AUG | 6 1990

URFO: ROG Docket No. 40-4492

Department of Environmental Quality ATTN: Mr. Dennis Hemmer Herschler Building 122 W. 25th Street Cheyenne, Wyoming 82002

Dear Mr. Hemmer:

In a letter dated July 26, 1990, you informed us that ANC had expressed a concern that they may be unable to complete the Phase III-A work, i.e., placement of a portion of the radon cover, before winter arrives. ANC has requested that a bond release be made for the portion of the Phase III-A work to be completed before winter shutdown.

The problem with releasing money for radon cover placed this year is that a portion of the radon cover will have to be reworked in the spring when construction resumes. This will be necessary because during the winter months, the radon cover will undergo cycles of freezing and thawing which will reduce its density. This will require disking and recompaction of the upper layers of the in place radon cover in the spring when construction resumes.

We therefore do not recommend that bond releases be made for work that has to be repeated next year. If ANC wants to proceed with the Phase III-A work, we recommend that they provide a plan for protecting the radon cover over the winter. An acceptable plan would be to place about 3 feet of loose soil over the radon cover prior to winter shutdown. Adequate diversion of runoff would also have to be addressed. The loose soil would then have to be removed in the spring when construction resumes, and the radon cover would have to be tested to assure that it met moisture and density requirements. We have already discussed this with ANC, and they have indicated that they probably will not place any radon cover this year.

A second item intioned in your July 26, 1990, letter concerns consolidation of the tailings i impoundment No. 2. Based on our review of the information provided by AN we do not agree that 90 percent consolidation has occurred at

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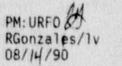
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all of the monitoring locations. Therefore, additional monitoring will be required before we can agree that sufficient sett'ement has occurred.

Should you have any questions, please contact us at (303) 236-2805.

Since ely,

Original Signed By: R. E. HALL

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Ramon E. Hall Director

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