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30 EAST GRINNELL

ED HERSCHLER GOVERNOR

Department of Environmental Quality 40-8714

LAND QUALITY DIVISION DISTRICT IV OFFICE TELEPHONE 307-672-6488

February 28, 1983

SHERIDAN, WYOMING 82801

Mr. Truman Louderback Director of Environmental Affairs The Cleveland-Cliffs Iron Co.

RE: Collins Draw In-Situ Project, RD3

Dear Mr. Louderback:

Casper, Wyoming 82602

P.O. Box 3140

Members of the Land Quality and Water Quality Division staff met in Cheyenne on February 23, 1983 to discuss the status of wellfield restoration at the Collins Draw project.

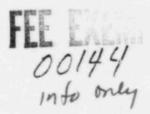
The following conclusions were reached during the meeting:

- Restoration of ammonia has been adequate to achieve the standard of 30 mg/L agreed upon during the meeting of October 25, 1982.
- Restoration of arsenic and selenium has been inadequate. Additional restoration is required to reach the quality of use standards of .05 mg/L for arsenic and .01 mg/L for selenium.

For any parameter not brought to the quality of use standards, Cleveland-Cliffs must demonstrate that they have used best practicable technology. Supporting data is required demonstrating that the "point of diminishing returns" was reached for each restoration technique. We would expect to see curves and charts to demonstrate the decline in efficiency as the total quantity of groundwater circulated increased.

3) There is concern that the extent of the excursion of lixiviant outside the wellfield area to the south was not all detected by monitoring wells numbers 238 and 298 nor was all the lixiviant recovered by pumping in the wellfield and the two monitor wells.

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> To detect any further escaped lixiviant, we are considering requiring Cleveland-Cliffs to drill and complete as many as three (3) monitor wells in this area.

However, before this decision is made, we request additional information on the subsurface geology in the area south of the wellfield. Geologic cross-sections, geophysical (electric) logs, and geologists' logs from any exploration drill holes for this area should be submitted to enable our offices to determine the likelihood of zones of permeability extending from the wellfield to the south and also aid us in the siting of any possible further monitor well or wells.

Any information classifiable as a trade secret submitted may be considered confidential at your request.

4) After restoration has been achieved to the aforementioned values and all other parameters except ammonia have been brought to a minimum quality of use standard, a stabilization period as per the license conditions will be instituted.

During the period of stabilization, monitoring for the full Guideline 8 parameters will be required.

5) Regarding restoration and reclamation of the leachfield, the Department will work with the NRC to insure minimum duplication of effort.

If you have any questions, please contact this office.

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Sincerely,

Glen Mony

Glenn Mooney Geologist

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xc: John Linehan, NRC Dick Lennox, WQD Kathy Mueller-Ogle