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WATER QUALITY MEMORANDUM

UTAH COAL REGULATORY PROGRAM

February 2, 2009

TO: Internal File

FROM: James D. Smith, Environmental Scientist III *JDS 2/2/09*

SUBJECT: 2008 Second Quarter Water Monitoring, CO-OP Mining Company, Bear Canyon Mine, C/015/0025, Ongoing Task ID # 3157

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

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, roof falls in 2002 and 2003 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. Equipment containing several tons of lead and acid were trapped in the mine by the roof falls, and since October 2002, analysis for dissolved Pb has been done quarterly at SBC-9A.

Springs

YES NO

Streams

YES NO

UPDES

YES NO

Only UTG040006-004 discharged in the second 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

Springs YES NO

Streams YES NO

MH-2: NH₃, NO₂, NO₃, phosphate, As, B, Cd, Cu, Pb, Se, Zn, Al, and Mo are missing (baseline is to be collected from 2nd Qtr. 2007 to 1st Qtr. 2010. The Analysis Request - Chain of Custody form indicates these analyses were requested by the Permittee and their omission is the lab's error.)

UPDES YES NO

Wells YES NO

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

SBC-9A: flow
SCC-3 (16-8-8-10): bicarbonate as CaCO₃

Springs YES NO

SBC-18: field specific conductivity and Ca
SCC-1: flow
SMH-2: field specific conductivity

Streams YES NO

BC-2 May: Na, K, and Cl.

BC-3 May: flow, TSS, Mg, total hardness, TDS, and
CK-1 May: Mg and Na
CK-1 June: TSS
CK-2 May: lab specific conductivity
MH-1 June: DO

UPDES

YES NO

UTG040006-004 April 29: field specific conductivity, SO₄, and TDS
UTG040006-004 May 22: field specific conductivity, Cl, and TDS
UTG040006-004 May 31: field specific conductivity

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?

Field DO was zero at MH-1 in June: this is an unlikely value for this parameter. The Permittee needs to assure their instruments are working properly and calibrated before taking field readings.

Baseline parameters NH₃, NO₂, NO₃, phosphate, As, B, Cd, Cu, Pb, Se, Zn, Al, and Mo were not reported for second quarter 2008 at MH-2 (baseline is to be collected from second quarter 2007 to first quarter 2010). Analysis Request - Chain of Custody forms provided by the Permittee indicate these analyses were requested by the Permittee and their omission is the lab's error; however, the Permittee must remember that it is their responsibility to monitor the lab to assure the correct analyses are done.

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

YES NO

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

During the last several quarters, analysis for dissolved Pb at SBC-9A was not done. The Permittee followed-up and made sure this analysis was done in the 2nd Quarter 2008.

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

YES NO