

WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

April 14, 2010

TO: Internal File

THRU: James D. Smith, Permit Supervisor

FROM: April A. Abate, Environmental Scientist II *AAA 4-15-2010*

RE: 2009 Third Quarter Water Monitoring, Nevada Electric Investment Corporation, Wellington Preparation Plant, C/007/0012, Task ID #3394

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 are collected in the year preceding permit renewal. The permit for the Wellington Preparation Plant was renewed on November 30, 2009.

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 third 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 was 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 third quarter 2009.

3. Were all required parameters reported for each site?

Streams and Ponds YES NO

Wells YES NO

UPDES YES NO

Not applicable.

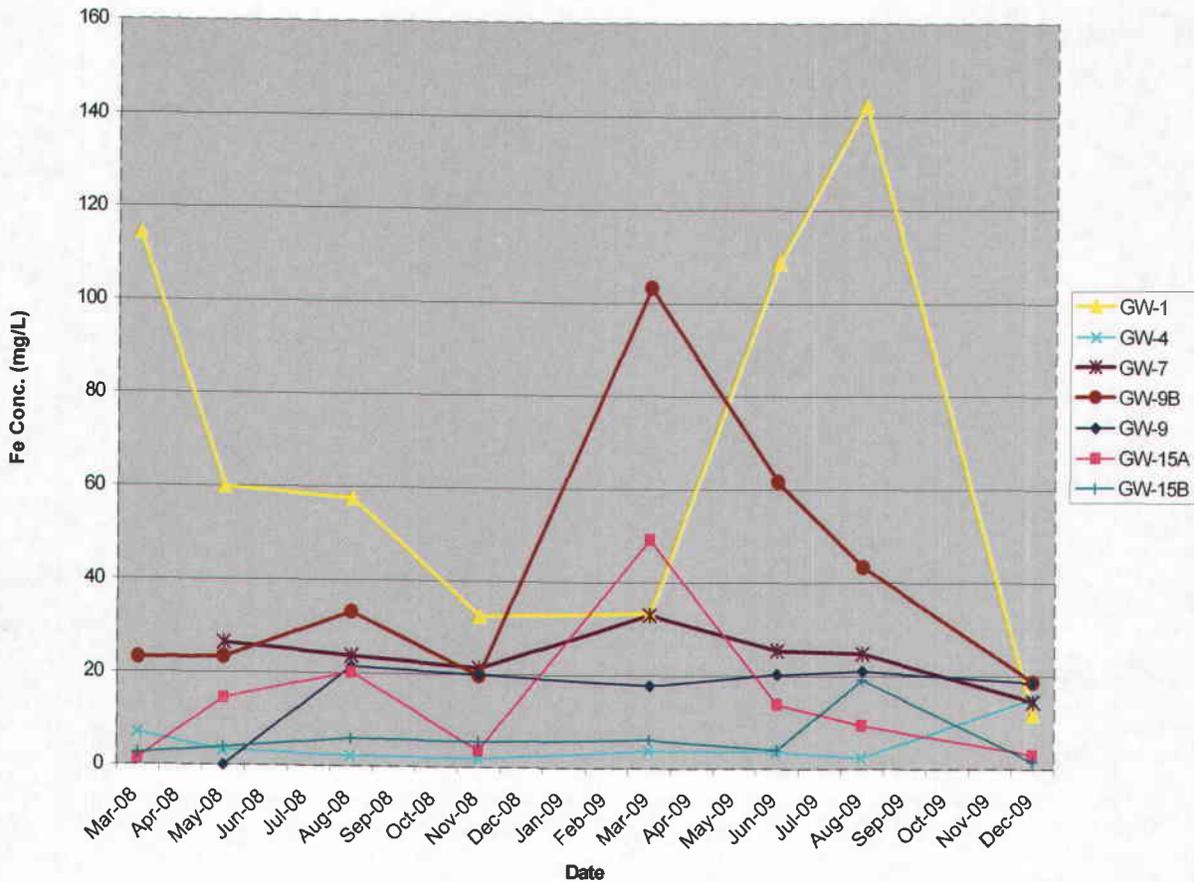
4. Were any irregularities found in the data?

Streams and Ponds YES NO

Wells YES NO

The total iron concentration spiked in monitoring well GW-1 during the third quarter showing a sample concentration of 142.47 ppm – in contrast to the other wells which were all below 43 ppm this quarter. All other parameters appeared to be within their historical normal ranges. Chart 1 shown on the following page illustrates the total iron concentrations for sampling events up through the end of 2009 for all monitoring wells.

Conc. of Total Iron Well Samples



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?

- Monitor total iron levels in groundwater.

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

Surface water samples SW-1 and SW-2A detected total iron at concentrations of 1,810 parts per million (ppm) and 1,914 ppm, respectively during second quarter 2009. Third quarter concentrations were down considerably to 1.25 ppm at SW-1 and SW-2A at 1.32 ppm. 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.