0033

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PACIFICORP
POWER SUPPLY

July 9, 1992

RECEIVED
JUL 20 1992
DIVISION OF
OIL GAS & MINING

Ms. Pamela Grubaugh-Littig
Permit Supervisor
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

RE: WASTE ROCK AND SEDIMENT POND WASTE ANALYSIS, QUALITY ASSURANCE/QUALITY CONTROL PROGRAM, PACIFICORP, COTTONWOOD AND DEER CREEK MINES

Dear Ms. Grubaugh-Littig:

In response to your January 14, 1992 correspondence concerning problems with analytical consistency and methodologies, the following is submitted:

1. PacifiCorp has observed the potential concerns and has selected laboratories which have better reputations and deal more with soil testing. The laboratory which has been used recently for samples is ACZ Laboratories.

2. In discussion with Henry Sauer, DOGM Reclamation Soils Specialist, it was concluded that the methods used by ACZ be reviewed to determine if they were in accordance with the ***DOGM Guidelines For Management Of Topsoil And Overburden.*** Attached is a PacifiCorp requested letter from ACZ Laboratories' Ralph V. Poulsen reviewing the Division Guidelines. The lab states that they are aware of the guidelines, use the methods with the guidelines routinely and continue to use the suggested methods, with the exception of total sulfur.

3. PacifiCorp is willing to meet with DOGM to review the Division Guidelines and suggested methods.

4. Quality assurance/quality control will continue to be handled by requesting the selected laboratory follow the currently suggested DOGM Guideline methods.

Questions can be directed to Guy Davis at 653-2312.

Sincerely,

Val Payne
Sr. Environmental Engineer

GD/dw

cc: J. Blake Webster

ACZ Laboratories, Inc.

30400 Downhill Drive
Steamboat Springs, CO 80487
(303) 879-6590 (800) 334-5493
FAX No. (303) 879-2216

June 25, 1992

Mr. Guy Davis
PACIFICORP
One Utah Center
201 South Main, Suite 2100
Salt Lake City, Utah 84140

Re: Request for Statement of Qualifications

Dear Mr. Davis,

This letter is in response to a letter you wrote to Mr. Frank Polniak of ACZ Laboratories on March 27th. I apologize for the delay in sending a reply. Mr. Polniak received the letter while on vacation. The letter was forwarded to me. Apparently I misfiled your letter during this period. I recently found the letter and determined that no response had been sent out to you.

I am familiar with the Utah DOGM Guidelines for Management of Topsoil and Overburden. These guidelines were presented to me by Mr. Leatherwood before being published so that I could review and compare the required analytical methods with those requested by other state agencies. The methods listed in the DOGM regulations are standardized methods used by nearly all of the states in the Rocky Mountain region. ACZ Laboratories, Inc. has routinely provided these analyses for numerous Western coal mines since 1980. These methods are still in force and no new replacement methods have been adopted in recent years.

For the most part, the soil methods listed in the DOGM guidelines are applicable to coarse refuse material. The main problem associated with analyzing this type of material is in the initial sample preparation step. Coarse material samples requiring air-drying and grinding of the sample to minus 10 mesh. Failure to grind the sample to this sieve size or grinding using a device which contaminates the samples can cause severe precision and accuracy problems. There has been some discussion over the years whether or not particle size analyses on ground overburden and waste rock is applicable.

All of the methods used by ACZ Laboratories, Inc. are performed according to the suggested methods except for total sulfur. ACZ Laboratories uses the ASTM D3177, Eschka Method in place of the LECO sulfur analyzer. This is the original method used prior to the introduction of the sulfur analyzer systems. It was used as the control method to determine the accuracy and precision of the LECO sulfur analyzer method when it was first developed. To insure accuracy of the Eschka method, ACZ analyzes NBS Standard Reference Sediment Samples and internal QC samples which have been verified by an outside laboratory using the LECO Sulfur analyzer. We have also had numerous samples over the years analyzed by both methods with excellent correlation between data. ACZ's use of the Eschka method was brought to the attention of DOGM during the initial review of their suggested analytical methodology. Utah accepted is use since it does provide equivalent results to the LECO method.

ACZ Laboratories, Inc.

June 25, 1992

Mr. Guy Davis
PACIFICORP
Re: Request for Statement of Qualifications

I am enclosing a Statement of Qualifications (SOQ) for your review. ACZ Laboratories, Inc. has been providing analytical services for the mining and petro-chem industries, environmental consultants, and government agencies since 1980. We have a staff of 40 professional chemists, technicians, and support personnel performing a wide range of inorganic, organic, and radio-chemical analyses for clients throughout the United States.

ACZ strives to provide clients with high quality data and personal service at competitive prices. As a service to our clients, we provide sample containers, chain-of-custody forms, labels and coolers shipped to the client (office or sampling location) by regular UPS at no additional charge. Turn-around times will vary with the type and number of analyses, but routinely are two weeks for full suite inorganic water analyses to three to four weeks for inorganic soil, organic and radio-chemical analyses.

We would like to work with you on any up coming projects. If you have any questions or need future information please call me using our toll-free number of (800) 334-5493.

Sincerely,

Ralph V. Poulsen

Ralph V. Poulsen
Vice President