

a

#3685

R

WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

November 8, 2011

TO: Internal File

THRU: Steve Christensen, Permit Supervisor *SC*

FROM: April A. Abate, Environmental Scientist III *AAA*
11-8-2011

RE: 2010 4th Quarter Water Monitoring, Hiawatha Coal Company (HCC), Hiawatha Mine, C/007/0011, Task #3685

HCC has supplied schedules for water monitoring and parameter reporting in Tables 7-12 through 7-17, in the Mining and Reclamation Plan (MRP), updated on October 11, 2011. Water monitoring locations can be found on Plates 7-1 and 7-2 in the Hiawatha MRP. The Hiawatha mine holds Utah Discharge Elimination System (UPDES) Permit #UT0023094. A total of 13 outfalls are permitted at the site. Two of these outfalls discharge consistently (D001 and D002).

The Hiawatha Mine is currently in temporary cessation. There is currently no underground mining taking place.

1. Was data submitted for all of the MRP required sites? YES NO

Identify sites not monitored and reason why, if known:

Springs HCC monitors six springs at the minesite: SP-2, SP-4, SP-5, SP-11, SP-12 and SP-13. Operational sampling was established in the MRP as two times per year, for spring sites, in June and October. A recent amendment approved by the Division on October 11, 2011 allowed these spring locations to be suspended from the sampling plan until two years prior to underground mining resuming.

Streams HCC monitors 10 stream locations at/near the mine site, ST-1, ST-2, ST-2B, ST-3, ST-3A, ST-3B, ST-4, ST-4A, ST-4B, and ST-5. HCC currently monitors field parameters of streams on a monthly basis from May through August. Operational sampling occurs in April and September (Table 7-16).

UPDES There are a total of 13 UPDES sample locations listed in Permit #UT0023094 for the Hiawatha Mine used to establish discharge quality. UPDES locations are monitored quarterly according to permit. The UPDES locations D003 through D013 listed in the current UPDES permit typically do not discharge. The current permit is due to expire in December 2014. All UPDES sample locations are outlined below:

Pond No.	Location
D001	Mohrland Portal
D002	Overflow at Hiawatha
D003	Upper Coal Storage Yard
D004	North of Slurry Pond No. 1
D005	East of Slurry Pond No. 4
D006	North East of Slurry Pond No. 5
D007	South East of Slurry Pond No. 5
D008	Middle Fork Mine Yard
D009	South Fork Mine Yard
D010	King Mine 4 Discharge
D011	South Fork Truck Loading Facility
D012	Mohrland Pipeline Drain
D013	King 6 Water Tank Overflow

During the fourth quarter of 2010, locations D003 through D013 did not report any flow data. Monthly data from UPDES locations D001 and D002 were reported this quarter. Analytical data were collected from outfalls D001 and D002 on November 29, 2010.

2. Were all required parameters reported for each site?

Springs YES NO

Fourth quarter 2010 sampling was required for springs in the month of October. Springs have not been sampled since October 2009.

Streams YES NO

Operational parameters were collected on October 28, 2010 for select stream sample locations. However, samples were not collected at the following stream sites, as required by the MRP: ST-2, ST-2B, ST-3A, ST-3B.

UPDES YES NO

Total iron is not being reported for sample D001 and D002.

3. Were irregularities found in the data?

Springs YES NO

Not applicable because required springs were not sampled.

Streams YES NO

UPDES YES NO

4. On what date does the MRP require a five-year resampling of baseline water data.

No baseline sampling obligations are stipulated in the Hiawatha MRP.

5. Based on your review, what further actions, if any, do you recommend?

The Permittee claims that the above-noted spring and stream samples were not collected because Right-of-Entry access issues are no longer available to HCC. The Permittee submitted an amendment to reduce the water monitoring of all springs until two years prior to any underground mining. The Division approved the amendment on October 11, 2011 to discontinue monitoring on the springs. However, a gap in monitoring exists between October 2009 when monitoring the springs was last performed up through the present time when the amendment was approved.

Field parameters for stream monitoring locations were not collected at the following stream sites, as required by the MRP: ST-2, ST-2B, ST-3A, and ST-3B during the 4th quarter.

Furthermore, total iron analysis data was missing from the quarterly analysis performed on November 29, 2010 for UPDES samples D001 and D002.

6. Does the Mine Operator need to submit more information to fulfill this quarter's monitoring requirements?

If the Permittee cannot provide evidence that data was collected from spring sample locations from October 2009 – October 2011; and stream locations: ST-2, ST-2B, ST-3A, and ST-3B plus total iron data from D001 and D002 for 4th quarter 2010, then the Division views this as being out of compliance with the requirements of the MRP.

7. Follow-up from last quarter, if necessary.

None