



State of Utah

Department of  
Environmental Quality

Richard W. Spratt  
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DIVISION OF WATER QUALITY  
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*Governor*

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FILE COPY

July 20, 2007

Michael J. Blakey  
Agent for Sunnyside Cogeneration Associates  
P.O. Box 10  
East Carbon, Utah 84520

Subject: Clarification of Compliance Monitoring Requirements  
Ground Water Discharge Permit UGW070002

Dear Mr. Blakey:

The Division of Water Quality has reviewed the Semi-Annual Monitoring Report dated July 12, 2007 for the Sunnyside Cogeneration Associates (SCA) subject permit. As stated in the cover letter of the report, total dissolved solids (TDS) was above the permit protection level for wells MW-1 and MW-7, and selenium was above the permit protection level for well MW-1.

Based on a review of historical data, we concur with SCA's hypothesis that the elevated concentrations of TDS and selenium are naturally occurring. As shown by the analytical results of an ash sample in the January 25, 2006 SCA Semi-Annual Monitoring Report, TCLP selenium was non-detect (<0.1 mg/l), soluble sulfate was non-detect (<5 mg/l), and soluble TDS was 800 mg/l. However, the majority of the TDS in well MW-1 (54%) and well MW-7 (58%) indicates that sulfate is the biggest contributor to the TDS values. The underlying Mancos Shale formation is known to contain gypsum, a source of sulfate, and selenium. Therefore, based on these data, DWQ concurs that the source of elevated selenium and TDS is probably naturally occurring leaching from the Mancos Shale and not the ash landfill. Variations in the yearly precipitation may also impact the concentrations observed over time.

Based on the analysis above, SCA should proceed with a semi-annual monitoring frequency and is not required to conduct accelerated monitoring. If you have any questions regarding this letter, please contact Keith Eagan at 801-538-6017.

Sincerely,

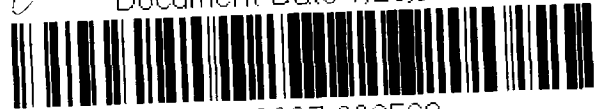
Rob Herbert, P.G., Manager  
Ground Water Protection Section

cc: SE Health Department

RFH/KEE:mr

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