

0008

WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

April 24, 2007

JK

TO: Internal File

THRU: D. Wayne Hedberg, Permit Supervisor *DWH*

FROM: James D. Smith, Environmental Scientist - Hydrology *DS 04/24/07*

RE: 2006 Fourth Quarter Water Monitoring, Nevada Electric Investment Corporation, Wellington Preparation Plant, C/007/0012

The Wellington Preparation Plant is currently idle. No mining or coal processing activities currently take place there, nor is the site in active reclamation. Water-monitoring requirements are in Sections 7.23 and 7.31.2 through 7.31.22, and Tables 7.24-2 and 7.24-5 of the MRP.

1. On what date does the MRP require a five-year re-sampling of baseline water data.

Baseline parameters will be collected in the year preceding permit renewal. The next renewal submittal is due 08/10/09 and the next renewal is due 12/10/09, so five-year resampling should be done in 2008.

2. Were data submitted for all of the MRP required sites?

There is no spring or in-mine monitoring at this site.

Streams and Ponds

YES NO

The Permittee is required to analyze samples from streams at SW-1, SW-2A, SW-3, and SW-4 and from ponds at SW-5, SW-6, SW-7, and SW-8 for the parameters in Table 7.24-5, and to measure flow only at SW-2. In addition, samples from SW-4 and SW-5 are to also be analyzed for benzene, toluene, ethylbenzene, xylene (BETX), naphthalene, and propylene glycol. Monitoring is to be done quarterly.

SW-3, SW-4, and all the ponds were dry during the fourth quarter 2006.

Wells

YES NO

The Permittee is required to analyze samples from GW-1, GW-3, GW-4, GW-6, GW-7, GW-8, GW-9, GW-9B, GW-10, GW-12, GW-13, GW-14, GW-15A, GW-15B, GW-16, and GW-17 for the parameters in Table 7.24-2, and to measure depth only at GW-2. In addition, samples from GW-4 and GW-6 are to also be analyzed for BETX, naphthalene, and propylene glycol. Monitoring is to be done quarterly.

UPDES

YES NO

Six UPDES permitted outfalls at the Wellington Preparation Plant are monitored monthly: #UTG040010-003, 004, 005, 006, 007, and 008.

There was no reported flow at any of the UPDES sites during the fourth quarter 2006.

3. Were all required parameters reported for each site?

BETX, naphthalene, and propylene glycol are monitored at SW-4, SW-5, GW-4, and GW-6. Analysis results have not been reported in the electronic database since March 2001. The explanation has been given that originally there were not database identification numbers assigned to those parameters so they couldn't be entered at the Division's web-site. Instead, the Permittee's understanding with the Division was that the lab reports would be in the Permittee's files (currently kept by Patrick Collins of Mt. Nebo Scientific, Resident Agent for the Wellington Prep Plant) and available to the inspectors for review (E-mail from Karla Knopp, 04/19/2007 10:40 AM).

Streams and Ponds

YES NO

SW-4 and SW-5 were dry fourth quarter, so analyses for BETX, naphthalene, and propylene glycol were not possible.

Wells

YES NO

At GW-3 and GW-17, static water levels were measured but inflow was not sufficient to allow purging and sampling.

At GW-4 and GW-6, BETX, naphthalene, and propylene glycol were not reported.

UPDES

YES NO

4. Were any irregularities found in the data?

Listed parameters were more than two standard deviations from the mean. An asterisk (*) indicates this is not a parameter specifically required by the MRP.

Streams and Ponds YES NO

SW-1: DO

Wells YES NO

Parameter	Well(s)
Lab - specific conductivity	GW-13, -15A, -15B
Bicarbonate as CaCO ₃	GW-12, -13
Total cations*	GW-15A, -15B
Total anions*	GW-15A
Dissolved Ca	GW- 9B, -15A, -15B
Dissolved Mg	GW- 9B, -15A, -15B
Total hardness	GW- 12, -15A, -15B
TDS	GW-15A, -15B
Field pH	GW-12, -13
Dissolved Na	GW- 9B, -13, -15B
Sulfate	GW-15B
Cl	GW-12, -15B

UPDES YES NO

5. Did the Permittee make a timely submittal of all data, including initially missing or irregular data, and satisfactorily explain irregular data? YES NO

Analysis results for BETX, naphthalene, and propylene glycol have not been reported to the Division.

6. Does the Mine Permittee need to submit more information to fulfill this quarter's monitoring requirements? YES NO

However, beginning next quarter, analysis results for BETX, naphthalene, and propylene

glycol need to be entered into the Division's web site for uploading to the database.

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

According to the monitoring plan in the MRP, the Permittee must report analysis results for benzene, ethylbenzene, toluene, xylene, naphthalene, and propylene glycol for GW-4, GW-5, SW-4, and SW-5 (when there is adequate water to collect a sample, of course). This has not been done for several years. Beginning next quarter, the Permittee needs to enter the analysis results for these parameters into the Division's web site as part of the routine quarterly monitoring. Lab sheets with results of past analyses also need to be provided so the Division can bring the database up to date.

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

None

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