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OGMCOAL - First Quarter 2011 Water Quality Report - Savage Services Corporation

From: April Abate
To: garthnielsen@savageservices.com
Date: 9/6/2011 4:58 PM
Subject: First Quarter 2011 Water Quality Report - Savage Services Corporation
CC: OGMCOAL@utah.gov; Pete Hess
Attachments: 08302011.pdf; April Abate.vcf

Dear Mr. Nielsen,

Attached please find the above water quality report for the 1st quarter of 2011. I have observed a trend with oil and grease detections at your groundwater monitoring well closest to the refuse pile that needs to be investigated further (please see the report for further information). Could you please give me a call to discuss some of the options that I laid out in my report? I am concerned that you may have a groundwater pollution problem. This is an important matter that requires our attention.

Thanks very much.

Regards,

April

April A. Abate

Environmental Scientist III

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Starting Tuesday, September 6, 2011, our agency hours will be 8am-5pm, Monday-Friday.

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WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

August 30, 2011

TO: Internal File

THRU: Steve Christensen, Permit Supervisor

FROM: April A. Abate, Environmental Scientist III *aaa 8/31/2011*

RE: Terminal, C/007/0022, Task #3757

The Savage Coal Terminal is an operating coal loadout where coal is crushed, screened, blended, and then loaded onto rail transport. 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 is required to be monitored during the 2nd and 4th quarters of each year.

CV-14-W was not sampled during the 1st quarter of 2011.

Wells–

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

As of 4th quarter 2010, the MRP states that wells S-1-GW, S-2-GW will be monitored bi-annually. Groundwater monitoring wells S-1-GW and S-2-GW were monitored on February 23, 2011. CV-1-W is required to be monitored during the 2nd and 4th quarters of each year.

Well S-1-GW was reported as dry.

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.

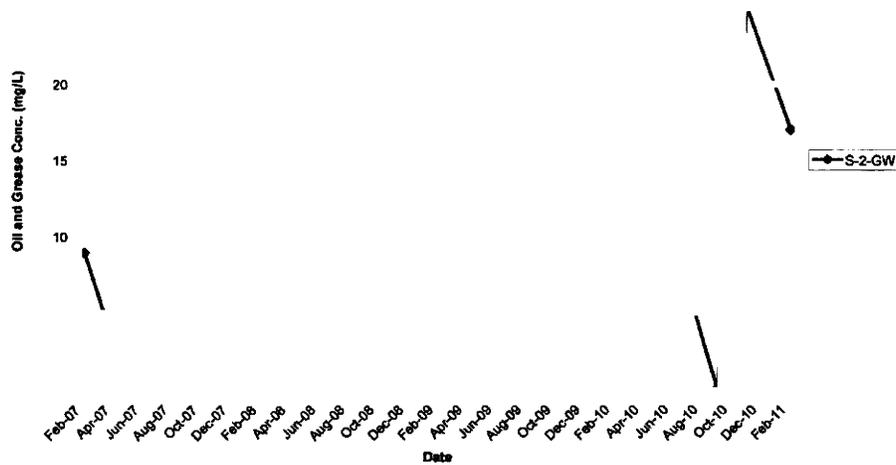
The location was monitored monthly during the 1st quarter 2011. The Permittee recorded no flow at the UPDES point during the period.

2. Were all required parameters reported for each site? YES [X] NO []

3. Were any irregularities found in the data? YES [X] NO []

Oil and grease has been detected in groundwater monitoring well S-2-GW on a somewhat sporadic basis but in significant concentrations.

Groundwater Monitoring Well S-2-GW



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. The permittee has committed to collecting baseline samples once every 5 years. The next scheduled baseline sampling is 4th quarter of 2013.

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

The source of the oil and grease detection in the groundwater samples collected from S-2-GW should be further investigated. The UPDES limit for oil and grease at the permitted outfall is listed at 10 mg/L. Although this standard does not apply to groundwater, it can be used as an indicator of water quality issues that should be investigated at and near this well. The past two quarters of data have shown oil and grease concentrations at 25 mg/L and 17 mg/L, respectively. The Permittee should consult with their UPDES permit administrator and discuss the oil and grease conditions at this well. The Permittee may also want to consult with the lab to see if further analysis of oil and grease sample could be performed to determine the source of the hydrocarbons. Additional groundwater assessment studies may be necessary.