

WATER QUALITY MEMORANDUM

UTAH COAL REGULATORY PROGRAM

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October 15, 2008

TO: Internal File

FROM: James D. Smith, Environmental Scientist *JS 10/15/08*

SUBJECT: 2008 First Quarter Water Monitoring, CO-OP Mining Company, Bear Canyon Mine, C/015/0025, Ongoing Task ID # 2716

The monitoring plan is described on pages 7-48 through 7-60A of the MRP. It includes Tables 7-12 through 7-17.

This is the second consecutive quarter that analysis for dissolved Pb has been missed at SBC-9A.

1. Were data submitted for all of the MRP required sites?

In-mine YES NO

SBC-9A replaced SBC-11 for monitoring water in this section of the #1 Mine; however, additional roof falls made Mine #1, including SBC-9A, inaccessible. The pipe that carries the water out of the mine to the culinary water supply is now the location for water quality and quantity monitoring, and SBC-9A has been retained as the name for this sampling site. Analysis for dissolved Pb is to be done quarterly at SBC-9A.

Springs YES NO

Streams YES NO

UPDES YES NO

Only UTG040006-004 discharged in the first quarter 2008. 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 in the electronic submittal to the Division.

Wells YES NO

2. Were all required parameters reported for each site?

In-mine YES NO

Dissolved lead (Pb) was not reported for SBC-9A

Springs YES NO

Streams YES NO

UPDES YES NO

Wells YES NO

No wells are monitored during the first quarter.

3. Were any irregularities found in the data?

Listed parameters were outside two standard deviations. An asterisk (*) indicates the parameter is not required.

In-mine YES NO

Dissolved Pb was not reported for SBC-9A

Springs YES NO

SBC-3 February: Na and Cl.

Streams YES NO

CK-2 February: water temperature, DO, field electric conductivity, and Ca;
BC-2 February: Na and K.

UPDES

YES NO

UTG040006-004 February: Cl and TDS.

Wells

YES NO

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

Baseline parameters are to be taken in August of year 5 prior to each permit renewal (Table 7.14). The next permit renewal date is November 02, 2010, so the baseline analyses should be done on samples collected in August 2010.

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

The Permittee needs to assure that analysis is done for dissolved Pb at SBC-9A. Field electric conductivity and DO were zero at CK-2: these are unlikely values for these parameters. The Permittee needs to assure their instruments are working properly and calibrated before taking field readings.

6. Does the Mine Operator need to submit more information to fulfill this quarter's monitoring requirements?

YES NO

Analysis for dissolved Pb was missed during the first quarter 2008 at SBC-9A; the time to submit this missing data for the first quarter 2008 has passed.

7. Follow-up from last quarter, if necessary.

This is the second quarter in a row that analysis for dissolved Pb has been missed at SBC-9A.

8. Did the Mine Operator submit all the missing and/or irregular data?

YES NO

Analysis for dissolved was missed during the first quarter 2008 at SBC-9A.