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From: Jim Smith
To: Patrick Collins
Date: 04/24/2007 4:08:55 PM
Subject: Re: BTEX-N and propylene glycol at Wellington

*Outgoing
04/24/2007*

Patrick,

The existing data really should be in the database, so the request for past results still stands.

Your reasons for proposing the removal of these parameters from the monitoring plan appear sound. Submit an amendment to do that - including the reasons and justification for removing them - and, as far as I can see, it should be approvable.

JIM

>>> Patrick Collins <mt.nebo@xmission.com> 04/24/2007 3:56 PM >>>
Hello Jim:

Now that you bring this subject up, I have been meaning to write an amendment for the Wellington property to have these parameters removed from our quarterly sampling regime. I feel this would be justified because I was responsible in the first place for having them added to the parameter list. To provide a brief explanation regarding that statement, Covol was operating a wash plant at the time. During these activities I noticed some areas where small amounts of water was entering the Siaperas Ditch via runoff irrigation or perhaps, Covol's holding ponds. The water could have been coming from either place -- so determined by hydrologists from DOGM and DWQ. So, because NEICO was ultimately responsible for water entering the Price River, we thought it prudent to sample specific areas for BTEX-N and propylene glycol. If detected, we know Covol was probably responsible.

Since Covol has dismantled and removed the wash plant, the ponds are no longer in use for these activities (they have been dry for several years now), and the area has been reclaimed, I think we should now remove the parameters from the sampling regime. Additionally, the past laboratory analyses did not detect BTEX-N or propylene glycol in the samples.

Finally, if such coal washing or similar activities were to resume on the Wellington property, I would again request that the operator sample for these parameters. This would protect the current permittee (NEICO) from liability -- or at least language could be written into any contract for such activities.

My questions to you are:

Do you agree with the proposed change for removal of these parameters for the quarterly sampling regime? If so, do you still want us to provide all the past datasets for DOGM to enter into the database? Or would it be adequate for us to continue to keep them on file as hard copies? (DOGM has always had access to them during our complete inspections). I will await your response.

Thanks to you Jim (and Karla).

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----- Original Message ----- Subject: FW: BTEX-N and propylene glycol at Wellington Date: Tue, 24 Apr 2007 12:00:52 -0600 From: Karla Knoop <kknoop@jbrenv.com> To: 'Patrick Collins' <mt.nebo@xmission.com>

Patrick, See below. Assuming you want to do this, I'll need to get with Jim, because I still don't think it works to enter data from two different labs into the database for a single sample event/site. Also, let me know if you want me to gather the back data or if you'll do that.

Karla-----Original Message-----From: Jim Smith [<mailto:jimsmith@utah.gov>] Sent: Tuesday, April 24, 2007 11:55 AM To: Karla Knoop Subject: RE: BTEX-N and propylene glycol at Wellington

Karla, This is a satisfactory explanation for past practices, but its time to bring things up-to-date. The identification numbers for those six parameters are:

458 toluene	459 ethylbenzene	457 xylene	187 naphthalene
661 propylene glycol	515		

Future quarterly data submissions should include these parameters for the appropriate monitoring sites. Analysis results for these six parameters (generally non-detect) from Dec 1998 to March 2001 are in the database. If you or Patrick would fax, snail-mail, or email copies of the lab reports from March 2001 on, the Division can enter the missing values into the database. Of course, this is not urgent, but I would appreciate receiving the information by the end of this quarter (2nd Qtr) if that is possible.

JIM James D. SMITH [jimsmith@utah.gov] (801) 538-5262 fax (801) 359-3940 >>> "Karla Knoop" <kknoop@jbrenv.com> 04/19/2007 10:40 AM >>> Jim, Those parameters (propylene glycol and BTEX-N) are still being monitored at the Wellington Prep Plant. Lab results are kept on file but not reported in the electronic database. I believe that, originally, there were not parameter numbers assigned to those, so they couldn't be entered electronically, and the requirement with the Division was just to keep the records in the official files. Patrick Collins at Mt. Nebo Scientific maintains those, and they are made available to the Division inspectors for their review. (All reports have been at non-detect levels.) I believe that Dana Dean asked the same question of Patrick last year, and they decided that the existing record keeping was fine. But, you could check with Patrick on that to double-check. I did not include Mike Glasson at Andalex in this reply, because I think it must have been a mistake that he was included in your original email rather than Patrick. (But, then again, maybe you know something I don't!) Hope this clarifies things -- let me or Patrick know if you need more information.

Karla Karla Knoop, Hydrologist, JBR Environmental Consultants, Inc. phone (435) 637-9645 fax (435) 637-8679 kknoop@jbrenv.com -----Original Message-----From: Jim Smith [<mailto:jimsmith@utah.gov>] Sent: Thursday, April 19, 2007 9:59 AM To: kknoop@jbrenv.com Cc: mglasson@andalex.com; Pete Hess Subject: BTEX-N and propylene glycol at Wellington

Karla, According to the monitoring plan in the MRP, in addition to the parameters listed in Tables 7.24-2 and 7.24-5, the Permittee must report analysis results for benzene, toluene, ethylbenzene, 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. Am I missing something in the MRP that has removed these parameters from the monitoring requirements?

JIM James D. SMITH [jimsmith@utah.gov] (801) 538 5262

CC: Karla Knoop; Pete Hess; Priscilla Burton; Tony Garcia; Wayne Hedberg