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WATER QUALITY MEMORANDUM

Utah Coal Regulatory Program

July 2, 2004

TO: Internal File

THRU: Daron Haddock, Permit Supervisor *DH*

FROM: James D. Smith, Environmental Scientist *DS*

RE: 2004 First Quarter Water Monitoring, PacifiCorp, Cottonwood / Wilberg Mine, C/015/0019-WQ04-1, Task ID # 1878

The mine was sealed May 10, 2001, so in-mine monitoring sites TMA @ 32 and 2ndS XC-11 are no longer accessible. The pond at the Cottonwood Fan Portal was reclaimed in 2002 and UPDES 22896-002 is no longer reported to DOGM or the Division of Water Quality.

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 3/06/04, renewal due 7/06/04. 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:

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

WCWR1: Field pH (n = 28) was outside the two standard deviation range.

5. Were DMR forms submitted for all required sites?

1st month, YES [X] NO []
2nd month, YES [X] NO []
3rd month, YES [X] NO []

Identify sites and months not monitored:

DMRs were submitted in electronic format (Adobe). DMR data were submitted to the DOGM database as operational parameters, not as DMR parameters.

The pond at the Cottonwood Fan Portal was reclaimed in 2002 and UPDES 22896-002 is no longer reported to DOGM or the Division of Water Quality.

During the second quarter 2003, a sample was collected from some standing water near the Miller Canyon portals to satisfy USFS requirements. It is questionable that this was mine discharge water. Sampling for the USFS requirements is to continue semi-annually for two years (through second quarter 2005?). The last measured UPDES discharge was July 1996, and the portals are sealed and the area reclaimed.

6. Were all required DMR parameters reported? YES [] NO [X]

Comments, including identity of monitoring site:

DMR parameters that are not included in the operational parameter lists in the MRP - such as sanitary wastes, visible foam, and floating solids - are not reported on the DMRs nor in the electronic submittal.

7. Were irregularities found in the DMR data? YES [X] NO []

Comments, including identity of monitoring site:

UPDES UT0022896-001 all three months: DMR TDS-Daily Max, in lbs/day (n = 1), was outside (below) the two standard deviation range, apparently because values for this parameter have been entered into the Division's database only once. All values are well below the 2,000 lbs/day UPDES loading limit.

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

There is no further action to recommend t this time.