0019

Norman H. Bangerter
Governor
Dee C. Hansen
Executive Director
Dianne R. Nielson, Ph.D.
Division Director

State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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

August 7, 1989

Mr. Keith Welch
Environmental Coordinator
Coastal States Energy Company
175 East 400 South Suite 800
Salt Lake City, Utah 84111

Dear Mr. Welch:

Re: Conditional Approval, Amendment, Revised Water Monitoring Plan, Utah Fuel Company, Skyline Mine, ACT/007/005-88(A), Folder #2, Carbon County, Utah

The Division has completed review of your company's submittal received July 19, 1989. The plans were reviewed by Rick Summers, Reclamation Hydrologist, of the Division's technical staff. Written commitment to conditions 1-5 as detailed in the attached technical review memo by September 1, 1989 will consumate final approval. Please submit fourteen (14) copies of revised pages for the Skyline Mining and Reclamation Plan.

If you have any questions, please call Randy Harden or me.

Sincerely,

Susan C. Linner

Susan C. Linner
Reclamation Biologist/
Permit Supervisor

cl
Attachment
cc: J. Helfrich
R. Harden
BT45/277

an equal opportunity employer

Norman H. Bangerter
Governor
Dee C. Hansen
Executive Director
Dianne R. Nielson, Ph.D.
Division Director

State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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

August 2, 1989

TO: Susan C. Linner, Permit Supervisor

FROM: Rick P. Summers, Reclamation Hydrologist RPS

RE: Water Monitoring Plan Modification and Request to Cease Monitoring of Nitrites and Nitrates Under Special CO Abatement Monitoring Plan, Utah Fuel Company, Skyline Mine, ACT/007/005, Folder #2, Carbon County, Utah

SUMMARY:

The information reviewed was submitted a a portion of the most recent 5 - year renewal package received on July 19, 1989 and a request to cease the abatement monitoring plan for nitrites and nitrates received June 2, 1989. The proposal is approvable at this time if the conditions in the recommendation section of this memo are satisfied. It is to be noted that the monitoring comments in this review are restricted to the surface water monitoring proposal. Groundwater monitoring is currently under review by Dave Darby of the Division staff.

REVIEW:

Basically, the proposal reduces the frequency of data collection from that contained in the original MRP. Samples will be collected three times per year for most sites and four times per year (as accessibility permits) for sites located at the mine site and on Eccles Creek.

Parameters to be analyzed are presented on Tables 2.3.7-1 and 2.3.7-2. Division policy requires that monitoring programs be revised to correspond to current monitoring guidelines during the mid-term or five - year permit renewals. The proposed list includes the parameters required by the 1986 Division guidelines for operational phase monitoring except for the following parameters: Dissolved Oxygen (abbreviated schedule), Total Hardness, Acidity, and Carbonate.

an equal opportunity employer

It is felt that these parameters (with the exception of dissolved oxygen) can be waived due to the fact that the baseline monitoring conducted by the operator under the original permit did not sample for those constituents. However, considering the type and size of the operation, the potential for increased stream temperatures (groundwater discharge and sediment pond warming), and the quality of the aquatic community present in Eccles Creek, the Division will require that dissolved oxygen be measured on stations CS - 2, CS - 3, CS - 6, VC - 6, and VC - 9 for all samples.

In turn, the operator has added some additional parameters to the schedule. These parameters include turbidity, nitrates, phenols, total organic carbon, cyanide, fluoride, ammonia, and copper.

It is additionally proposed that station UP1 - 3 be deleted from the monitoring schedule. The Division finds this acceptable due to the low probability of detection of mining related impacts at this site. The site is located at the outlet of Electric Lake and quality changes would likely be masked by the large volume of water stored in the reservoir. Additionally, changes in flow in Huntington Creek would be more logically detected at station UPL - 10 located at the inlet to Electric Lake and within the mine permit area.

CONCLUSIONS:

The following items should be corrected for final approval of the surface monitoring plan. Some comments relative to the groundwater monitoring plan have been included for clarification.

1. Table 2.3.7 - 2 should add the months that sampling will occur for the winter monitoring identified in the paragraph at the bottom of the table.

2. Dissolved oxygen should be added to the field parameter list on Table 2.3.7 - 2.

3. The monitoring for nitrites and nitrates required under the special abatement monitoring program may be ceased following confirmation samples collected by the Division during the scheduled August inspection that demonstrate the decreased levels of those parameters. The Division will notify the operator when the sample results have been received and monitoring may be terminated.

4. Section 2.3.7, Groundwater monitoring, paragraph 5, should be revised to clarify that water level samples will be collected three times per year as per the schedules on Tables 2.3.7. -1 and 2.3.7 - 2. Similarly, paragraph 2, on page 2-33 does not define an enforceable schedule for the collection of the water level data. If the "observation wells" are the same wells as those identified in paragraph 5 and the recommended changes are made to that paragraph, this paragraph could be eliminated.

5. The permit should state that the sample results will be submitted to the Division within 90 days of sample collection instead of end of quarter. This will make the reporting more consistent with UMC 817.52 (b)(1)(ii) and ensure timely identification of sampling problems and analysis.

cc: Randy Harden
Mike DeWeese
Harold Sandbeck
BT6005/159-161