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DIVISION OF OIL, GAS AND MINING

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TO: Internal File

FROM: Gregg A. Galecki, Reclamation Hydrologist *GA*

RE: Amendment to Water Monitoring Plan, Savage Industries, Inc., Savage Coal Terminal, C/007/022-AM02E

SUMMARY:

On November 14, 2002, the Division received a proposed amendment to the Savage Coal Terminal Water Monitoring Program. The proposal was submitted to abate a potential violation for not conducting the typical bi-annual water monitoring at the Savage Coal Terminal. The function of the changes to the water monitoring plan is to eliminate any possibility of confusion of what is expected with a 'bi-annual' sampling frequency. The following technical review evaluates the proposed amendment from a hydrologic prospective only. The amendment meets the minimum requirements of the State regulation.

TECHNICAL ANALYSIS:

OPERATION PLAN

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, 301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

Analysis:

Groundwater monitoring

A review of the water monitoring history for site CV-1W since 1988 indicates the 'bi-annual sampling was conducted both in the 2nd and 4th quarters with only two exceptions.

TECHNICAL MEMO

It wasn't sampled in 1999 (no explanation), and the 2nd quarter of 2002. To avoid any confusion and misinterpretation of the monitoring plan on the Operator's part, the Division requested a modification to the water-monitoring plan. The modification clearly indicates sampling will be conducted in the 2nd and 4th quarters in text on pages 7-56, 7-91, and 7-93. No additional modifications are necessary at this time.

Findings:

Information in the application adequately addresses the requirements of the Operation Plan - Hydrologic Information section of the Regulations.

RECOMMENDATION:

The amendment can be accepted in its present form.