate the fact that the owner has already applied

to the Bureau of Air Quality for a permit covering fugitive dust emissions. We will anticipate the same timely cooperation with the Bureau of Water Pollution Control.

Thank you. If we can be of further help please call my District office at 896-5451 in Richfield or the Bureau of Water Pollution Control at 538-6146 in Salt Lake City.

Sincerely,


Roger A. Foisy, P.E.
District Engineer

cc: Kiran Bhayani, Bureau of Water Pollution Control
Dale Parker, Division of Environmental Health