LAW OFFICES

EDWARD J. McGRATH

14" FLOOR

SI MONROE STREET

MON KVILLE, MARYLAND 20850

(301) 340-0600

June 18, 1979

Mr. Albert J. Hazle, Director Radiation & Hazardous Wastes Control Division Colorado Department of Health 4210 East Eleventh Avenue Denver, Colorado 80220

Dear Mr. Hazle:

Reponsive to inquiries made by yourself and other officers of the Department of Health during our meeting on June 6, 1979, I enclose a copy of a letter addressed to this office by W. A. Wahler and Associates under date of June 12, 1979 pertaining to movement of the existing tailings; the design of the tailings dewatering drains, and the timing of utilization of the criteria for migration of raffinates set forth in John Logan's letter of June 5, 1979.

Sincerely yours,

Edwa d J. McGrath

EJM: bmm Enclosure

cc: Mr. Ross Scarano



538 128

79080807/7

PALO ALTO • WASHINGTON DE • NEWPORT BEACH 1023 CORPORATION WAY P.O. BOX 10:12 P=10 ALTO, CALIFORNIA 94303

(415) 968-6250 * TELEX NUMBER: 348-42" * 2+8/2 *DORESS: WAWAENCUSA

June 12, 1979 Project MSM-1014

Mr. Ed McGrath Law Offices 51 Monroe Street Unibank Building Rockville, Maryland 20850

RECEIVED

- the stand

JUN 1 5 1979

Subject: Cotter Tailings Impoundment

Supplemental Questions from the State on Existing Tailings Transfer Proposal EDWARD J. McGRATA

Dear Ed:

In our telephone conversation of June 7, 1979 you mentioned that the State of Colorado has come up with supplemental questions concerning the proposed tailings transfer scheme. It is our understanding that these questions or comments involve the following:

- 1. How would the existing tailings be transferred say after two to three years of operations in the Mair Impoundment?
- With the tailings dewatering drains on top of the lining) 2. operational, what keeps the acid water in the Main Impoundment from mixing with the alkaline water in the Secondary Impoundment?
- In reference to John Logan's letter : June 5, 1979, additional clarification is requested concerning the third paragraph of Page 3. This deals with the delay in the implementation of the Lincoln Park criteria until the remedia_ action recommended in our October 1978 report has been ful; implemented.



Mr. Ed McGrath June 12, 1979 Page two

Our replies to the above questions or comments follow in sequential order.

- 1. If the Main Impoundment were operational for several years before it was decided to transfer the tailings without reprocessing, then a slightly modified approach to that presented on the attached Figure 1 would be required. The principal concern in this situation is that spigotting of the tailings for several years may partially fill the Auxiliary Impoundment and also create a less satisfactory base for the Divider Dike. To address these concerns, the following modifications to the procedures outlined on Figure 1 are proposed:
 - a. If and when it is decided to transfer the existing tailings without reprocessing, then spigot acid tailings along the Divider Dike alignment to create a substantial above-water beach. Construct the Divider Dike on top of this beach using flat slopes (say 3:1) to reduce seepage and promote stability. Pump any acid water in the Auxiliary Impoundment back to the Main Impoundment.
 - b. Depending on actual storage requirements and storage availability in the Auxiliary Pond, it may be necessary to extend the lining and Dike elevation beyond the Stage 1 level. However, it is not anticipated that the lining will have to be extended beyond its planned ultimate level.

Other than the above two changes, the same operational procedures listed on Figure 1 would apply.

538 130

Mr. Ed McGrath
June 12, 1979
Page three

2. As si

- As shown on attached Figure I-4, the tailings dewatering drains in the Main and Secondary Impoundments are completely separate and independent of each other. The drains do not run under the Secondary Dam.
- 3. The basic intent contained on Page 3, paragraph 3 of John Logan's letter dated June 5, 1979 was to allow the recommended remedial action to be accomplished before we started applying the monitoring criteria in Lincoln Park. Basically, we are saying that lets pump out and clean the SCS reservoir and abandon all the existing tailings ponds (except 1 and 6) before we apply criteria to tell us if Ponds 1 and 6 need to be transferred. It is not intended that new baseline data be established in Lincoln Park.

It is hoped that the above information is sufficient for your purposes. If there are any further questions regarding this matter, please contact me at your convenience.

Sincerely yours,

W. A. WAHLER & ASSOCIATES

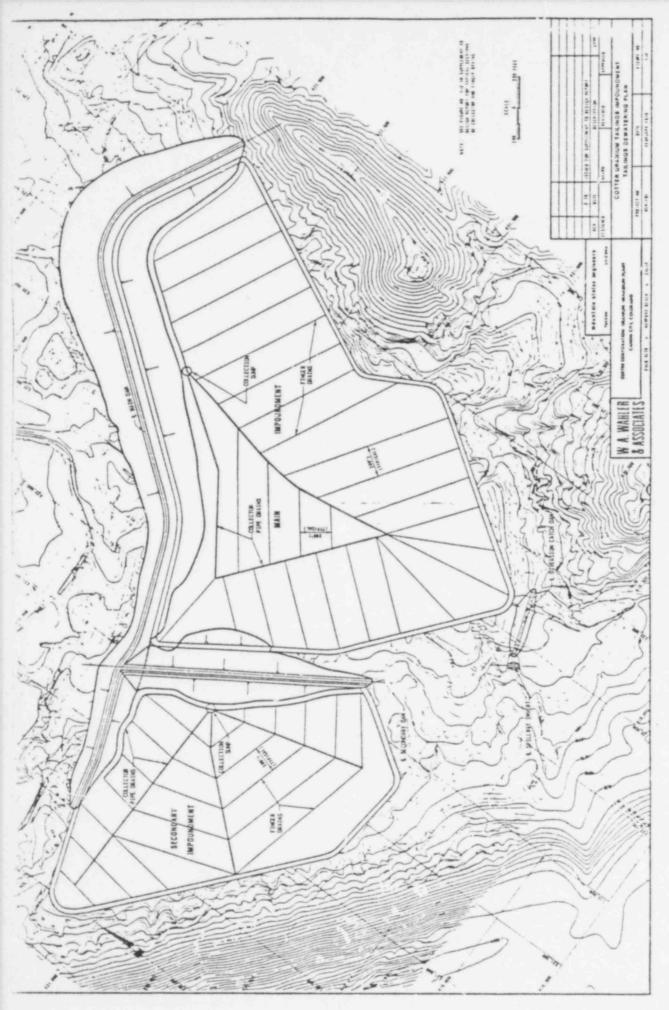
Richard H. Lubina Project Manager

RHL/jm

Enclosures

cc: Mr. J. Pierce Mr. J. Logan

538 131



538 132