

## OGMCOAL - Savage Coal Terminal 1st Quarter 2010 Water Quality Report

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**From:** April Abate  
**To:** Dan Guy; OGMCOAL@utah.gov  
**Date:** 10/14/2010 10:53 AM  
**Subject:** Savage Coal Terminal 1st Quarter 2010 Water Quality Report  
**Attachments:** 09302010.pdf; April Abate.vcf

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Hello Dan,

Here is the water quality report for the first quarter that noted the oil and grease detection. Based on our recent telephone conversation, the Division acknowledges that the 3rd quarter groundwater sample from well S-2-GW did not show any oil and grease above detection limits in the water sample.

Best regards,

April

**April A. Abate**

*Environmental Scientist II*

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# WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

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September 30, 2010

TO: Internal File

THRU: James D. Smith, Permit Supervisor *JDS 04 Oct 2010*

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

RE: 2010 1st Quarter Water Monitoring, Savage Services Corporation, Savage Coal Terminal, C/007/0022 Task #3481

The Savage Coal Terminal is an operating coal loadout where coal is crushed, screened, blended, and then loaded onto rail transport. The operation was restarted in 2006 after several years of being in cessation.

Pertinent water monitoring requirement information is in the MRP in Section 731.200.

1. **Was data submitted for all of the MRP required sites?** YES  NO

## Springs –

The Permittee is not required to monitor any springs at the Savage Coal Terminal. There are no springs to monitor at the Savage coal terminal site.

## Streams –

Stream site CV-14-W was not monitored during the 1st quarter of 2010. The Permittee is required to sample CV-14-W in the second and fourth quarter of each year.

No reporting was required for stream site CV-14-W this quarter.

## Wells–

There are three groundwater monitoring wells at the site: S-1-GW, S-2-GW, and CV-1-W. Monitoring well S-1-GW was dry.

As of 1<sup>st</sup> quarter 2010, the MRP states that all wells will be monitored during the second

and forth quarter only. However, it appears that the operator monitored wells S-1-GW, S-2-GW on March 25, 2010 during the 1<sup>st</sup> quarter of 2010. Only S-2-GW had a detection of groundwater. Laboratory and field analytical parameters were collected on this sample collected on March 25, 2010.

**UPDES**

There is one active UPDES outfall at the Savage Coal Terminal, CV-15-W, or UTG040005-001. The Permittee is required to monitor this UPDES site monthly under Permit # UTG040005 that is due to expire on April 13, 2013.

The location was monitored monthly during the 1st quarter. The Permittee recorded no flow at the UPDES point during the period.

2. **Were all required parameters reported for each site?** YES [X] NO [ ]
3. **Were any irregularities found in the data?** YES [X] NO [ ]

Data from groundwater monitoring well S-2-GW indicate that oil and grease (O&G) has been detected at a concentration of 5 milligrams per liter (mg/L). O&G was previously detected in a groundwater sample from this well at a concentration of 9 ppm reported in February 2007. O&G data were also available for 2<sup>nd</sup> quarter reporting a concentration of 10 mg/L indicating that there is an elevated trend in oil and grease.

Data shown below are reported from groundwater sample S-2-GW did not pass the following standard water quality reliability checks:

Reliability Check	Acceptable Range	S-2-GW Values
Cation/Anion Balance	<5%	8%
TDS/Conductivity	>0.55 - <0.75	1.49
Conductivity/Cations	>90 - <110	45.31

This does not mean that something is wrong, just that there may be something unusual in the water chemistry of the sample collected.

4. **On what date does the MRP require a five-year re-sampling of baseline water data.**

The permit renewal was issued on August 6, 2010. Currently there is no specified baseline sampling protocol established in the MRP for the groundwater monitoring wells.

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

The oil and grease detected in groundwater monitoring well S-2-GW should be further investigated to determine the source. The Division recommends working with the analytical laboratory to determine an appropriate laboratory analytical method for testing the groundwater to determine the chemical nature of the oil and grease (i.e. diesel fuel, gasoline). The Division also recommends that appropriate investigation and remediation measures be undertaken to determine if there has been a spill of petroleum hydrocarbons that has occurred at the site. In addition, this well should be sampled quarterly until concentrations of oil and grease decrease to non-detectable levels. Furthermore, the Division recommends that the table listed on page 80 of the MRP be updated to reflect an updated sampling frequency at all applicable groundwater monitoring wells.

Currently, the water monitoring plan in the MRP does not have a 5-year commitment to sample baseline parameters. A list of baseline parameters to be sampled on a 5-year basis is a recommended update to Section 731.200 of the MRP.