

# WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

---

June 15, 2004

TO: Internal File

THRU: Daron R. Haddock, Permit Supervisor *DRH*

FROM: James D. Smith, Senior Environmental Scientist *JS*

RE: 2004 First Quarter Water Monitoring, Andalex Resources, Inc., Wildcat Loadout, C/007/0033-WQ04-1, Task ID#1937

- 1. Were data submitted for all of the MRP required sites?** YES  NO   
*Identify sites not monitored and reason why, if known:*

There was no reported flow at MRP monitoring points WCW-1, WCW-2, WCW-3, and WCW-4 during the first quarter of 2004.

- 2. On what date does the MRP require a five-year resampling of baseline water data.**  
*See Technical Directive 004 for baseline resampling requirements. Consider the five-year baseline resubmittal when responding to question one above. Indicate if the MRP does not have such a requirement.*

### Resampling Due Date

In the year preceding renewal, one sample at low flow and one at high flow for baseline analyses. Renewal submittal due 01/05/04, renewal due 05/05/04. Only one sample was collected in 2003, at WCW-1 in March, and; it was not analyzed for baseline parameters.

- 3. Were all required parameters reported for each site?** YES  NO   
 Comments, including identity of monitoring site:

No flow at all sites.

4. **Were irregularities found in the data?** YES [ ] NO [X]  
*Comments, including identity of monitoring site*

5. **Were DMR data submitted for all required sites?**

1<sup>st</sup> month, YES [X] NO [ ]  
2<sup>nd</sup> month, YES [X] NO [ ]  
*Identify sites and months not monitored:* 3<sup>rd</sup> month, YES [X] NO [ ]

DMR data were submitted electronically. There was no UPDES discharge during the first quarter.

6. **Were all required DMR parameters reported?** YES [X] NO [ ]  
*Comments, including identity of monitoring site:*

There was no UPDES discharge during the first quarter.

7. **Were irregularities found in the DMR data?** YES [ ] NO [X]  
*Comments, including identity of monitoring site:*

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

The one sample collected last year, March 2003 at WCW-1, should have been analyzed for baseline parameters for the 2004 permit renewal. Because of the sparsity of flow events at this loadout, this single flow was both the high- and low-flow event for the entire site. The monitoring plan should probably be clarified so that any flow during the year preceding permit renewal would be analyzed for baseline parameters.