

WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

November 20, 2008

TO: Internal File

THRU: James D. Smith, Permit Supervisor *DS 11/29/08*

FROM: *AAA* April A. Abate, Environmental Scientist/Hydrologist

RE: 2008 Third Quarter Water Monitoring, Nevada Electric Investment Corporation, Wellington Preparation Plant, C/007/0012, Task ID #2676

The Wellington Preparation Plant is currently in temporary cessation. 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 baseline resampling should be done by fourth quarter 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, and naphthalene (BTEXN) and propylene glycol. Monitoring is done quarterly. All surface water data were reported as within normal ranges.

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 BTEXN and propylene glycol. Monitoring is to be done quarterly.

There was insufficient water to collect a sample for analysis at GW-3, GW-13 and GW-17 during the third quarter 2008.

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 third quarter 2008.

3. Were all required parameters reported for each site?

Streams and Ponds YES NO

SW-3, SW-4, and all the ponds were dry during the third quarter 2008.

Wells YES NO

Static water level was measured but inflow was not sufficient to allow purging and sampling at GW-3, GW-13, and GW-17 during the third quarter 2008.

UPDES YES NO

4. Were any irregularities found in the data?

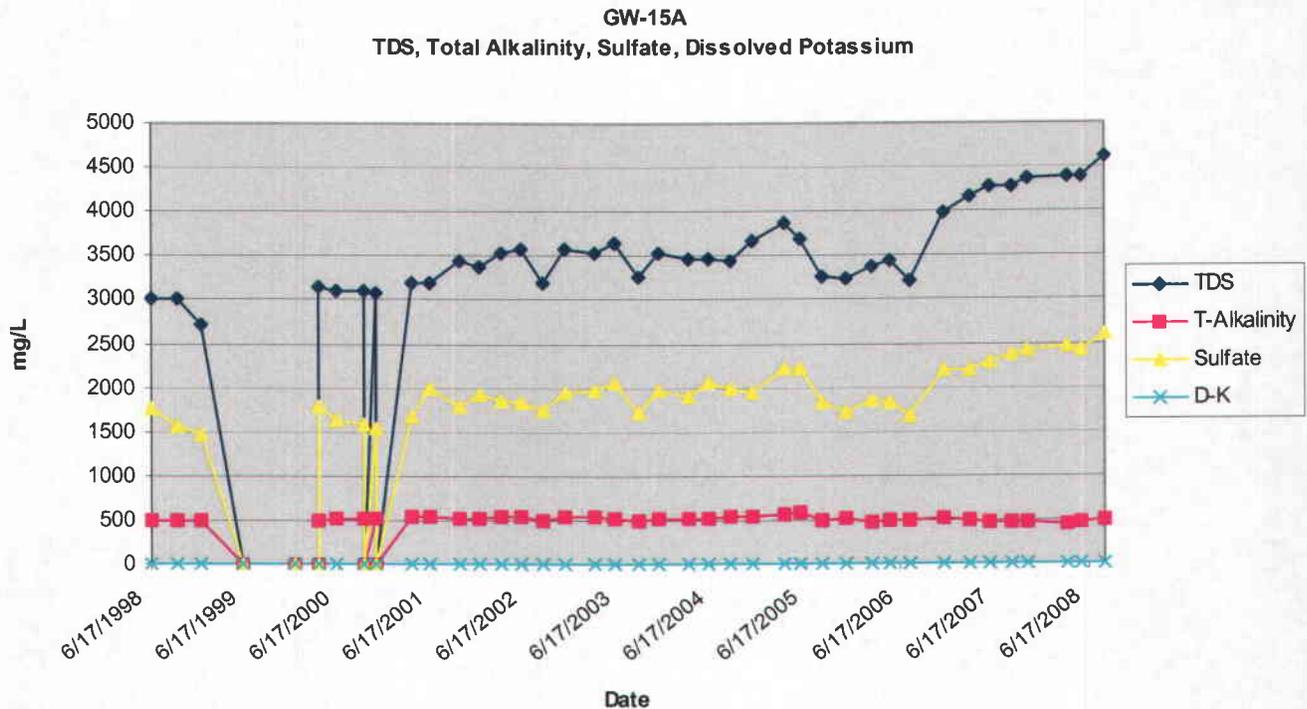
Listed parameters were more than two standard deviations from the mean. An asterisk (*) indicates this is not a parameter specifically required by the MRP.

Streams and Ponds YES NO

Wells YES NO

Parameter	Wells
Field Specific Conductivity	GW-12, GW-15B
Lab specific conductivity	GW-9B
Bicarbonate as CaCO ₃	GW-9B, GW-12
Total hardness	GW-1, GW-15A
Sulfate	GW-15A, GW-15B
Dissolved Ca	GW-15A
Dissolved Na	GW-15A, GW-15B
Dissolved K	GW-15A
Total anions*	GW-15A, GW-15B
Total cations*	GW-15A, GW-15B
TDS	GW-15A
Cl	GW-15B

Several parameters have been outside two standard deviations from the mean at GW-15A and GW-15B. Upward trends for TDS and sulfate are shown in GW-15A (see chart below); data for GW-15B are similar.



UPDES

YES NO

Not Applicable. No discharges were reported from any of the UPDES monitoring locations.

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

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

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

Baseline parameters are to 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 analyses for all baseline parameters need to be done by fourth quarter sampling 2008.

Additionally, based on elevated trends in TDS and other parameters seen in both GW-15A and GW-15B, which are located north of Siaperas Ditch, the Permittee should examine these data more closely to draw conclusions as to the reason for these upward trends in TDS, sulfates and other parameters are present.

8. Follow-up from last quarter, if necessary.
None

O:\007012.WEL\Water Quality\WQ_08-3.doc