



# State of Utah

## DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF WATER QUALITY

Michael O. Leavitt  
Governor

Dianne R. Nielson, Ph.D.  
Executive Director

Don A. Ostler, P.E.  
Director

288 North 1460 West  
P.O. Box 144870  
Salt Lake City, Utah 84114-4870  
(801) 538-6146 Voice  
(801) 538-6016 Fax  
(801) 536-4414 T.D.D.

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April 4, 1997

Mr. Fred Craft  
U.S. Energy Corporation  
877 North 8th West  
Riverton, WY 82501

Subject: Shooting Canyon Mine, Information required for Construction Permit

Dear Mr. Craft:

As a follow-up to the meeting held on February 11, 1997 regarding the subject project, I would like to review some of the information that will be required and issues that must be settled prior to the completion of the engineering review of the project. Please respond to the issues raised below:

1. Leakage Action Plan - Section 7.2 of the Tailings Management Plan mentions that leakage into the collection sump for the leak detection system (of the Tailings Impoundment liner system) will be continuously monitored. Any indicated leakage will be pumped to a tailings or evaporation cell when necessary and there will be an alarm system to monitor the success of the pumping system. The condition of the liner system will then be evaluated on a weekly basis.

We would like you to expand this section to include an action plan which would specify what actions the company would undertake should the leak detection system exhibit leakage. Such a plan must include a indication of what leakage rate(s) would trigger what specific remedial action(s) for repair of the liner system or to stop leakage from entering the leak detection system.

2. Design of the Leak Detection System - Please provide further details as to the proposed design of the leak detection system. Such a system should be dependable, rapidly reporting and conducive to remediation of the liner when leakage occurs. We are interested in seeing an impoundment site plan detailing how the system fits in with the site's prevailing topography which shows the locations of drainage sump(s), monitoring piping, discharge locations and the designs and locations of evaporation basins. To maximize reliability, the simplest design is most preferable. It would be most advantageous if the leak detection system could be designed to report leakage by gravity, without the need for mechanical

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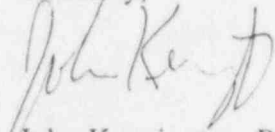
liner for the pond. Do you intend to change or upgrade that design? What is the source, anticipated quality and quantity of the water that is to be discharged into the pond?

7. Liquid Discharge after Closure - Section 4.1.1 of the amended Tailings Management Plan states: "Since the tailings management plan provides a means for disposing of all excess tailings liquids during the project operation, no significant amount of free tailings liquid will remain in the impoundment at project termination to seep into the groundwater. Also, after the project is terminated, normal evaporation from the tailings cap or radon barrier will dispose of the incident precipitation, including runoff. A limited potential therefore exists for groundwater contamination from this project..."

As a clarification of this statement, do you anticipate that no free liquids will drain from the tailings impoundment after closure? Before your personnel vacate the site, and prior to transfer or property title from Plateau Resources, will there be no liquid discharge from the tailings impoundment area, and will that condition remain in perpetuity? How will other stormwater flows from the drainage basin be handled as they flow in close proximity to the project site?

Please be aware that construction of the facilities cannot begin until the Ground Water Discharge Permit, (with Construction Permit included), is issued. After completion of the draft ground water permit, it will be subject to a 30 day public comment period prior to issuance. If you would like to discuss any aspects of this correspondence further please contact me or Mr. Mark Novak of this office at your convenience.

Sincerely,



John Kennington, P.E.  
Design Evaluation Section

JK:

cc:

✓ James Park, USNRC  
Mark Novak, UDWQ  
Loren Morton, UDRC  
Richard Hall, UDNR  
Scott Hacking, UDEQ  
Bill Dawson, SWUPHD