

# WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

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February 3, 2004

TO: Internal File

THRU: Daron R. Haddock, Permit Supervisor

FROM: James D. Smith, Senior Reclamation Specialist

RE: 2003 Third Quarter Water Monitoring, Energy West Mining Company, Deer Creek Mine, C/015/0018-WQ03-3, Task ID #1740

**1. Were 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

Renewal submittal due 10/07/00, renewal due 2/07/01. Baseline analyses were performed in 1996 and 2001 and will be repeated every 5 years, i.e., next baseline analyses will be in 2006.

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

There are no 3rd Qtr. field pH or field specific conductivity values for:

EM Pond	MF-10	MFR-10	SP1-26
Grant Spg.	MF-19B	MFR-30	SP1-29
JV-34	MF-213	RR-15	UJV-101
JV-9	MF-219	RR-23A	UJV-206
Little Bear Spg.	MF-7	RR-5	

The Permittee stated in an e-mail dated January 12, 2004 that “Because of the expanse of the spring locations, we divide into 4 groups and hike to the springs. We do not have enough quality meters to give to everyone. However, lab results of pH and Conductivity are noted on the lab sheet.”

Values for conductivity and pH measured in the lab can vary significantly from those measured in the field, and the monitoring plan calls for field determination of these parameters. Lab measurements of pH and conductivity can provide back-up information if there are problems collecting the data in the field, such as a malfunctioning meter. However, to deliberately go to the field without adequate equipment is unacceptable. The Permittee received NOV N04-39-1-1 for failure to follow the monitoring plan. In an e-mail dated January 30, 2004, Chuck Semborski wrote: “...Energy West has acquired a second field monitoring instrument to record field pH and conductivity instead of relying on lab measurements.”

As was discussed with Chuck Semborski at Energy West’s Huntington office on January 22, 2004, if monitoring of specific sites is no longer providing useful information, the plan needs to be modified to eliminate acquisition of unnecessary data; otherwise, the plan needs to be followed as written.

**4. Were irregularities found in the data?** YES [X] NO [ ]

*Comments, including identity of monitoring site:*

79-34: total Fe (n = 9) was outside the two standard deviation range;

91-73 (not a required site): flow (n = 20) and Na (n = 10) were outside the two standard deviation range;

MF-10: flow (n = 6) was outside the two standard deviation range;

RR-5: flow (n = 8) was outside the two standard deviation range;

UPDES UT0023604-001 July: Ca (n = 72), Mg (n = 72), K (n = 72), carbonate (n = 16), bicarbonate (n = 159), and total alkalinity (n = 176; not a required parameter) were outside the two standard deviation range;

UPDES UT0023604-001 August: Ca (n = 72) and Mg (n = 72) were outside the two standard deviation range.

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

1<sup>st</sup> month, YES  NO   
2<sup>nd</sup> month, YES  NO   
3<sup>rd</sup> month, YES  NO

*Identify sites and months not monitored:*

Operational monitoring data and DMRs were submitted electronically for all three months.

**6. Were all required DMR parameters reported?**

YES  NO

*Comments, including identity of monitoring site:*

UPDES parameters that are not included in the parameter lists in the MRP (floating solids, sanitary waste, and visible foam) are not reported to either DOGM or Water Quality.

**7. Were irregularities found in the DMR data?**

YES  NO

*Comments, including identity of monitoring site:*

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

If monitoring of specific sites is no longer providing information necessary to protect the hydrologic balance and water rights or is no longer necessary to achieve the purposes of the water monitoring plan, the Permittee should consider amending the plan to minimize or eliminate acquisition of the unneeded data.