

#3926
R

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

October 18, 2011

TO: Internal File

THRU: Daron Haddock, Permit Supervisor 

FROM: April A. Abate, Environmental Scientist III 

RE: Water Monitoring Revisions, Utah American Energy, Inc., Horse Canyon - Lila Canyon Mine, Permit #C/007/0013, Task ID #3926

SUMMARY:

On May 3, 2011, the Division initially received an amendment to temporarily cease monitoring at most surface and ground water sites, with the commitment to resume monitoring two years before anticipated second mining applying to several groundwater and surface water monitoring locations listed in their approved Mining and Reclamation Plan (MRP).

The Division found the amendment deficient under Task #3867 based on some minor discrepancies listed in the water monitoring protocols on Table 7-3 in the MRP. On September 23, 2011, the Permittee submitted a response clarifying and making the corrections to the water monitoring discrepancies identified by the Division.

The following deficiencies were addressed by the Permittee:

[R645-301-731.200]: The technical memo issued by Jim Smith on June 7, 2011 indicated that L-19-S will remain active to monitor Little Park Wash at the permit boundary. The resubmitted Table 7-3 indicates that L-19-S will be temporarily suspended from the monitoring plan. The Permittee needs to resolve this discrepancy and confirm whether or not L-19-S is intended for temporary suspension from the water monitoring plan. Plate 7-4 also shows this monitoring location as inactive.

Division Response: The Permittee has clarified that location L-19-S is intended for temporary suspension until two years prior to the start of second mining (consistent with several other surface-ephemeral sample locations listed on Table 7-3). L-19-S represents an ephemeral wash that is subject to intermittent flow as a result of flash flood activity. This site has been monitored on a quarterly basis since 2007 with no reported flow or analytical data from this location.

TECHNICAL MEMO

[R645-301-731.200]: Another discrepancy was identified on page 58 of the MRP text states that L-15-S is a permanently suspended location as of 1st quarter 2003 on Table 7-3. However, the Division water database shows that a no flow monitoring event was recorded in 2009. Furthermore, the language on page 58 implies that baseline parameters were collected for two years at this location along with L-13-S, L-14-S, and L-18-S and each of these locations are to be temporarily suspended. The Permittee needs to clarify the status of L-15-S and update table 7-3 if necessary.

Division Response: The Permittee has clarified that L-15-S is a location that been permanently suspended as of 2003. The Permittee has acknowledged that the data submitted in the water database for location L15-S was an error and no additional data will be added to the database for sites that are not part of the current monitoring plan. The Permittee has requested that reporting data be removed from the Division database post-2003 for this sampling location.

RECOMMENDATIONS:

Corrections to the database and the master commitment list have been made. The amendment is recommended for approval.