



THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

Department of Environmental Quality

PDR

LAND QUALITY DIVISION

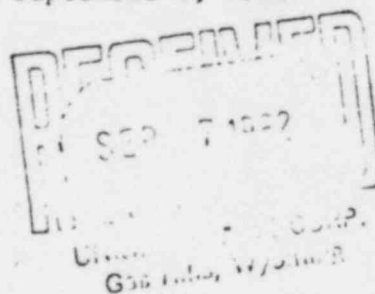
401 WEST 19TH STREET

TELEPHONE 307-777-7756

CHEYENNE, WYOMING 82002

September 3, 1982

Mr. Tom Wong
Environmental Coordinator
Union Carbide Corp.
P.O. Box 5100
Gas Hills Station
Riverton, WY 82501



*Henry -
Enclosed is a
copy of DQA &
letter to UCC re:
meeting to discuss
A-9 tailings.
12/15/82*

RE: 349C

Dear Tom:

Enclosed please find a copy of Bill Kearney's memo of September 2, 1982. This memo represents the Department's view relative to your letter of August 6, 1982. This means that things are progressing satisfactorily with respect to the A-9 disposal pit, and that Mr. Hoffman's report, due October 31, 1982, will be the next reference point for this subject.

Please note (see Francis memo of August 30, 1982) that the abandoned tailings issues of groundwater quality will be reviewed again by Bill Kearney and you will then get a reply to your letter of August 16, 1982. Of course, we anticipate your sending a letter of justification for the opinions expressed in your August 16, 1982 letter. Mr. Kearney should have this letter before he begins his re-evaluation.

Sincerely,

Ed Francis

Ed Francis
District III Engineer

EF:klr

Enclosure

cc: Bill Kearney



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MEMORANDUM

TO FILE: Union Carbide Corporation, Permit No. 349C

FROM: Bill Kearney, Chief Hydrologist *WPK*

DATE: September 2, 1982

SUBJECT: Response to letter dated August 6, 1982 from Tom Wong of UCC to W.C. Ackerman

A. Introduction

In a letter dated August 6, 1982, Tom Wong of Union Carbide responded to the W.C. Ackerman letter of July 16, 1982 (which included the Kearney review memo dated July 15, 1982). This memo is a response to the August 6, 1982 letter from Tom Wong. This response was somewhat delayed in order that a field inspection of the site could be accomplished (see Francis memo dated August 30, 1982).

B. Comments Regarding UCC's letter of August 6, 1982

1. RE: Item IV.b. - UCC's response concerning the abandonment of Deep Well 1 is adequate.
2. RE: Item IV.c. - UCC's response concerning the evaporation pond seepage detection system is adequate. The field inspection on August 26, 1982 showed this to be true (see Francis memo dated August 30, 1982).
3. RE: Item IV.d. - UCC's response concerning the consultant hired to resolve the A-9 seepage problem is adequate. The Land Quality Division should, in writing, make UCC aware that the consultants report and finding should be submitted to the Division no later than October 31, 1982.
4. RE: Item IV.e. - UCC's response concerning the "decant system" is adequate. The field inspection of August 26, 1982 (see Francis memo dated August 30, 1982) showed that a barge with a pump is being used to decant water off the A-9 disposal area. The decanted water goes to the South Evaporation Pond.

C. Conclusions

UCC's responses are adequate. UCC should be required to submit the consultants report concerning findings and mitigation by October 31, 1982.

EK:lmk

cc: District III
Gary Beach

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MEMORANDUM

TO FILE: Permit No. 349C

FROM: Ed Francis, District III *EF*

DATE: August 30, 1982 (Inspection on August 26, 1982)

SUBJECT: Hydrologic Inspection of A-9 Pit (Disposal) and Evaporation Ponds
(see Kearney Memo)

On August 26, 1982 at approximately 8:50 AM Bill Kearney and Ed Francis met P. Lyons, T. Wong, T. Scott, and G. Horton of Union Carbide in Mr. Lyon's office. Ed Francis outlined the purpose of the visit:

1. Observe the A-9 pit tailings disposal.
 - a. Compare the on-going activity to the approved design for activity.
 - b. Measure water levels.
2. Check out monitoring systems.
 - a. A-9 pit.
 - b. Evaporation ponds.
 - c. Old tailings.

The group proceeded to the A-9 pit area and Francis photographed the pit, noting that the pump house roof represents the approximate expected level to which the pit will be filled with tailings.

Wong estimated that presently about 25 feet of slimes have accumulated in the pump house area of the pit. The sands are the beach areas on the opposite side of the pit.

Francis photographed Wong and Kearney measuring water depth in the area of the pump house. The water was about four (4) feet deep, barely within the expectations of the designed set-up.

At the area next to the pump house the group addressed the subject of seepage. Seepage from the pit is indicated by monitor well data, and mounding is indicated by piezometric contouring in the pit area. Photographs of side wall sections were taken to document the lensing and variability of the bedding and sediments of the lower Wind River formation.

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August 30, 1982
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At the upper area above the A-9 pit between it and the north evaporation pond, a southwest facing panorama was taken which shows the relationship of the pit to the pond. The pump house is the site from which excess tailings liquor is pumped up to the evaporation ponds. The upper pump house between the A-9 pit and the ponds, and between the ponds, is the recovery pump for sending fluid from the ponds to the mill.

The group then decided to examine the seepage detection systems for the evaporation ponds. This would lend credence to Union Carbide's contention that the mounding was not contributed to by the ponds, if these detection points were dry. Both detection points were dry. The checking of them was documented by photographs.

A photographic panorama of the A-9 pit area from the SE bank was taken. This vantage point allowed view of most of the pertinent monitoring points which are denoted in the accompanying photos.

The drainage along East Canyon Creek was checked out again and verified to be in the same condition reported by Giurgevich earlier in the year. The opened up area was re-vegetating quite well and it was decided not to require any refinement of the channel grade since a matter of only 2-4 feet of depth for a few hundred feet is involved. A very small impoundment area (dry at time of inspection) exists above the re-built drainage.

The other blocked drainage, on the east-southeast side of the outer spoil, will be unblocked at the appropriate time. Now it is preventing erosion and sedimentation of an unreclaimed spoil toe.

At 11:00AM the group returned to the office for discussions as follows:

1. Monitoring Data.
 - a. Wong sees improvement in quality for old tailings wells. LQD will re-evaluate data.
 - b. Wong agreed that there is seepage and mounding of groundwater indicated from the A-9 pit. George Hoffman will submit an analysis and proposed mitigation scheme.
2. Wong reported that Roy Williams has been assigned to Union Carbide considerations by the NRC, as consultant to the NRC.
3. Deep well one is sealed.
4. Kearney will respond to latest Wong letter which will help narrow down issues.

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5. Hoffman will submit a report and plan for mitigation of A-9 seepage by October 31, 1982.

6. Concerning the old tailings area (the area subject to the proposed reclamation plan for heap leach and tailings), District III requests further review by Kearney of monitoring data, and requests a written summary from Union Carbide of justification for their desired procedures.

7. Another conclusion, achieved prior to discussions in the office, is to leave the reclaimed East Canyon Creek drainage as is.

EF:dlw

cc: Tom Wong, Environmental Coordinator
Bill Kearney

5 PHOTOS were
also enclosed.

They are with the
original in C. File.