



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Norman H. Bangarter
Governor

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Executive Director

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Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

December 10, 1992

TO: Mine File

FROM: Lowell P. Braxton, Associate Director, Mining *LOB*

RE: UPDES Permit No. UT0022918, Exceedances Effluent Point 003, Southern Utah Fuel Company, Convulsion Canyon Mine, ACT/041/002, Sevier County, Utah

This file memo documents telephone conversations the week of October 5, 1992, between Lowell Braxton, DOGM and Kerry Frame, SUFCO. The subject of the conversations was the level of involvement between the Department of Environmental Quality, Division of Water Quality (DEQ/DWQ), and SUFCO with respect to exceedances of the 30-day average for TDS at the above-cited sample point. The Division's basis for this knowledge was routine monitoring reports provided by SUFCO to DEQ/DWQ and DOGM.

Subsequent to the conversations referenced above, Mr. Frame faxed copies of correspondence between SUFCO and DEQ/DWQ outlining action by SUFCO that may have achieved some reduction in TDS effluent, and indicating additional attention that was being given the problem by SUFCO.

DEQ/DWQ's acknowledgement of the problem (letter to SUFCO September 30, 1992) did not discuss enforcement action at that time. This letter states the issuing agency's finding that enforcement action was not recommended at the time of writing. At the time of the conversation, SUFCO had initiated operational changes that may have contributed to a downward trend in TDS. The company also acknowledges that additional remedial activities may need to be implemented after appropriate study and review by both SUFCO and DEQ/DWQ.

Enforcement actions by DOGM are not required on self-reported exceedances. Given the fact that SUFCO is presently negotiating a solution to the TDS problem with DWQ, the UPDES permitting agency, DOGM will take no enforcement action. When SUFCO and DEQ/DWQ reach agreement on remedial action on TDS, this determination should be incorporated into the Convulsion Canyon MRP.

Encl.

vb
sufdeg

Original #1/002 #2
CC: Steve Danczak
L. Braxton
D. Haddad
R. Summers

FACSIMILE COVER PAGE



Southern Utah Fuel Company
A SUBSIDIARY OF THE COASTAL CORPORATION
397 SOUTH 800 WEST • SALINA UT 84654 • 801/637-4880

Salina Office (801) 529-7428
Salina Fax No. (801) 529-3659

Mine (801) 637-4880
Mine Fax No. (801) 534-3296

TO: LOWELL BRAXTON LOCATION: DOGM
FROM: KERRY FRAME LOCATION: SUFCO

THIS TRANSMISSION CONSISTS OF 5 PAGES INCLUDING COVER PAGE

MESSAGE:

SUBSEQUENT TO OUR PHONE DISCUSSION
LAST WEEK (1 DAY), WE RECEIVED A
SIMILAR REQUEST FOR INFORMATION FROM
DEQ. I'VE ATTACHED A COPY OF
BOTH THEIR LETTER AND KEN'S RESPONSE.

If you have trouble with this transmission, please call Southern Utah Fuel Company at (801) 529-7428.



State of Utah
DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WATER QUALITY

Norman H. Bangert
Governor
Kenneth L. Alkema
Executive Director
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Director

288 North 1460 West
P.O. Box 144870
Salt Lake City, Utah 84114-4870
(801) 538-6146
(801) 538-6016 Fax
(801) 538-6621 T.D.D.

September 30, 1992

RECEIVED

OCT 6 1992

SOUTHERN UTAH
FUEL COMPANY

Mr. Ken Payne
General Manager
Southern Utah Fuel Company
397 South 800 West
Salina, Utah 84654

RE: UPDES Permit No. UT0022918
Request For Information

Dear Mr. Payne:

In reviewing your submitted discharge monitoring reports (DMR) for the past six months February through July 1992, we note that you have had numerous violations of your 30-day average TDS (Total Dissolved Solids) (see attached graph). Please provide to this office by October 15, 1992, a written explanation for these permit violations and what steps you have taken to rectify the situation. If this situation persists we may have to initiate formal enforcement action in order to resolve this issue. If you have any questions in this matter, please feel free to contact Paul Krauth or me at 538-6146.

Sincerely,

Donald A. Hilden, Ph.D., Manager
Permits & Compliance Section

Enclosures

DAH:pk/st

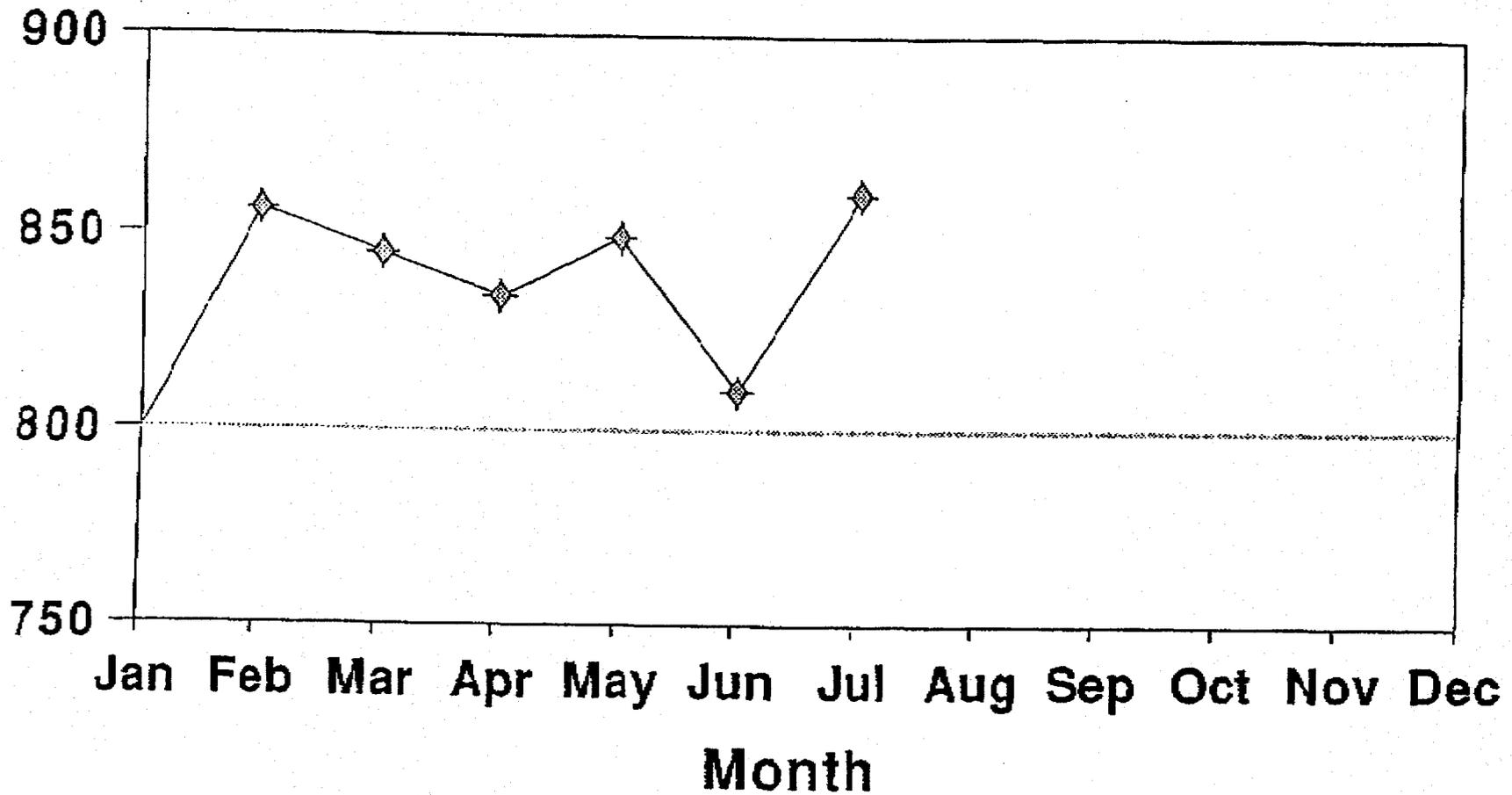
cc: David Rocco Ariotti - District Engineer, w/encl
Gary Angott - Southeast District Health Department, wo/encl
Mike Reed, EPA Region VIII, NPDES Branch, w/encl.

SEARCHED
FILED UPDS

SUFCO

TDS (outfall 003)

1992





Coastal
The Energy People

KEN PAYNE
VICE PRESIDENT &
GENERAL MANAGER
SOUTHERN UTAH FUEL COMPANY

October 14, 1992

Dr. Donald A. Hilden
Permits & Compliance Section Manager
Department of Environmental Quality
Division of Water Quality
P.O. Box 144870
Salt Lake City, Utah 84114-4870

RE: DEQ September 30, 1992 Request for Information

Dear Dr. Hilden:

Southern Utah Fuel Company has experienced a number of exceedances of effluent point 003 this year of its UPDES Permit No. UT0022918 with respect to the 30 day average for TDS. All of these exceedances have been less than 10 percent of the permit limit of 800 mg/l. Southern Utah Fuel Company has been following this issue closely for a number of months.

The suspected cause of this exceedance history is believed to be related to the gypsum rockdust in use at the SUFCO Mine. The contribution to the problem has been under investigation. One of the complicating factors is the handling characteristics of different types of rockdust. Our current equipment that has been in place for over 10 years is designed to handle gypsum rockdust.

Different alternatives to gypsum rockdust including equipment changes that would be necessary to use another type of rockdust are being investigated. The results of these investigations are being evaluated.

The origin of high TDS waters is being traced with detailed in mine studies. Hopefully these studies will identify possible corrective actions that may be taken through changes in operational procedures.

The magnitude of these exceedances suggest that compliance may be achieved through implementation of operational changes. The recent decline in TDS levels to 820 to 830 mg/l in August followed one such operational change.

Southern Utah Fuel Company is committed to solving this TDS problem and is actively pursuing a solution. We anticipate having sufficient information to enable us to review the status of this situation by December 1, 1992. At that time we would appreciate the opportunity to review progress with the members of the Division and to present recommendations for your approval.

Sincerely,
SOUTHERN UTAH FUEL COMPANY



Ken M. Payne
Vice President and General Manager

KMP/WKS