

#4120
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WATER QUALITY M E M O R A N D U M

Utah Coal Regulatory Program

December 17, 2012

TO: Internal File

THRU: Steve Christensen, Permit Supervisor *SKC*

FROM: April A. Abate, Environmental Scientist III *(AAC) 12-18-2012*

RE: 2012 2nd Quarter Water Monitoring, Hiawatha Coal Company (HCC), Hiawatha Mine, C/007/0011, Task #4120

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?

Identify sites not monitored and reason why, if known:

Springs YES NO

Currently, no spring locations are monitored. Hiawatha will resume monitoring of the springs listed on Table 7-17 two years prior to the start up of any underground mining activities.

Streams YES NO

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 and the month of October. Operational sampling occurs in April and September (Tables 7-13).

All stream sampling locations required were monitored for field parameters on a monthly basis during the 2nd quarter. Operational sample monitoring was performed on the stream locations during the May 31, 2012 sampling event.

No access was reported for ST-2 on April 26, 2012 - no reason given. ST-3, ST-3A, ST-3B, ST-4, ST-4A, ST-4B all reported no flow during each month of the second quarter of 2012.

UPDES

YES NO

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 second quarter of 2012, monthly data from UPDES locations D001 and D002 were reported this quarter. Analytical data were collected from outfalls D001 and D002 on May 31, 2012.

The operator failed to report any monitoring data from locations D003 through D013 this quarter. Under the Utah Coal Rules R645-301-731.212 and 731.223, data will be submitted at least every three months for each monitoring location.

2. Were all required parameters reported for each site?

Springs YES NO

No springs are currently required to be sampled in the Hiawatha monitoring plan.

Streams YES NO

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UPDES YES NO

The flow rate of discharge from the Morhland portal discharge (UPDES D001) this quarter averaged 340 gpm while flow rates from the mine to Miller Creek (UPDES D002) were reported consistently at 130 gpm all three quarters. Total Dissolved Solids (TDS), oil and grease, total suspended solids, and total iron were all either not detected, or within the acceptable UPDES permit limits.

3. Were irregularities found in the data?

Springs YES NO

Not applicable

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?

A Notice of Violation (NOV# 10101) was issued on December 18, 2012 for failure to report data from UPDES sample locations UT-003 thru UT-013. These locations typically do not report any flow conditions, however, the Permittee is still required to report a "no flow" condition to the Division.

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

No.

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

None.