

WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

January 30, 2004

TO: Internal File

THRU: Daron R. Haddock, Permit Supervisor

FROM: Dana Dean, P.E., Senior Reclamation Hydrologist

RE: 2003 Fourth Quarter Water Monitoring, Sunnyside Cogeneration Association, Sunnyside Refuse/Slurry, C/007/0035-WQ03-4, Task ID #1812

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

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

The MRP states that "once every five years (prior to each application for permit renewal) one sample from each of the monitoring sites listed in Table 7-2A will be sampled and analyzed for the parameters listed in Table 7-2B". *The Permittee last sampled for baseline during the third quarter of 1997. They should have sampled baseline again in 2002, but due to a misunderstanding did not. They should sample for baseline during the next sampling period, and then will be required to again in 2007.*

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

4. Were irregularities found in the data? YES NO
Comments, including identity of monitoring site:

Site CRB had three parameters outside of two standard deviations from the mean. They were:

PARAMETER	VALUE	DEVIATIONS FROM MEAN	MEAN
Specific Conductivity	5610 µmhos/cm	2.50	5023.89 µmhos/cm
Total Anions	86.4 meq/l	2.54	72.11 meq/l
Dissolved Magnesium	371 mg/l	2.31	299.19 mg/l

This is the second quarter in a row that conductivity is outside the 2 standard deviation range, but the average is already quite high. There is a good correlation between conductivity and TDS, however TDS/Conductivity should be between 0.55 and 0.76; the values for this site range between 0.91 and 1.11.

This is the third quarter in a row that dissolved Magnesium is outside the 2 standard deviation range, however it is lower than last quarter and the average is already high.

5. Were DMR forms submitted for all required sites?

1st month, YES NO
 2nd month, YES NO
 3rd month, YES NO

All DMR's reported "No Flow".

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

All DMR's reported "No Flow".

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

All DMR's reported "No Flow".

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

The Permittee last sampled for baseline during the third quarter of 1997. They should have sampled baseline again in 2002, but due to a misunderstanding did not. They should sample for baseline during the next sampling period. The inspector should follow up and make sure that baseline sampling takes place during the first quarter of 2004, where possible.

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