

WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

August 11, 2009

TO: Internal File

THRU: James D. Smith, Permit Supervisor *JS 08/12/09*

FROM: April A. Abate, Environmental Scientist II *AAA 8-11-2009*

RE: 2009 Second Quarter Water Monitoring, Nevada Electric Investment Corporation, Wellington Preparation Plant, C/007/0012, Task ID #3315

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 have been collected in the year preceding permit renewal. The upcoming renewal submittal is due 08/10/09 and the next renewal is due 12/10/09.

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

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.

During the second quarter 2009, samples were collected from SW-1 and SW-2A. Flow only was measured from SW-2. None of the other monitoring locations reported flow.

Wells YES NO

The Permittee is required to analyze samples quarterly 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.

Wells GW-3, GW-13 and GW-17 were gauged but not sampled. Based on the historical groundwater yields from these wells, there is an insufficient amount of water to collect samples.

UPDES YES NO

Six UPDES permitted outfalls at the Wellington Preparation Plant are monitored monthly: #UTG040010-003, 004, 005, 006, 007, and 008. None of the UPDES sites reported flow during the second quarter 2009.

3. Were all required parameters reported for each site?

Streams and Ponds YES NO

Wells YES NO

UPDES YES NO

Not applicable.

4. Were any irregularities found in the data?

Streams and Ponds YES NO

In SW-1, the Price River sample collected above the Prep Plant, total suspended solids (TSS) was elevated in both surface water samples SW-1 and SW-2A detected at concentrations of 1,810 parts per million (ppm) and 1,914 ppm, respectively. Total Dissolved Solids (TDS) concentrations in the surface water samples were much lower than the previous quarter's concentrations. Additionally, oil and grease was not detected in SW-1 this quarter, whereas a concentration of 6 ppm was detected in this sample during the previous quarter. Total iron concentrations were higher than normal in the surface water samples during this quarter (refer to Chart 1).

Wells

YES NO

Total iron concentrations were lower in some of the groundwater samples from last quarter but spiked in GW-1. All other parameters appeared to be within their historical normal ranges. Chart 1 shows the total iron concentrations during the June 2009 sampling event for all select monitoring wells.

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?

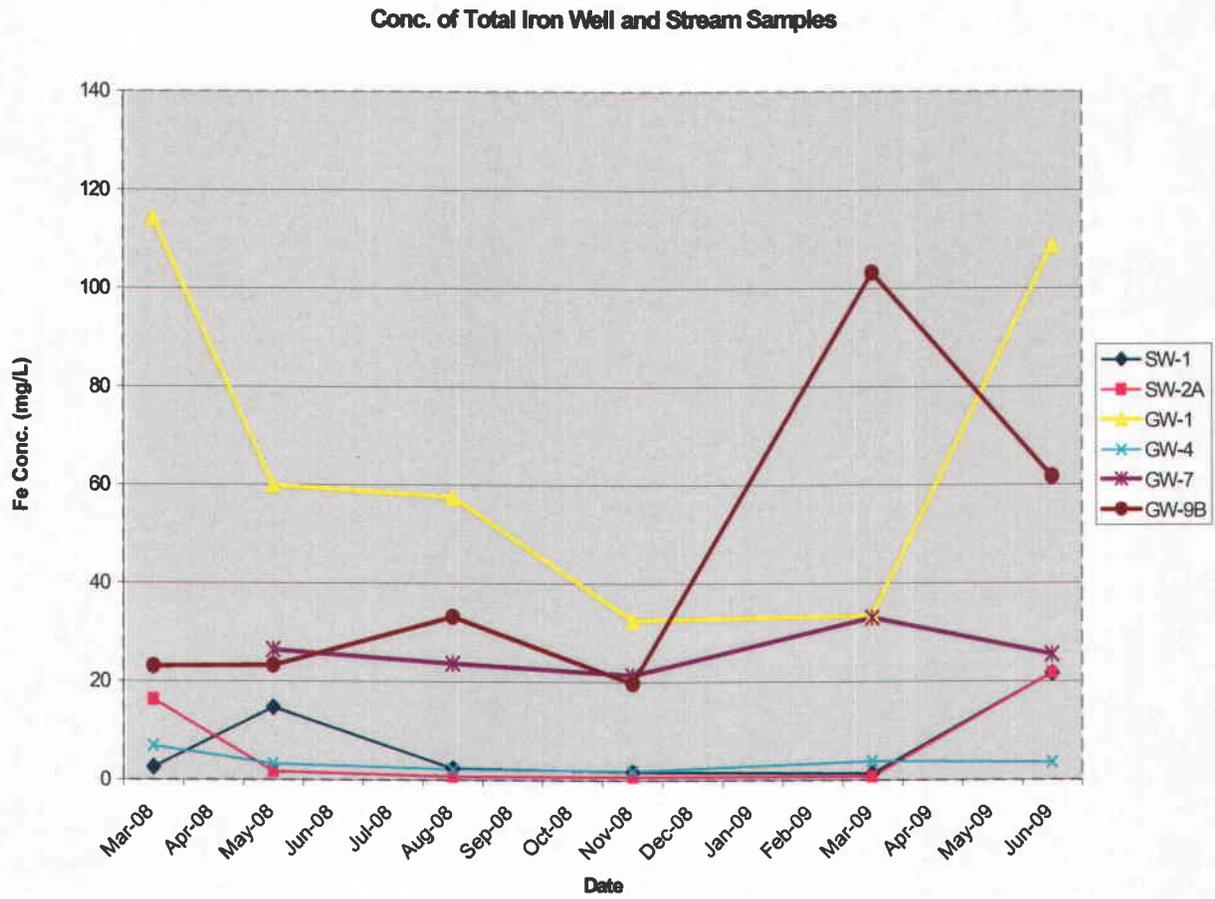
- Total iron levels appear to be elevated in most of the groundwater monitoring wells at the site. Total iron concentrations for most of the wells were in line with previous results for each respective well. Surface water samples were also slightly elevated. Surface water samples collected during the second quarter and select groundwater samples are shown on Chart 1.

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

Spikes in total iron were shown in monitoring well MW-9B and MW-15A during the first quarter 2009. Second quarter 2009 sampling results for total iron in these wells did show a decrease. However, GW-1 showed an increase in total iron. The pattern of total iron flowing through the surface and groundwater in the permit area appears to be very dynamic. No state-mandated numeric groundwater or surface water standards exist for total iron. A total iron standard is in place for the Wellington UPDES discharge permit for all discharge monitoring points at a limit of 1.0 mg/L.

Dissolved Aluminum concentrations were noted as elevated in select groundwater samples during the first quarter 2009 monitoring. The Permittee's consultant reran the samples at the laboratory since the samples were still within allowable holding times. The rerun samples results were non-detect for aluminum.

Chart 1.



O:\007012.WEL\Water Quality\Q2_09 wqreport.doc