

WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

September 18th, 2018

TO: Internal File

THRU: Daron Haddock, Coal Program Manager

FROM: Steve Christensen, Environmental Scientist



RE: 2018 1st Quarter Water Monitoring, Canyon Fuel Company (CFC), LLC, Dugout Mine, C/007/0039-WQ18-1, Task ID #5705

The Dugout Canyon Mine is currently operational in the Book Cliff Mountain range of Carbon County, UT. Water monitoring data is submitted quarterly to the Division EDI database. Beginning on page 7-40 of the approved Mining and Reclamation Plan (MRP), water monitoring protocols and sampling requirements are provided for surface water, ground water, monitoring wells and Utah Pollutant Discharge Elimination System (UPDES) outfalls. Tables 7-4 and Table 7-5 list the individual monitoring sites and their sampling protocols for ground water and surface water respectively.

1. Was data submitted for all required sites?

Springs YES [X] NO []

The approved MRP outlines the operational and post-mining monitoring of ten springs (203, 259A, 260, 321, 324, SC-100, SC-116, SC-14, SC-65 and SP-200) and one groundwater discharge site (MD-1). The locations of these springs are depicted on Plate 7-1, Hydrologic Monitoring Stations. MD-1 provides monitoring data for groundwater discharge from the old Gilson coal seam workings.

None of the spring monitoring sites could be accessed due snow and ice conditions. Site MD-1 recorded no observable flow.

Streams YES [X] NO []

The approved MRP outlines the monitoring of ten stream sites (DC-1, DC-2, DC-3, DC-4, DC-5, FAN, PC-1A, PC-2, PC-3 and RC-1). Sites DC-4 and DC-5 are sampled during the first wet or dry year as conditions permit. The locations of these streams are depicted on Plate 7-1, Hydrologic Monitoring Stations.

Stream monitoring sites Fan, PC-1A, PC-2 and PC-3 could not be accessed this quarter due to snow and ice conditions. Monitoring sites DC-1, DC-3, RC-1, SS-1 and SS-2 reported no observable flow.

Stream monitoring site DC-2 was the only monitoring site that could be accessed and produced a measurable flow.

Wells **YES [X] NO []**

The approved MRP outlines the sampling of three monitoring wells (GW-10-2, GW-11-2 and GW-24-1). However, monitoring wells GW 11-2 and GW 24-1 can no longer be monitored. Table 7-4 and Section 731.200 of the MRP specify that the Permittee will obtain quarterly water level measurements from the wells.

Monitoring well GW-24-1 became blocked during the winter of 2000 and was last sampled in September of 1998. The well was removed from monitoring after the 4th quarter of 2004. Monitoring well G-11-2 was last monitored in October 2007. Since that time, the Permittee has reported that the well has appeared to have “caved in”. Monitoring well GW-10-2 is still functioning and actively monitored for water level.

Though not required by the approved MRP, three additional monitoring wells (DH-1, DH-2 and DH-3) are monitored at the waste rock disposal site. Water levels are monitored quarterly with additional water quality sampling obtained from DH-1 during low flow periods (i.e. 3rd or 4th quarter).

Depths were recorded for wells DH-1, DH-2, DH-3 and GW10-2. Monitoring well GW10-2 could not be accessed.

UPDES **YES [X] NO []**

Operational monitoring is required monthly for seven active UPDES outfalls (Permit No. UT0025593):

- **001**-Mine water discharge to Dugout Ck.,
- **002**-Sedimentation pond discharge to Dugout Ck. (disturbed area runoff),
- **003**-Storage water discharge to Dugout Ck. (30,000-gallon water tank discharge),
- **004**-Sedimentation pond (waste rock site) discharge to Grassy Trail Ck. Tributary,
- **005**-Pace Canyon fan portal breakout, mine water discharge to Pace Ck.
- **006**-Sediment trap culvert discharge to Pace Creek (disturbed area runoff from Pace Canyon Fan facility).
- **007**- Sedimentation pond (waste rock site) discharge to an unknown tributary of Grassy Trail Creek.

Specific effluent limitations and self-monitoring requirements as outlined in the UPDES permit are presented below:

Effluent Characteristics	Effluent Limitations
TDS, tons/day	1.0
Total Suspended Solids (TSS), ppm	70
Total Iron, ppm	1.1
Oil & Grease, ppm	10
Total Dissolved Solids (TDS), ppm	2,400
pH	9

3,000 parts per million (ppm) is the water quality standard for total dissolved solids (as established by the Department of Water Quality) for both Pace Creek and Dugout Creek.

UPDES outfall 005 produced a discharge this quarter.

2. Were all required parameters reported for each site?

Springs YES NO

All of the spring monitoring sites were either inaccessible or did not produce a measurable flow.

Streams YES NO

Stream monitoring site DC-2 was the only site that produced a measurable flow. All required parameters were submitted.

Wells YES NO

UPDES YES NO

Of the UPDES sites that reported a discharge this quarter (005) all required parameters were reported.

3. Were irregularities found in the data?

Springs YES NO

Streams YES NO

DC-2: Total alkalinity and bicarbonate.

Wells YES [X] NO [X]

UPDES YES [] NO [X]

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

The resampling of baseline data will next be performed in July 2019. In addition, one water sample will be collected at each spring sampling point during low flow period every fifth year, during the year, preceding re-permitting. These samples will be obtained for the analysis of baseline parameters (See Table 7-4).

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

All of the required fourth quarter 2017 data had not been submitted for stream monitoring site PC-3. The Permittee was notified and they subsequently provided the missing water quality data. The data had been collected, but had been inadvertently missed.

The Permittee should submit an amendment to the Dugout Canyon Mine Mining and Reclamation Plan (MRP) to revise Table 7-4, Groundwater Monitoring Program. Monitoring wells GW-10-2 and GW-11-2 can no longer be monitored. The Permittee must provide some justification for why these monitoring wells should not be replaced.