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July 10, 1990

TO: Pamela Grubaugh-Littig, Permit Supervisor
FROM: Jeff Emmons, Reclamation Hydrologist *J.E.*
RE: Inspection Notebook, Utah Power and Light Company,
Cottonwood/Wilberg Mine, ACT/015/019, Folder #2, Emery County, Utah

Synopsis

While reviewing the Cottonwood/Wilberg Permit Application Package (PAP), I found two items that must be addressed in order to complete the inspection notebook.

Analysis

Designation of Water Quality Monitoring A goal of the inspection notebook is to provide the Division's inspector a guide and checklist of items that must be reviewed to conduct a complete inspection. Typically, that includes a list of water quality sampling points, parameters, and sampling frequencies required by the coal rules.

Utah Power and Light Company (UP&L) has three mines - Cottonwood/Wilberg, Deer Creek and Des-Bee-Dove. The mines are located in close proximity to each other and the water quality monitoring requirements are shared by each.

The vast majority of the sampling points are influenced by more than one mines activity. The three mines overlap geographically and hydrologically. UP&L currently submits all the hydrologic monitoring data as one program.

In a July 6, 1990 telephone conversation with Val Payne, Senior Environmental Engineer, it was agreed that it would not be logical to separate the sampling point and designate them to the responsibility of individual mines. Rather, all the sampling points should be included for review in each mine plan.

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UPDES The Cottonwood/Wilberg Mine has water quality sampling points associated with their UPDES permit. To determine compliance with Section 731.222.2 of the Coal Mining Rules, the UPDES permit must be included in the PAP.

Recommendations

UPDES The following information must be submitted for inclusion into the PAP.

1. Copies of the UPDES permits for each of the three mines and map(s) identifying the UPDES sampling points.
2. Copies of the UPDES permits must be included in the mine's annual report.

Designation of Water Quality Monitoring All the water quality sampling points must be included in each mine's inspection notebook.

djh
AT54/13-14