



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

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April 29, 1988

TO: John Whitehead, Permit Supervisor
FROM: Tom Munson, Reclamation Hydrologist *TM*
RE: Review of Plateau Mining Company's Hydrologic Report for 1987, Star Point Mine, ACT/007/006, Folder #2, Carbon County, Utah

History

Plateau Mining Company's (Plateau) 1987 Annual Hydrologic Report was received March 30, 1988. An assessment of monitoring adequacy will be based on the requirements of the PAP and any subsequent amendments to their water monitoring program. A revision to the water monitoring plan was received March 30, 1988 and will be reviewed in the context of this memo, as well.

Analysis

Based on an assessment of the Division's baseline parameter list and the commitments in the PAP the operator has failed to comply with the requirements of the Division and their own permit. In almost every case the operator has failed to consistently monitor a full suite of baseline or operational parameters during each sampling run, if appropriate.

Over the course of a year, the operator manages to complete the list of baseline parameters using the sum of parameters from each individual sampling date during the course of the year, but does not maintain any consistency in sampling a set list of parameters for each run.

The commitment to monitor all springs in the Division's April 27, 1987 letter was carried out in 1987.

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Recommendations

1. The operator shall provide the actual lab data sheets which document sampling of the missing baseline parameters on all required baseline sites for each sampling date where parameters are missing.
2. If the operator can not provide documentation of the missing parameters he will be required to make up the missing baseline data and begin sampling baseline and operational parameters consistently and completely in accord with his approved PAP and the requirements of the Division's water monitoring guidelines until an amendment to his water monitoring plan is approved.
3. In regards to the operator's revised PAP language (i.e., clarification of the water monitoring plan commitments) the operator does not need to sample the complete baseline parameter list once a year as shown in Table 80, but must sample for baseline parameters for two years prior to mining and at high and low flow every fifth year preceeding repermitting.

The operator also needs to revise Table 80 and needs to revise Table 81 to 82 to meet the Division's water monitoring guideline requirements until such time as an amendment to their water monitoring plan is approved. I refer the operator to the Division's February 5, 1988 letter to Plateau Mining Company regarding the review of stipulation responses. Please note the stipulations listed under Regulation 817.52.

djh
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