



ENERGY FUELS RESOURCES (USA) INC.

**RESPONSES TO
REVIEW OF AUGUST 15, 2012 (AND MAY 31,
2012) ENERGY FUELS RESOURCES (USA)
INC. RESPONSES TO ROUND 1
INTERROGATORIES ON REVISION 5
RECLAMATION PLAN REVIEW, WHITE
MESA MILL SITE, BLANDING, UTAH,
REPORT DATED SEPTEMBER 2011**

AUGUST 31, 2015

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ATTACHMENTS

ATTACHMENT A	Supporting Documentation for Interrogatory 01/1: Mill Building, Boiler Plant, Scale House, and the Sample Plant Asbestos Inspection Report
ATTACHMENT B	Supporting Documentation for Interrogatory 02/1: Revised Reclamation Plan Drawings to Attachment A of Reclamation Plan, Revision 5.0
ATTACHMENT C	Supporting Documentation for Interrogatory 03/1, 04/1, and 13/1: Revised Technical Specifications and Construction Quality Assurance/ Quality Control Plan to Attachment A and B of Reclamation Plan, Revision 5.0
ATTACHMENT D	Supporting Documentation for Interrogatory 06/1: Revised Appendix E, Slope Stability Analysis, to the Updated Tailings Cover Design Report (Appendix D of the Reclamation Plan, Revision 5.0)
ATTACHMENT E	Supporting Documentation for Interrogatory 07/1 and 09/1: Revised Appendix F, Settlement and Liquefaction Analyses, to the Updated Tailings Cover Design Report (Appendix D of the Reclamation Plan, Revision 5.0)
ATTACHMENT F	Supporting Documentation for Interrogatory 08/1: Revised Appendix G, Erosional Stability Evaluation, to the Updated Tailings Cover Design Report (Appendix D of the Reclamation Plan, Revision 5.0)
ATTACHMENT G	Supporting Documentation for Interrogatory 11/1: Revised Appendix D, Vegetation and Biointrusion and Revised Appendix J, Revegetation Plan, to the Updated Tailings Cover Design Report (Appendix D of the Reclamation Plan, Revision 5.0)
ATTACHMENT H	Supporting Documentation for Interrogatory 12/1: Revised Appendix C, Radon Emanation Modeling, to the Updated Tailings Cover Design Report (Appendix D of the Reclamation Plan, Revision 5.0)
ATTACHMENT I	Supporting Documentation for Interrogatory 16/1: Revised Radiation Protection Plan

DIVISION'S ASSESSMENT OF EFR RESPONSES TO RD 1 INTERROGATORY WHITE MESA REC PLAN 5.0; R313-24-4; 10 CFR40.31(H); INT 01/1; RESPONSES TO RECLAMATION PLAN REV. 4.0 INTERROGATORIES

The Division requests that EFR include the additional costs for removing the identified ACM in the estimate of costs to decontaminate and decommission the mill. The Division will review the revised reclamation cost estimates, when available, to verify that these costs have been included in the reclamation cost estimates.

Response:

Energy Fuels Resources (USA) Inc. (EFRI) submitted asbestos inspection reports as Attachment A to EFRI (2012) for the following facilities:

- Administration Building
- Mill Building, Boiler Plant, Scale House, and the Sample Plant
- Maintenance-Warehouse Facility
- SX Building

The asbestos inspection report for the Mill Building, Boiler Plant, Scale House, and the Sample Plant erroneously included inspection information for the Maintenance-Warehouse Facility. The asbestos inspection report for the Mill Building, Boiler Plant, Scale House, and Sample Plant has been revised and the report is provided as Attachment A to this response document.

Costs for removing asbestos containing material (ACM) identified in the asbestos inspection reports are currently incorporated in the annual surety estimates. These costs will also be included in the reclamation cost estimate in the next version of the Reclamation Plan.

Reference for Response:

Energy Fuels Resources (USA) Inc. (EFRI), 2012. Responses to Interrogatories – Round 1 for Reclamation Plan, Revision 5.0, March 2012. August 15.

DIVISION'S ASSESSMENT OF EFR RESPONSES TO RD 1 INTERROGATORY WHITE MESA RECPLAN REV 5.0 R313-24-4; 10CFR40 APPENDIX A, CRITERION 4; INT 02/1; ENGINEERING DRAWINGS

Based on review of the above Response, the Division finds that although EFR provided narrative descriptions of the changes it intends to make to engineering drawings, revised drawings were not submitted with interrogatory responses. Rather, EFR committed to provide revised engineering drawings with the "next revision of the Reclamation Plan". The Division will review the revised engineering drawings, when available, to verify that these changes to the drawings have been made. Because EFR submitted neither revised engineering drawings nor the revised Reclamation Plan in its interrogatory response, this interrogatory will remain open.

Response:

Revised engineering design drawings are provided as Attachment B and incorporate (1) the applicable proposed changes listed in EFRI (2012) for this interrogatory, (2) the revised cover design based on technical analyses presented in EFRI (2012) and included as attachments to this response document, and (3) recent topography provided by EFRI.

Reference for Response:

Energy Fuels Resources (USA) Inc. (EFRI), 2012. Responses to Interrogatories – Round 1 for Reclamation Plan, Revision 5.0, March 2012. August 15.

DIVISION'S ASSESSMENT OF EFR RESPONSES TO RD 1 INTERROGATORY WHITE MESA REVISED RECPLAN 5.0; R313-24-4; 10CFR40 APPENDIX A, CRITERION 4; INT 03/1; CQA/CQC PLAN, COVER CONSTRUCTABILITY, AND FILTER AND ROCK RIPRAP LAYER CRITERIA AND PLACEMENT

The Division finds EFRs' Response to the first item of this interrogatory pertaining to materials to be placed into Cell 1 – i.e., EFR's commitment to revise all sections of the CQA/CQC Plan, Technical Specifications, and the text of the Reclamation Plan itself to preclude placement of tailings into the Cell 1 Disposal Area, and to identify the Cell 1 area as the "Cell 1 Disposal Area" in all documents – to be acceptable. These revised documents will need to be reviewed, when available, to verify that these changes have been made. Because these revised documents were not submitted in its interrogatory response, this interrogatory will remain open.

Based on its review of the section of EFR's response pertaining to the constructability of the currently proposed cover system having such extremely flat topslope inclinations, the Division is unable to concur with EFR's contention that such flat inclinations can be constructed uniformly and reliably over the entire required topslope area, as insufficient supporting information and justification have been submitted to satisfactorily support the contention. This issue needs to be addressed before appropriate conclusions can be reached.

In addition to the Division's uncertainties related to the constructability of the currently proposed cover, insufficient information has been provided in Attachment A (Technical Specifications, Section 8) and Attachment B (CQA/CQC Plan, Section 6) to the Rev 5.0 Reclamation Plan or in EFR's response regarding the means and procedures that would be implemented for controlling, verifying, and documenting layer thicknesses and final grades across the top portions of the cover. Examples of information missing that should be provided are discussions regarding the need for use of Global Positioning System (GPS) and computer terrain modeling technology and how these might be combined to provide for a Computer Aided Earthmoving System (CAES) for verification of soil compaction and thicknesses of layers as they are being installed and undergoing compacted during each pass of the compaction equipment over placed loose lifts (e.g., Caterpillar 2003). The advantage of this methodology is that it provides a continuous record in a continuous manner across the entire cover area footprint, rather than acquiring data at a series of isolated points. Discussions of soil density tests and independent land surveys for demonstrating the effectiveness of the CAES method, and procedures that may be used for visual monitoring of the CAES-verified compaction process and review of CAES-generated computer records for each layer of soil placed by on-site QC personnel, should also be provided. A more detailed discussion should also be provided of companion sand cone tests and moisture tests to be performed along with nuclear tests until a sufficient number of have been performed to demonstrate a clear correlation between results obtained using these test methods. Similar procedures to those described here have been accepted and are in use at the Crescent Junction, Utah uranium tailings repository (e.g., see U.S. DOE-EM/GJ1547 [DOE 2012]).

The Division finds the filter layer gradation and permeability criteria and proposed construction quality assurance testing procedures and frequencies to be acceptable. The revised CQA/CQC Plan will need to be reviewed, when available, to verify that these changes have been made. Because the revised CQA/CQC document was not submitted in its interrogatory response, this interrogatory will remain open.

The Division also finds EFR's commitment to revise Section 5.7.1 of the CQA/CQC Plan and Section 8.2.4 of the Technical Specifications to include a required minimum thickness of the rock riprap layer equal to 1.5 times the D50 rock riprap diameter of 7.4 inches, or the D100 of the rock riprap materials, whichever is greater, to be acceptable. The revised CQA/CQC Plan and revised Technical Specifications

will need to be reviewed, when available, to verify that these commitments will be faithfully implemented. Because these revised documents were not submitted in its interrogatory response, this interrogatory will remain open.

Based on review of the information provided in the Response with respect to rock riprap placement and construction quality assurance testing, the Division notes that EFR did not address certain additional specific recommendations included in Appendix F (Rock Placement Procedures for Erosion Protection) of NUREG-1623 (NRC 2002) in their response to this interrogatory, but which should be addressed. Additional NUREG-1623 recommendations that should also be addressed/ implemented include the following:

- *Initial testing should be conducted to determine the gradation and the rock weight/unit volume that will be achieved in future rock placement activities.*
- *No individual rock piece should exceed 90% of the riprap layer thickness*
- *Dumped riprap should be placed to its full course thickness in one operation and in such a manner as to avoid displacing any underlying bedding material*
- *It should be declared that rearranging of individual stones by mechanical equipment or by hand may be required to the extent necessary to obtain a well-keyed and reasonably well-graded distribution of stone sizes and that larger pieces of riprap may require individual placement by equipment.*
- *Any stones that are not firmly wedged should be adjusted and additional selected stones inserted or existing stones replaced, so as to achieve a solid interlock.*

Based on its review of the section of EFR's response pertaining to settlement and of the referenced revised settlement analyses, the Division is unable to assess the correctness of EFR's conclusion regarding cover performance with respect to settlement due to errors, omissions, discrepancies, and insufficient information in the materials submitted. These issues need to be addressed before appropriate and reliable conclusions can be reached. These issues are more fully discussed in Sections 7.0 and 9.0 below relative to the response to Interrogatory 07/01, Technical Analysis - Settlement and Potential for Cover Slope Reversal and/or Cover Layer Cracking and 09/01, Technical Analysis - Liquefaction. Evidence should also be provided that the eight UMTRCA repository sites (which EFR claims have slopes similar to the 0.5 to 1% slopes proposed for the subject site) have performed adequately and that demonstrates that future differential settlement of those repositories during the 200- 1,000 –year performance period of those facilities will not occur to a degree that flattening/slope reversal of the topslope portions of those covers would result. Such information should include currently observed differential settlements and predictions of future settlements calibrated to the observed performance.

Response:

The Division states that they accept EFRI's commitment to revise all sections of the CQA/CQC Plan, Technical Specifications, and the text of the Reclamation Plan to denote the Cell 1 area as the "Cell 1 Disposal Area" and to note that this area will not include disposal of tailings. This information has been added to the revised Technical Specifications and CQA/CQC Plan provided as Attachments C.1 and C.2, respectively to this response document, for Division review. The designation of "Cell 1 Tailings Area" to "Cell 1 Disposal Area" will be revised in Section 3.2 of the main text in the next version of the Reclamation Plan.

The Division expressed concern regarding constructability of the proposed cover slopes ranging from 0.5 to 1 percent. Cover with similar slopes have been permitted and constructed for Uranium Mill Tailings Radiation Control Act (UMTRCA) Title I and II sites including:

- Falls City Title I site in Texas (less than 1% cover slopes)
- Bluewater Title II site in New Mexico (0.5 – 4% cover slopes)
- Conquista Title II site in Texas (0.5 – 1% cover slopes)
- Highland Title II site in Wyoming (0.5 – 2% cover slopes)
- Panna Maria Title II site in Texas (0.5% cover slopes)
- Ray Point Title II site in Texas (0.5 – 1% cover slopes)
- Sherwood Title II site in Washington (0.25% cover slopes)
- L-Bar Title II site in New Mexico (0.1% cover slopes)

EFRI proposes to place the final cover in two phases for each cell. The first phase would consist of placement of the majority of the cover, without the erosion protection layer and possibly a portion of the water storage/frost protection/radon protection layer. For Cell 2, this first phase of cover placement would take place after approval of the Reclamation Plan and completion of the License renewal. The second phase of final cover placement would occur after sufficient settlement has occurred from dewatering of tailings and placement of the first phase of final cover. Between the first and second phase of cover placement, additional interim cover would be placed in any low areas to maintain positive drainage of the interim cover surface. Results of settlement analyses (see Attachment E) indicate that potential differential settlement after active maintenance will be sufficiently low that ponding and slope reversal is not expected to occur on a cover slope of 0.5 to 1.0 percent. Work completed on the final reclamation cover, as described above, will be credited against the annual reclamation cost update submitted to the State of Utah on March 4th of each year.

Settlement monuments, as well as water levels within the tailings, will be monitored on a regular basis. Settlement monuments are currently surveyed monthly with a quality control check done annually by a certified Surveyor. A detailed standard operating procedure (SOP) is used for the settlement monitoring. Results are reported to the Division annually in the Annual Technical Evaluation Report (ATER). Mini-piezometers will be installed across the each cell prior to the first phase of cover placement. This data will provide information on settlement and dewatering of the cells to confirm the final phase of cover can be placed and when active maintenance is no longer required.

Grading control for construction of the reclamation cover shall be achieved with Global Positioning System (GPS) guided equipment. This requirement has been added to the Technical Specifications as requested by the Division. The Computer Aided Earthmoving System (CAES) is a type of GPS-guided grading control method.

Text has been added to Sections 5.2, 5.3.6, 5.4.5, and 5.6.3 of the CQA/CQC Plan to note that a sufficient number of sand cone and moisture content tests will be performed to provide a correlation between the sand cone and nuclear density tests.

The Division states that they accept the filter layer gradation and proposed construction quality assurance testing procedures and frequencies. Sections 8.2.5 and 8.4.7 of the Technical Specifications (Attachment C.1) and Section 5.7.1.2 of the CQA/CQC Plan (Attachment C.2) have been revised to include the updated testing frequency and filter material gradation requirements.

The Division states that they accept the proposed revisions to Section 5.7.1 of the CQA/CQC Plan and Section 8.2.4 of the Technical Specifications to include a required minimum thickness of the rock riprap layer equal to 1.5 times the D_{50} rock riprap diameter, or the D_{100} of the rock riprap materials, whichever is greater. This information has been added to the Technical Specifications (Attachment C.1) and CQA/CQC Plan (Attachment C.2).

The Division requests additional information be added to the CQA/CQC Plan for riprap placement based on recommendations in NUREG-1623 (NRC, 2002). The following text has been added to Section 5.7.2 of the CQA/CQC Plan (Attachment C.2).

- Initial testing should be conducted to determine the gradation and the rock weight/unit volume that will be achieved in future rock placement activities.
- Individual stones shall not be greater than 90 percent of the riprap layer thickness.
- Dumped riprap shall be placed to its full course thickness in one operation and in such a manner as to avoid displacing bedding material.
- Hand placement or rearrangement of individual stones will be required only to the extent necessary to secure the results specified above. Larger stones may require individual placement by equipment.
- Any stones that are not firmly wedged shall be adjusted and additional selected stones inserted or existing stones replaced, so as to achieve a solid interlock.

The Division did not comment on EFRI's proposed revisions to Sections 5.7.1.1, 5.7.2 and 5.7.4 of the CQA/CQC Plan for riprap placement provided in EFRI's Response 5 to Interrogatory 03/1 (EFRI, 2012). It is assumed that the Division is in agreement with these proposed revisions and EFRI has included the revisions in the revised CQA/CQC Plan (Attachment C.2).

The settlement analysis and liquefaction analyses have been revised to incorporate the site-specific tailings data collected in October 2013 (MWH, 2015) and address the Division's comments provided in DRC (2013). The responses to the Divisions review comments on these analyses and a summary of the revised results are provided in the responses to Interrogatories 07/1 and 09/1.

References for Response:

- Energy Fuels Resources (USA) Inc. (EFRI), 2012. Responses to Interrogatories – Round 1 for Reclamation Plan, Revision 5.0, March 2012. August 15.
- MWH Americas, Inc. (MWH), 2015. White Mesa Mill Tailings Data Analysis Report. Prepared for Energy Fuels Resources (USA) Inc. April.
- U.S. Nuclear Regulatory Commission (NRC), 2002. Design of Erosion Protection for Long-Term Stability, NUREG-1623, September.
- Utah Department of Environmental Quality, Division of Radiation Control (DRC), 2013. Review of August 15, 2012 (and May 31, 2012) Energy Fuels Resources (USA), Inc. Responses to Round 1 Interrogatories on Revision 5 Reclamation Plan Review, White Mesa Mill, Blanding, Utah, report dated September 2011. February 13.

DIVISION'S ASSESSMENT OF EFR RESPONSES TO RD 1 INTERROGATORY WHITE MESA RECPLAN REV 5.0 R313-24-4; 10CFR40, APPENDIX A, CRITERION 4; INT 04/1; VOID SPACE CRITERIA FOR DEBRIS, RUBBLE PLACEMENT, AND SOIL/BACKFILL REQUIREMENTS

The Division's assessments of these responses are summarized below.

- a. *Maximum Void Space Percentage: EFR does not state a maximum allowable void space due to the lack of practical means of quantifying residual void space following placement and backfilling. In lieu of stating a void space limit, EFR incorporates practices and requirements that were developed for the UMRAP/UMTRCA and FUSRAP projects and that have been demonstrated effective in limiting settlement. EFR has developed and will implement method specifications that reflect best management practices, as documented in Attachment A "Plans and Technical Specifications for Reclamation of White Mesa Mill Facility; Blanding, Utah".*

The practices call for compressible materials to be crushed or covered with soils (thus reducing residual void space), while voids in and around incompressible materials will be filled with soils or, if needed, grout.

The Division judges these specifications to be acceptable.

- b. *Construction Practices: Processing, placement, backfilling, and compacting of debris and organic material are discussed in Sections 7.3 and 7.4 of Attachment A "Plans and Technical Specifications for Reclamation of White Mesa Mill Facility; Blanding, Utah". According to these specifications:*
- Some larger items and items with internal voids will be size reduced to expose voids so they can be filled.*
 - Debris items will be placed to minimize nesting that could lead to residual voids after backfilling.*
 - Compressible debris will be flattened or crushed.*
 - Voids will be backfilled with soil, sand, or grout as judged appropriate by CQA Manager.*

These specifications constitute current best management practices and we judge them to be acceptable given current state of knowledge.

- c. *Controlling Residual Voids: EFR's QA staff will observe construction practices to ensure that specifications for reducing void space within debris are met. The interrogatory response includes a statement that "The QA staff will make a recommendation to the Contractor for the implementation of a grouting program in instances when voids, either within a debris mass, or within a vessel, cannot be properly filled with soil using conventional equipment".*

No reference to a "grouting program" exists in Attachment A "Plans and Technical Specifications for Reclamation of White Mesa Mill Facility; Blanding, Utah". Attachment A should be revised to formalize this commitment.

- d. *Effects of Void Space on Settlement Analyses: EFR's response is given in its response to INT 07/1. EFR's response notes that the cover system will not be constructed "... until settlement monitoring of the subsurface shows the anticipated settlement has taken place."*

An additional criterion should be added requiring that observed settlement has stabilized according to some reasonable criterion.

- e. Percentage of Organic Materials: EFR's response makes several statements that, as far as we are able to determine, are not supported or documented:*
 - "The percentage of organic materials to be disposed of is anticipated to be a small percentage of the total material being disposed."*
 - "... the biodegradation of these materials is not anticipated to compromise the integrity of the cover system."*

EFR should provide additional information to support these statements and provide confidence that the integrity of the cover system will not be compromised.

- 1. Segmenting and Placing Metallic Waste Materials: Section 7.3 of Attachment A "Plans and Technical Specifications for Reclamation of White Mesa Mill Facility; Blanding, Utah" requires that larger debris items be size reduced, that larger pieces are not stacked on top of each other, that large structural shape either be placed edge to edge or spaced far enough that voids can be filled and equipment can operate between them, that the maximum dimension be 20 feet, that the maximum volume of any piece of debris be 30 cubic feet, and that long structural members be placed horizontally, and that any piece not satisfying these requirements be reworked.*

These provisions are considered acceptable.

- 1. Types of Materials and Placement Practices: Section 7.3 of Attachment A "Plans and Technical Specifications for Reclamation of White Mesa Mill Facility; Blanding, Utah" places limits of 20 feet in length and 30 cubic feet in volume.*

Although the interrogatory response mentions a maximum pipe length of 10 feet, this limit is not stated in the Attachment A. EFR should revise Attachment A to state the maximum pipe length if it is less than 20 feet.

- f. Relative Quantities of Debris, Rubble, and Contaminated Soil: EFR should revise Attachment A to address the possibilities mentioned in the interrogatory response, should relative quantities of debris, rubble, and contaminated soil not allow Cell 1 to be closed as planned.*
- g. Backfilling Voids Inside Debris Objects: EFR proposes to revise Attachment A to incorporate the statement "The voids on the inside of the item shall be filled with contaminated soil, clean fill soil, or grout (controlled low-strength material, flowable fill, etc...). Contaminated soil (Section 7.3.3) or clean fill will be placed outside of the items and compacted with standard compaction equipment (where possible) or hand-operated equipment to the compaction requirements in Specification Section 7.4." EFR also describes measures that could be taken to ensure that voids inside debris items are filled. These include:*
 - Filling the voids with soil through an existing opening*
 - Filling the voids with soil by cutting the item open*
 - Crushing the item flat (so no voids remain within)*
 - Cutting pipes short, standing them on end, and filling them with soil*
 - Pumping controlled low-strength material (CLSM or grout) into a region to form a monolithic grouted mass*

These proposed revisions are acceptable and should be incorporated into Attachment A as proposed and other documents as appropriate.

- h. CLSM Compressive Strength Requirements: EFR states that grout, if required, will be formulated to “mimic, as closely as possible, the strength and hydraulic properties of the contaminated soil that will also be used for filling voids within the debris.”*

EFR should state more specifically how these properties will be achieved and what formulation is likely to produce the desired outcome.

Response:

The following text has been added to Section 7.4.1 of the Technical Specifications (Attachment C.1) to reference recommendation of a grouting program, where needed. In addition, discussion of a grouting program has been added to Section 7.3.6.

“The CQA technicians will make a recommendation to the Contractor for the implementation of a grouting program in instances when voids, either within a debris mass, or within a vessel, cannot be properly filled with soil using conventional equipment.”

Organic debris will be size-reduced by crushing, chipping or shredding prior to placement. As described in the Technical Specifications, organic material will only be placed in lifts less than 12 inches thick and mixed with the soil and other incompressible debris during placement to prevent pockets of organic material from being created. Organics mixed with soil for spreading will be limited to 30 percent by volume of the mixture. This limit has been added to the Technical Specifications (Attachment C.2).

Additional interim cover will be placed during active maintenance in any low areas on the cover to maintain positive drainage of the cover surface due settlement including due to debris void spaces and/or organics.

The Division requests that a maximum pipe length of 10 feet be added in the Technical Specifications. A limit of 10 feet or less is already listed for cut pipe pieces from demolition debris in Section 7.3.7 of the Technical Specifications, therefore this text addition is not required.

Section 3.3 of the Technical Specifications (Attachment C.2) has been revised to include the following text.

“If sufficient debris, rubble and contaminated soil are not available to fill Cell 1 as designed, the footprint of Cell 1 can be reduced in size so that the horizontal dimension extending out from Cell 2 is reduced and the lateral extent of the disposed materials is reduced to be closer to the base of the Cell 2 impoundment. If a design modification is required for Cell 1, it will be submitted to the Division for review and approval and these Technical Specifications will be revised accordingly.”

Section 7.3.6 of the Technical Specifications (Attachment C.2) has been modified to as proposed in EFRI (2012) to provide revised and additional information on backfilling of

voids inside debris objects. Text has also been added to this section to provide additional discussion on grout strength requirements.

Reference for Response:

Energy Fuels Resources (USA) Inc. (EFRI), 2012. Responses to Interrogatories – Round 1 for Reclamation Plan, Revision 5.0, March 2012. August 15.

DIVISION'S ASSESSMENT OF EFR RESPONSES TO RD 1 INTERROGATORY WHITE MESA RECPLAN 5.0 R313-24-4; 10CFR40, APPENDIX A; INT 05/1; SEISMIC HAZARD EVALUATION

Results of the Division's review of EFR's Response to each individual interrogatory statement in this Round 1 interrogatory are summarized below.

As stated in the Basis for the Interrogatory and Round 1 Interrogatory statement #5, "The USGS National Hazard Maps should not be used for developing site-specific seismic design parameters (personal communication between Dr. Mark Petersen, Chief, National Seismic Hazard Mapping Project and Ivan Wong of URS Corporation, 2010) for critical and important facilities. For such types of facilities, a site-specific probabilistic seismic hazard analysis (PSHA) is recommended." However, contrary to this recommendation, Denison's consultant MWH in response used the USGS National Hazard Maps (specifically the interactive deaggregation tool) to recommend design ground motions for the facility. EFR did not perform a site-specific PSHA as requested. Use of the National Hazard Maps does not constitute a site-specific PSHA. The maps are four years old and are in the process of being updated. PSHA computer software such as EZFRISK® are readily available to perform a site-specific PSHA. Below are specific comments on EFR's responses to the interrogatory statements:

- 1. Please further clarify the rationale for selecting the annual probability of exceedance of hazard for the facility.*

EFR has adequately responded to this statement.

- 2. Adjust the cited USGS National Hazard Map PGA value of 0.15 g for the site Vs30 as appropriate.*

EFR states that the site-specific Vs30 (time-averaged shear-wave velocity in the top 30 m) as determined by Tetra Tech (2010) was 586 m/sec corresponding to a NEHRP site class E or soft soil. This is an erroneous statement. A Vs30 of 586 m/sec actually corresponds to a NEHRP site class C, very dense soil or soft rock. MWH also estimated the Vs30 for the site and concluded that the Vs30 ranged from 620 to 700 m/sec corresponding to a NEHRP site class D or stiff soil. This is also incorrect. This range in Vs30 also corresponds to a NEHRP site class C. Aside from these errors, the shear-wave velocity (Vs) estimate for the 10 m of soil appears reasonable although SPT does not measure Vs directly and so the uncertainties in the inferred Vs can be significant. However the technical basis for the Vs for the remaining 20 m of interbedded sandstone needs to be provided.

As stated above and in Statement 5, a request had been made not to use the National Hazard Maps but to perform a site-specific seismic hazard evaluation. The assumption that a site Vs30 of 760 m/sec is appropriate for the site allowing use of the maps is problematic.

More importantly, the characterization of the site as a thin soil site where there is 10 m of soil over firm (?) rock (Tetra Tech, 2010) indicates that a site response analysis is now required to address site effects on ground motions. The sharp Vs contrast between the lower velocity soil and the higher velocity rock will amplify short-period ground motions like PGA by as much as a factor of 2 for low rock ground motion inputs. The use of Vs30 in a site-specific hazard analysis will not capture these site amplification effects (Abrahamson, 2011). A site response analysis with a Vs profile into the rock should be performed. Using an equivalent-linear or fully non-linear computer code would be acceptable. It is recommended that direct measurements of Vs be made for input into the site response analysis.

- 3. Explain why the calculated hazard for the background earthquake PGA of 0.24 g was estimated but ignored in the recommendation provided in Appendix E.*

EFR did not respond to this statement. However that question is now irrelevant because of the following actions. As recommended and agreed to by Denison in Response 3, a site-specific PSHA is the best approach for quantifying the hazard at the site particularly from background earthquakes. Denison states that was done as in discussed in Response 5 and as contained in Attachment A. A site-specific PSHA was in fact not performed but the National Hazard Maps were used as stated above and below.

4. *Provide information to justify the use of 15 km distance for a background earthquake Mw 6.3 event.*

EFR's response referred back to Response 3. EFR stated that the 15 km distance was selected because it would provide a conservative PGA at the site. This response fails to answer the question. A distance of 10 km would also provide a "conservative PGA at the site". However, this is now an irrelevant question because a deterministic seismic hazard analysis is to be replaced by a site-specific PSHA although such an analysis has yet to be performed.

5. *Perform and report results of a site-specific PSHA in lieu of using the USGS National Hazard Maps for developing site-specific seismic design parameters.*

As commented above, a site-specific PSHA was not done and the 2008 USGS National Hazard Maps were used. The USGS National Hazard Maps consider the Colorado Plateau in which the site is located as part of the central and eastern U.S. with respect to ground motion prediction models. Denison's Attachment 5 shows those ground motion models. Recent research by the USGS (McNamara et al. 2012) and studies for the proposed Blue Castle nuclear power plant site near Green River (Jennie Watson, personal communication, Dec 2012) indicate that is an erroneous assumption and that the use of western U.S. ground motion prediction models is more appropriate. Early site-specific PSHAs including an analysis for the NRC-regulated Atlas Moab tailings site (Wong et al. 1996) and the U.S. Bureau of Reclamation's Glen Canyon Dam (URS 1999) used western U.S. ground motion models. This is another reason why the National Hazard Maps should not be used for developing site-specific design parameters. It is strongly recommended that the Next Generation of Attenuation (NGA) ground motion prediction models be used in the site-specific PSHA for White Mesa. It is expected that the USGS will use the NGA models for the Colorado Plateau in the 2013 National Hazard Maps.

Response:

EFRI conducted a site-specific probabilistic seismic hazard analysis (PSHA) for the White Mesa Mill site to address the Division's comments for this interrogatory. Three versions of the report were submitted to the Division, with the final version submitted in April 2015 (MWH, 2015). The Division provided a final technical review of the report on May 28, 2015 (DRC, 2015) which stated the remaining review items were adequately addressed. The results from this report were used to update technical analyses for the Reclamation Plan. The updated analyses are discussed in other responses and will be included in the next version of the Reclamation Plan.

Reference for Response:

MWH Americas, Inc. (MWH), 2015. White Mesa Mill Probabilistic Seismic Hazard Analysis Report. Prepared for Energy Fuels Resources (USA) Inc. April.

Utah Department of Environmental Quality, Division of Radiation Control (DRC), 2015. Geotechnical Final Review of Energy Fuels Resources (USA) Inc., White Mesa Mill, Tailings Data Analysis Report dated April 2015, and Probabilistic Seismic

August 31, 2015

Hazard Analysis Report dated April 2015, RML#UT1900479, San Juan County, Utah. May 28.

DIVISION'S ASSESSMENT OF EFR RESPONSES TO RD 1 INTERROGATORY WHITE MESA RECPLAN REV 5.0 R313-24-4; 10CFR40, APPENDIX A, CRITERION 1; INT 06/1; SLOPE STABILITY

The Division finds that the revised slope stability analysis provided in the revised Attachment D to the EFR response did not adequately address several considerations and criteria that may be important to the analysis of the stability of the closed tailings embankment, including the following:

- *No details were provided regarding shear strength data for the liner and LCRS components in Cells 4A and 4B*
- *No information was provided as how the bottom liner component(s) was (were) simulated in the global stability analysis completed for cross Section A through Cell 4B*
- *No details were provided regarding shear strength data for the liner and LCRS components in Cell 2*
- *No information was provided as how the bottom liner component(s) was (were) simulated in the global stability analysis completed for cross Section B through Cells 2 and 1*
- *Insufficient information was provided regarding:*
 - 1) *the estimated in-place dry density, in-place moist density, and in-place saturated density (unit weight values) of the tailings;*
 - 2) *rationale for selecting the tailings condition and tailings properties assumed in the analysis (e.g., drained vs. undrained conditions and for selection of in-place moist tailings density vs. in-place saturated tailings density for long-term static conditions or long-term seismic conditions); and*
 - 3) *the location of the assumed water table, e.g., if drained condition assumed;*
- *The discussion and Table E.1 in Attachment D of table of the material properties used in the model did not distinguish between different material strength parameters assumed for long-term static conditions vs. long-term seismic conditions, e.g., no discussion of percentage reduction in strength properties for the seismic (pseudostatic) stability analysis was provided;*
- *No discussion of or rationale was provided for whether it may be appropriate and reasonably conservative to assume that the tailings dewatering system might be clogged, possibly leading to ineffective drainage at the base of the tailings cell in area including the lowest point in the tailings bottom surface and therefore possibly result in an undrained condition within the tailings. For such a case, undrained tailings strength relationships might suggest strength values for the tailings that may be different than those assumed by EFR; and*
- *No discussion or rationale was provided for whether it may be appropriate and reasonably conservative to assume that the strength parameters for the clay liner in the Cell 1 area might be estimated based on the PI that would lead to the weakest strength, or estimated using some other method that would generate the weakest estimated shear strength value for the clay liner.*

The Division requests that EFR, in Attachment D, further define how the tailings total unit weight value stated in Table E.1 (90 pcf) and used in the revised slope stability analysis was derived (or how representative a value that value is of the tailings). For example, tailings sample results (see Appendix F, Settlement and Liquefaction Analyses of Updated Tailings Cover Design Report, Denison 2011) indicate that the tailings have an average specific gravity of 2.73; if a dry unit weight of 90 pcf were assumed (Section E.3 of Attachment D of this Response,) an average tailings void ratio of about 0.89 would result.

Based on this void ratio, the tailings bulk density would be approximately 119.4 pcf, compared to the total unit weight of the tailings listed in Table E.1 of Attachment D of this Response of 95 pcf. Alternatively, if an average tailings dry unit weight of 86.3 pcf were assumed (as was done in Appendix F, Settlement and Liquefaction Analyses of the Updated Tailings Cover Design Report, Denison 2011), then an average tailings void ratio of about 0.97 would result. Based on this void ratio, the tailings bulk density would be approximately 117.2 pcf. EFR should reevaluate and verify that their assumed tailings properties, calculation methodologies, and assumptions are representative, reasonably conservative, and bounding.

Response:

The slope stability analysis has been updated to incorporate the revised cover grading and additional site-specific tailings data collected in October 2013 (MWH, 2015). The revised analysis is provided in Attachment D as part of the revised Appendix E, Slope Stability Analysis, which will be included in the next version of the Updated Tailings Cover Design Report (Appendix D to the Reclamation Plan).

The liner and LCRS components of Cells 2, 4A and 4B were not included in the slope stability analysis because the strength parameters of these components do not affect the reclaimed stability analysis. Failure surfaces representing the lowest calculated factors of safety do not intersect the liner and LCRS components, even for conservatively low shear strength conditions within the cells.

Tailings density values used in the slope stability analysis have been updated to incorporate the results of tailings testing conducted in October 2013 (MWH, 2015). The rationale for selecting the tailings condition and properties are provided in Attachment D.

A liquefaction analysis was conducted for the tailings and is presented in Attachment G. The results indicate the tailings are not susceptible to earthquake-induced liquefaction for reclaimed conditions. For materials that do not liquefy or lose shear strength with seismic shaking, seismic slope stability is analyzed by a pseudo-static approach. The unsaturated parameters used for the pseudo-static slope stability analyses are conservative representations of constant volume shear strength, and no further reduction is warranted.

The tailings are planned to be dewatered prior to placement of the final portion of cover. The phreatic surface was estimated to be five feet above the liner system for the analyses. Sensitivity analyses indicated that increasing the phreatic surface does not impact the location of the critical failure surface for the slope stability analyses.

The shear strength parameters for the clay liner for Cell 1 were estimated using the average measured PI (60) for samples meeting the placement specifications for minimum PI and percent passing the No. 200 sieve, and the generalized relationship between PI and effective angle of internal friction presented in Holtz and Kovacs (1981). The relationship in Holtz and Kovacs (1981) was based on normally consolidated clays. The stability analyses did not include cohesion, and the clay liner material will be compacted. Therefore the shear strength parameters used in the stability analyses are conservative values.

References for Response

Holtz, R.D. and W.D. Kovacs, 1981. An Introduction to Geotechnical Engineering. New York: Prentice-Hall.

MWH Americas, Inc. (MWH), 2015. White Mesa Mill Tailings Data Analysis Report. Prepared for Energy Fuels Resources (USA) Inc. April.

DIVISION'S ASSESSMENT OF EFR RESPONSES TO RD 1 INTERROGATORY WHITE MESA RECPLAN REV. 5.0; R313-24-4; 10CFR40, APPENDIX A, CRITERION 4; INT 07/1; TECHNICAL ANALYSIS - SETTLEMENT AND POTENTIAL FOR COVER SLOPE REVERSAL AND/OR COVER LAYER CRACKING

As discussed in the Response to Interrogatory No. 3 in Section 3.0 above, EFR did not provide settlement performance data or settlement prediction analyses for any of the other facilities referenced by EFR as having been constructed with a similar range of topslope inclinations. Similarly, EFR did not provide any information demonstrating a correlation between observed settlement at these repositories and the future settlement predictions developed for those facilities that might allow the performance of these facilities to be evaluated with respect to their observed or predicted post-construction behavior.

The revised settlement analysis included one-dimensional analyses of both primary consolidation and estimates of settlement due to creep associated with secondary consolidation occurring during (i) interim soil cover placement/loading; (ii) tailings dewatering; and (iii) final cover loading. EFR also provided estimates of seismically-induced settlement due to earthquake loading.

In its settlement analyses, EFR relies of data from settlement monuments in Cell 2 to estimate settlement parameters (e.g., compression indices and coefficients of consolidation) for the tailings. Each monument or monitoring point is treated independently, and the range of data and corresponding analytical results are reported in terms of maximum, minimum and average values. Examination of the data indicates that the 5 westernmost monuments or monitoring locations (2W12W2, 2W3, 2W3-S, and 2W4) behave very differently than the others, with an average observed settlement of about 0.77 feet from July 1991 (on average) to the start of dewatering in 2009, whereas the other data set only averages about 0.1 feet during a period most typically from July 2005 to January 2009. Given the grossly different amounts of settlement between the two sets of settlement data (and the issue not simply being a matter of greater tailings thickness), the use of a simple average across the two sets of data seems inappropriate. More importantly, given the relatively short time of settlement observation for the eastern monuments and the flat shape of the settlement curves, it seems likely that significant settlement occurred prior to monitoring, thus making this approach to settlement estimation problematic as was discussed in the first Interrogatory. If significant portions of the settlement time histories were not captured in the eastern monitoring data, the use of "average" values derived from the data (as apparently is the case currently) will not represent the behavior a majority of tailings under newly added load. On the other hand, if the range of settlement data as measured is representative of true settlement behavior, then a significant range of possible behavior should be expected (reflective of directive in the first round of interrogatories to consider a range of tailings ranging from fine grained slimes to coarse sands and their spatial distribution within the impoundment cells).

EFR has attempted estimate both compression indices and coefficients of consolidation for the tailing by curve fitting settlement data from five of the monitoring points (those possessing enough curvature to which a curve can be fit) with theoretical settlement curves. From the plots provided in Attachment E, it appears that something is amiss in the curve-fitting analyses since primary and secondary consolidation appears to be happening at the same time, rather than secondary occurring after completion of primary. Such an error would make the "back-calculated" indices and coefficients incorrect. This issue should be examined further. Again, as stated in the first round of Interrogatories, this back-calculation or curve-fitting approach is problematic at since the start of the settlement time history prior to monitoring is missing and a third variable (the effective drainage length) is not precisely known. Because of this, variance from calculated values should be expected and must be considered when evaluating subsequent cover performance. To better address the shortcomings inherent in using this curve-fitting/back-calculation approach, it was stated in the previous Interrogatory to "use consolidation parameters

obtained from site-specific testing of the tailings materials, reflecting both spatial and temporal variations in the tailings.”

The settlement analyses performed by EFR focused on evaluating settlement in the Cell 2 area only. No discussion or analyses were provided regarding any tailings management/disposal process-related differences such as different tailings placement methods/modes that may have occurred/might exist with regard to the various tailings disposal cells or of the effects that such differences might have on tailings consolidation and settlement behavior in each disposal cell area. Additionally, no discussion or analyses were provided for differences in dewatering system designs, differences in the expected dewatering efficiencies likely to occur between different cells (with resulting differences in saturated tailings thicknesses at the different stages in time evaluated in the settlement analyses), or differences in thicknesses of tailings in the different cells (e.g., tailings thickness in Cell 4A varies from about 26 to 42 ft, with an average thickness of about 34 ft, vs. tailings thickness ranging from about 14.5 ft to 28.50 ft in Cell 2).

In the Response to Item 2. of this Rd 1 interrogatory, EFR indicated that a final water level in the tailings in Cell 2 at the end of dewatering was estimated based on dewatering analyses presented in the Revised ICTM Report. However, the Reclamation does not contain a schedule for, a detailed description of, measures that EFR will undertake to ensure that dewatering of Cells 2 and 3 will be completed within the 7-year time period specified in the latest Financial Surety submitted to the Division by EFR, or a shorter time period. This is important since recent data suggests that the current rate of dewatering in Cell 2 may be on the order of 1 inch per year. As part of the additional settlement analyses that are needed to further address differential settlement and evaluate impacts of differential settlement on cover slope integrity/slope reversal, EFR needs to address additional requirements related to dewatering analyses, measures, costs, and schedule for dewatering of Cells 2 and 3 as described in Section 15.3 below.

In calculating the settlement of the tailings in Cell 2, it appears that tailings above elevation 5604.95 (a datum which seems to correspond to the average 2009 first quarter water levels plus an assumed 3-foot perched zone thickness) have been omitted from consideration during future dewatering and placement of the final cover (from time t1 to t2, and from t2 to t3). Even above the water table, these materials will respond to the added stresses from cover construction and their contribution to total settlement should be included.

Neither the response nor Attachment E presents a rationale for selecting tailings properties (e.g., specific gravity of tailings of 2.75, moist unit weight of 100.29 pcf above the capillary fringe, long-term moisture content of 16.2%, void ratio of 0.99 assumed for the Phase 1 analysis) to be used in the revised settlement analyses. Further, while unit weights for the various components of the cover system have been provided, their thickness have not all be provided, thus preventing a check of the stresses resulting from cover placement. The thickness of each component of the cover system needs to be indicated in the calculation spreadsheet.

Without a narrative and sample calculations for all of the spreadsheet results presented in Attachment E, it is difficult to assess the adequacy of the analysis presented. For example, it is unclear how the bottom elevation of the “upper zone” was determined, and then how the thicknesses of the upper and lower zones correspond to the drainage path used to determine the time for 90% consolidation. Such clarification need to be provided in order to assess the adequacy of the settlement calculations. General references to calculation methodology such as “Terzaghi et al. 1996, pages 223-240” are too general to satisfy this need for additional information.

It is unclear what time for primary consolidation was used in calculating the secondary settlement, and the reviewer is otherwise unable to assess the results calculated by EFR. Again, a narrative and/or sample calculations (or at least illustrative equations and a description of how specific values were determined) should be provided for all spreadsheet calculations in order to assess their correctness.

With respect to the calculated seismically induced settlement, there appears to be errors in the calculation process (for example, the vertical strain should be twice the resultant of the vertical strain for 15 cycles of shaking multiplied by the variable C_n [doubling is to account for the multi-directional application of strain as described in the referenced Stewart and Whang (2003) paper]). Also, the calculations incorrectly treat the tailings as a single layer subject to a constant amount of cyclic strain. The tailings should be discretized into smaller, discrete layers and the stress and strain calculations redone. Another apparent inaccuracy in EFR's calculation is an apparent capping of shear strain amplitude to 1.0%. In Stewart and Whang's cyclic strain charts (Fig 3 in their paper), cyclic shear strain values are shown up to 1%, which is a reasonable limit for compacted soils (noting that "compacted soils" is part of the title of Stewart and Whang's paper). However, the soils in question are uncompacted tailings in which cyclic strains could exceed 1%. Hence, extrapolation or another calculation methodology should be used to determine seismically induced settlement. Also, the Stewart and Whang procedure is not well established (vetted) within the geotechnical earthquake engineering community. Consequently, EFR should compare the results obtained using this procedure with those of a more-well established procedure such as Tokimatsu and Seed (1987) or Ishihara and Yoshimine (1992).

In reviewing Table 2 'Summary of Settlement Results', it is unclear how the values shown for "Total Settlement five years after placement of Final Cover due to Final Cover Placement, Creep, and a Seismic Event" in row 5 (minimum and maximum values of 0.52 to 0.83) were determined. While calculations supporting the preceding four rows of settlement results in the table are readily identified within the spreadsheet calculations presented in Attachment E, no explicit calculations justifying the fifth row of values are presented. Additional information is needed.

In its assessment of differential settlement and cover cracking analysis, ERF estimates that the "maximum potential differential settlement that could be expected between adjacent movement monitoring locations would be on the order of 0.3 feet." With typical spacings between monitoring locations of about 250 feet (scaled from the figure by the reviewer, and an explicit statement of such should be provided by EFR), this equates to an average deflection ratio (differential settlement) of about 0.12%, which is less than the proposed minimum cover slope of 0.5%, and hence on this basis, ponding is not expected. However, the value of 0.3 feet needs to be reassessed due to the issues just previously presented.

In assessing the potential cracking of the cover, EFR has relied upon the most critical combination of projected settlement of a monitoring point (0.9 ft at 2W4-S) and its associated distance away from the edge of the tailings cell (being for this monument 100 ft) to determine the greatest strain demand on the cover based on the approach of Lee and Shen (1969). This value is then compared to the cracking resistance based on an empirical relationship using soil index properties (Claire et al. of Morrison-Knudsen, 1993). While this approach is reasonable, the input for Lee and Shen's horizontal movement formula has been incorrectly selected. In the analysis, EFR has used the average slope of the settlement profile (0.9/100) rather than a local maximum which would include the effects of bending. This point is illustrated in the test data and illustrative example provided in Lee and Shen's paper: the vertical displacement between the two ends of their 93-inch long soil beam is 1 inch, yielding an average slope of about 1%; however, the maximum slope in their beam which includes bending is 2%, located near the middle of the beam. In Lee and Shen's paper, the maximum reported tensile horizontal strain is about 0.6%, derived from the 2% maximum (not 1% average overall) slope. To be consistent with Lee and Shen, EFR should use the expected peak slope between points, not the average between the two points. Assuming that the peak is twice the average as in Lee and Shen's test case (although ERF will need to provide a reasoned and defensible value specific to this project; representative published relationships depicting cover deformation shapes and tensile strain/distortion relationships include those included in Gourc et al. (2010) and Rajesh and Viswanadham (2010), the maximum horizontal strain appears to be twice that of the 0.028% previously reported, exceeding the reported maximum allowable strain of 0.05%, meaning that the layer is expected crack. The analysis must be redone to include the effects of localized bending as

was indicated in the first round of Interrogatories, and the performance of the cover reassessed accordingly.

Also relating to the cracking analysis, a thickness of 4.7 ft is used for the soil layer. However, the actual thickness of the sandy clayey silt soils in the tailings cover design, which collectively serve for radon attenuation is 8.8 ft per Figure 2-2 of the Revised ICTM Report (Denison Mines 2010). The analysis should either be revised to reflect this value or a justification provided for the value used.

As part of the previous Interrogatory, EFR was asked to “demonstrate that the results of settlement analyses are consistent with results of drainage/dewatering analyses, and ensure that drainage/dewatering analyses reflect the tailings and drainage conditions (including slime drain system) existing in each cell. In EFR’s Response, the following statement is made:

“It should be noted the assumptions made in the one-dimensional consolidation analyses of Phase 2 (i.e. complete coverage of the tailings impoundment by an infinitely-permeable underdrain system, and instantaneous drawdown to final water level) do not exist within the impoundment, and will result in an underestimation of the time required to achieve 90% consolidation. The results of the tailings dewatering analysis, which includes the 3-dimensional aspects of flow toward the underdrain strips, and a finite underdrain permeability, are considered to provide a more reliable estimate of the duration Phase 2 consolidation.”

Unfortunately, no further reference or discussion is presented regarding the dewatering analyses, and hence the question of time needed to reach 90% consolidation remains unresolved. Based on its consolidation settlement analysis, EFR reports that the time to reach 90 percent of primary consolidation due to dewatering of the tailings in Cell 2 ranges from 0.14 to 0.63 years. However, in the dewatering analysis (see Appendix J of Revised Infiltration and Contaminant Transport Modeling Report, White Mesa Mill Site, Blanding, Utah, by MWA 2010)), EFR reports that “the MODFLOW dewatering model predicts that the tailings would drain down nonlinearly through time reaching an average saturated thickness of 3.5 feet (1.07 m) after 10 years of dewatering.” These two conclusions are not compatible. As part of this Response to Interrogatory, the results of the dewatering analyses need to be considered in conjunction with the settlement analyses and the subsequent assessment of cover settlement.

As stated previously, no explicit discussion or analyses were provided regarding any tailings management/disposal process-related differences such as different tailings placement methods/modes that may have occurred/might exist with regard to the various tailings disposal cells or of the effects that such differences might have on tailings consolidation and settlement behavior in each disposal cell area. Additionally, no discussion or analyses were provided for differences in dewatering system designs, differences in the expected dewatering efficiencies likely to occur between different cells (with resulting differences in saturated tailings thicknesses at the different stages in time evaluated in the settlement analyses), or differences in thicknesses of tailings in the different cells.

In summary, based on review of all of the above, the Division concludes that the analyses provided by EFR are, in general, overly simplistic and do not adequately account for the full range of different conditions that may occur with the tailings management cells area. Extrapolating assumed tailings parameters and properties from published data on tailings at other facilities creates additional uncertainties in the consolidation, settlement, stability, and liquefaction analyses. Assumed data must be supplemented by site-specific data; alternatively, the most reasonably conservative values might be used if adequate assessment and justification is provided. Justifications for some parameter values are lacking in EFR’s response. EFR should provide additional analyses that specifically address the different factors and conditions and their effects referenced in the preceding paragraphs. Also, there appears to be several errors, omissions, discrepancies, and insufficient information in the analyses conducted and provided by EFR which need to be addressed before appropriate and reliable conclusions can be reached.

Response:

EFRI conducted a tailings investigation of Cells 2 and 3 at the White Mesa Mill site in October 2013 to address the Division's comment for this interrogatory and Interrogatory 09/1 requesting collection of site-specific tailings data to supplement existing tailings data used settlement analyses. Results are presented in MWH (2015b). Settlement analyses have been updated to incorporate the additional site-specific tailings data, as well as the revised cover grading design, results of the recent site-specific probabilistic hazard analysis (presented in MWH, 2015a), and revised procedures for the seismic settlement analysis. The revised analyses are provided in Attachment E, Settlement and Liquefaction Analyses, and will be included in the next version of the Updated Tailing Cover Design Report (Appendix D to the Reclamation Plan).

These revisions address the Division's comments which include requests for (1) collection of site-specific tailings data to supplement exiting tailings data, (2) use of site-specific tailings data to evaluate settlement, (3) inclusion of all layers into the settlement analyses, (4) revisions to seismic settlement calculations, and (5) revisions to differential settlement calculations. To evaluate changes in settlement and water levels due to dewatering and placement of final cover prior to and after final cover placement, EFRI will conduct settlement monitoring and install mini-piezometers across the cells prior to the first phase of cover placement. This data will provide information on the rate and extent of dewatering of the cells and settlement to confirm when the final phase of cover can be placed and when active maintenance is no longer required.

Evaluation of total settlement due to final cover placement and dewatering indicates potential future settlement during active maintenance of approximately 0.9 to 1.6 feet for Cells 2 and 3. During this time, additional fill can be placed in any low areas in order to maintain positive drainage of the cover surface. The total estimated settlement that could occur (due to creep and seismic settlement) after the maintenance time period is estimated to range from 0.3 to 0.7 feet. This estimated differential settlement is sufficiently low that ponding or slope reversal is not expected to occur on a cover slope of 0.5 to 1.0 percent. The results of the settlement analyses also indicate that cover cracking of the highly compacted radon barrier is not expected.

Similar results are expected for Cells 4A and 4B. Although Cells 4A and 4B have higher tailings thicknesses, these cells have a more effective dewatering systems and a low water level requirement for dewatering. These cells also have a slightly steeper average cover slope (approximately 0.8 percent) than Cells 2 and 3.

References for Response

MWH Americas, Inc. (MWH), 2015a. White Mesa Mill Probabilistic Seismic Hazard Analysis Report. Prepared for Energy Fuels Resources (USA) Inc. April.

MWH Americas, Inc. (MWH), 2015b. White Mesa Mill Tailings Data Analysis Report. Prepared for Energy Fuels Resources (USA) Inc. April.

DIVISION'S ASSESSMENT OF EFR RESPONSES TO RD 1 INTERROGATORY WHITE MESA RECPLAN REV. 5.0; R313-24-4; 10CFR40, APPENDIX A, CRITERION 4; INT 08/1: TECHNICAL ANALYSIS – EROSION STABILITY ANALYSIS

The revised calculated 1-hr and 6-hr duration PMP values are equal to or smaller in magnitude than the respective PMP values previously determined (8.3 inches and 10.0 inches, respectively) using the method of Hansen et al. 1984. The existing design is, thus, oversized relative to precipitation projected to occur at the site. Therefore, the previous analyses are considered acceptable and bounding.

Review of the topslope erosional stability calculations indicates that these analyses are not complete and that the validity of certain assumptions used in these calculations has not been adequately demonstrated. Missing from these analyses, for example, are a sensitivity analysis case of bare soil conditions occurring on soil-only topslope surfaces (e.g., “uniform weathered earth” or bare soil condition) to simulate a lack of vegetation on these topslope areas, and a full analysis and justification for the estimated Manning’s “n” values appropriate for the soil-only surfaces, and gravel/soil admixture surfaces. For example, the response did not distinguish between an appropriate “n” value for uniform weathered earth conditions and “n” values for vegetated conditions; e.g., $n = (n_R^2 + n_S^2 + n_{\Psi}^2 - [0.0156])^{1/2}$ (Temple et al. 1987, p. 5).

Additionally, in the erosion analyses, EFR assumed a default flow concentration factor of 3, in accordance with recommendations in NUREG-1623 (NRC 2002). However, this assumption is valid only if uniform grading will be done during construction and differential settlement has been shown to be insignificant. As discussed in Section 3.3 above regarding the Response to Rd 1 Interrogatory 03/1 and in Section 7.0 regarding the Response to Rd 1 Interrogatory 07/1, neither the ability to construct the proposed flat topslope areas to a uniform slope nor the potential for differential settlement to occur in the tailings management area embankment after closure have been adequately demonstrated.

The EFR response and calculations and methodologies relating to sizing of angular and rounded riprap on the different sideslopes of the tailings cells area are considered acceptable.

The EFR response, calculations, and methodologies relating to evaluation of the filter gradation criteria are considered acceptable.

EFR committed to, but did not provide revised Drawings, revised CQA/CQC Plan, and revised Technical Specifications showing the filter and rock riprap layers. These revised documents will need to be reviewed, when available, to verify that these changes have been made. Because these revised documents were not submitted in its interrogatory response, this interrogatory will remain open.

EFR committed to, but did not provide revised Drawings showing the changes indicated for the rock riprap layer minimum thickness and cross sections. The revised drawings will need to be reviewed, when available, to verify that these changes have been made. Because these revised documents were not submitted in its interrogatory response, this interrogatory will remain open.

Response:

The erosional stability analysis has been updated to incorporate the revised cover grading. The revised analysis is provided in Attachment F as part of the revised Appendix G, Erosional Stability Evaluation, which will be included in the next version of the Updated Tailings Cover Design Report (Appendix D to the Reclamation Plan).

Based on the results of the plant survey conducted by EFRI in 2012 and evaluation of the plant cover performance at the Monticello site (which has similar environmental conditions), a plant cover estimate of 30 percent was determined to be a reasonable value for reduced performance (drought) conditions, rather than bare soil conditions. See Attachment G for further discussion. This value was used for the erosional stability analyses to represent long-term, lower-bound vegetation conditions.

NRC (2002) states that a concentration factor is used in the erosional stability calculations to account for imperfections in the slope (NRC, 2002). As noted in NRC (2002), the addition of a concentration factor is based on studies performed by Abt and Johnson (1991) which recommend a factor of 2 to 3. NRC (2002) recommends a default value of 3 for the concentration factor. Review of the Abt and Johnson (1991) study and follow up discussion with Steve Abt (Abt, 2012) confirm that the concentration factor included in the erosional stability calculations in NRC (2002) is intended to account for imperfections in the slope, and concentration and channelization of flow on the surface. Steve Abt (2012) also confirmed the recommendation of a concentration factor of 2 to 3 for cover slopes on uranium disposal facilities based on the Abt and Johnson (1991) study. The concentration factor of 3 presented in NRC (2002) was used in the analyses, and is applicable to the planned sequence of tailings settlement, monitoring, and cover placement.

The revised Drawings, Technical Specifications, and CQA/CQC Plan incorporated the results of the revised erosional stability analysis and the documents are provided in Attachments B, C.1, and C.2, respectively, for Division review.

References for Response

- Abt, S. R. and T.L. Johnson, 1991. "Riprap Design for Overtopping Flow." J. of Hydr. Engr., ASCE, 117(8), pp. 959-972, August.
- Abt, S., 2012. Personal communication from Steven Abt, Colorado State University, to Melanie Davis, MWH Americas, Inc. May 18.
- U.S. Nuclear Regulatory Commission (NRC), 2002. "Design of Erosion Protection for Long-Term Stability", NUREG-1623, September.

DIVISION'S ASSESSMENT OF EFR RESPONSES TO RD 1 INTERROGATORY WHITE MESA RECPLAN REV. 5.0; R313-24-4; 10CFR40, APPENDIX A, CRITERION 1; INT 09/1; LIQUEFACTION

In the Rd 1 interrogatory, EFR was requested to "provide revised liquefaction analyses that rely upon actual site-specific data for the tailings materials, rather than assumed parameters." EFR's response to this Interrogatory states that "a constant Standard Penetration Test (SPT) blow count (n-value) of 2 blows in 12 inches (uncorrected) is assumed for the tailings zones that will remain saturated under long-term steady state conditions." While this assumption of 2 blows in 12 inches (uncorrected) is a conservative reinterpretation of the previously assumed value of 4 blows in 12 inches, it is still only an assumption; it is not based on data. It is again requested that site-specific data for the materials be used in analyses, not assumed data. Alternatively, EFR should use, and provide adequate justification for demonstrating that the most reasonably conservative parameter values possible (are used) in all calculations.

The assumed SPT blowcounts are subsequently corrected using a fines content of 30, said to be based on an average of laboratory test values. Sands with this large of fines content are typically quite resistant to liquefaction (hence the much greater blow counts after the fines correction). Since the fines content value used to characterize the tailings is based on an average value (and given that the effect of fines content on liquefaction resistance is not linear), it is more appropriate to use a lower bound estimate of fines content rather than average value; otherwise, a false factor of safety may result for some of the coarser-grained materials. Again, as stated in the previous interrogatory, consideration should be given to the potential variation of properties of the tailings.

The liquefaction analyses presented in Attachment F use a peak ground acceleration of 0.15 g and a moment magnitude of 6.0. These values are consistent with those of revised probabilistic seismic hazard analyses. However, as part of the earlier deterministic analysis, Tetra Tech (2010) estimated a magnitude 6.3 for a random background event, said to be consistent with that used in previous seismic evaluations performed for sites in the Colorado plateau. Please clearly identify and justify the more appropriate value to use in the analyses, and revise analyses as needed.

The liquefaction analyses presented in Attachment F uses a dry unit weight of tailings of 90 pcf. Page C-4 of the REC plan (Denison Mines 2011) indicates that the dry unit weight of the tailings is 91.4 pcf, rather than 90 pcf. The dry unit weight of tailings used in the settlement analyses in Attachment E appears be 86.3 pcf. In the previous Interrogatory, it was stated that "consistent characterization of the tailings throughout the report seems to be needed." This issue remains unaddressed.

In the simplified liquefaction analysis procedure, the parameter K_σ which accounts for effects of confining stress is not used. At the base of the tailings, the currently computed effective vertical overburden stress is nearly two tons per square foot. At this value, Figure 14 of Youd et al. (2001) shows the value of K_σ for sands to be about 0.81, which would tend to reduce the as-calculated factor of safety. The factors of safety should be recalculated including the correction factor K_σ , or alternatively exclusion of this factor from analysis should be justified.

In the liquefaction analysis presented in the revised Attachment F, there appears to be multiple inconsistencies regarding the thicknesses of the various components of the cover system for each of the cells (and hence the stresses used in the analysis may be incorrect). Normal stresses calculated in the liquefaction analysis sheet are associated with assumed cover-system soil thicknesses, which appear in some instances to be too high, as well as with assumed relative compactions, some of which are too high. For example, the thickness of random fill material at 95% of Standard Proctor dry density in the cover is stated in the liquefaction analysis to be 4.7 feet for Cell 2. This appears to be too thick. Therefore, the

results of the liquefaction analysis itself, which depend on the "compacted cover" thickness, apparently are in error. The entire design cover system in the liquefaction analysis, from top to bottom, is claimed in the liquefaction sheet to be as follows:

Topsoil rock mulch: 0.5 feet thick.

Random fill at 85% of Standard Proctor dry density: 3.5 feet

Random fill at 95% of Standard Proctor dry density: 4.7 feet

Grading fill at 80% of Standard Proctor dry density: 2.5 feet

The assertion that the value of 4.7 feet appears to be too high for the random fill at 95% of Standard Proctor dry density can be demonstrated from a number of sources. Figure 2.2 in the Revised ICTM Report (Denison Mines 2010) provides a "generalized" cross-sectional view of the cover system for the site and gives the purported general cover design is as follows:

Topsoil rock mulch: 0.5 feet thick.

Random fill at 85% of Standard Proctor dry density: 3.5 feet

Random fill at 95% of Standard Proctor dry density: 2.8 feet

Grading fill at 80% of Standard Proctor dry density: 2.5 feet

The random fill at 95% of Standard Proctor dry density has a thickness listed above of only 2.8 feet, not 4.7 feet. The REC plan (Denison Mines 2011) offers similar information, but with the thickness of random fill at 95% of Standard Proctor dry density being said to be only 2.5 feet. However, this generalized cross-sectional view of the cover system also is considerably different compared to plans for actual constructed thicknesses in Cells 2 and 3. To obtain a more accurate value for planned thickness of random fill at 95% of Standard Proctor dry density, it is necessary to turn to the engineering drawings. A check can be made of the value used in the liquefaction analysis by comparing it against "compacted cover" values shown for Cell 2 in Sheet TRC-7 of the REC Plan, Revision 5.0 (Denison Mines 2011). Sheet TRC-7 is titled, "Cover over Cell 2 Cross Sections." These cross sections of the planned Cell 2 cover system show a maximum thickness for the "compacted cover", representing the random fill at 95% of Standard Proctor dry density, of about two feet. However, that exists only in a few places. Cross Section A shows only about 40% of the cell along that cross-sectional line having any "compacted cover" whatsoever, with an average thickness of only about one foot where that "compacted cover" does exist. About 60% of the cell along Cross Section A has no cover of 95% of Standard Proctor dry density at all.

Cross Section B shows only about 25% of the cell along that cross-sectional line having any "compacted cover" of 95% of Standard Proctor dry density whatsoever, with an average thickness of about one foot where the compacted soil does exist. 75% of the cell along that cross section has no "compacted cover" of 95% of Standard Proctor dry density at all. Cross Section C shows only about 25% of the cell along that cross-sectional line having any "compacted cover" of 95% of Standard Proctor dry density whatsoever, with an average thickness of one foot or less where the "compacted cover" exists. Sheet TRC-2 also confirms this, but in plan view. Cross Section C shows about 75% of the cell along that cross-sectional line with no cover having 95% of Standard Proctor dry density at all.

Assuming that the cross-sections provide a representative cross-sectional view of the cover system in Cell 2, it appears that, on average, to a rough approximation (assuming that each cross-section represents one-third of the cover), coverage of the cell by any 95%-of-Standard-Proctor "compacted cover" at all exists on only a little more than $[(0.333)(0.40) + (0.333)(0.25) + (0.333)(0.25)] = 0.3$, or three-tenths (3/10), of the cell. The average thickness of "compacted cover" at the cell, averaged over the cell's entire area, is thus only about $(0.3)(1 \text{ ft}) = 0.3 \text{ ft}$.

The liquefaction analysis sheet uses a value for the thickness of "compacted cover" having 95% of Standard Proctor dry density that happens to be $[(4.7 - 0.3)/0.3] \times 100\% = 1470\%$ in excess of the actual

value. In other words, the thickness of the random fill at 95% of Standard Proctor dry density assumed in liquefaction analysis is 15.7 times that value. Please address these inconsistencies in the liquefaction analysis spreadsheet calculations and provide correct values for the thickness of the random fill at 95% of Standard Proctor dry density.

Apart from issues associated with characterization of the cover system components, the liquefaction analysis spreadsheet calculations presented in Attachment F indicated a tailings surface elevation for Cell 2 of 5613.5 feet. 5613.5 feet is the approximate surface elevation for much of the tailings in Cell 2. However, tailings in the vicinity of Cross Section C in Cell 2 have much higher elevations in the northern half of the cell. There, the elevations reach to 5623 feet. Also, the liquefaction analysis spreadsheet calculation shows that the water surface elevation for Cell 2 is 5593.03 ft amsl. For of the second quarter of 2012, on May 29th, the reported depth to water in the tailings slimes in Cell 2 was measured as 21.10 ft (EFR 2012). The top of slimes drain pipe is at an elevation of 5618.73 ft amsl (personal communication with Russ Topham of the Division on October 5, 2012, who reported receiving it from Garrin Palmer of EFR on October 5, 2012). So, the calculated head of water in the tailings is estimated to be 5618.73 ft amsl minus 21.10 ft, or 5597.63 ft amsl. This is 4.6 feet higher than what is shown in the liquefaction analysis sheet. These values should be corrected.

As is the case for Cell 2, so it is for Cell 3 that actual planned thicknesses of various layers at different percentages of Standard Proctor dry densities, or at different compactions, greatly vary from what the liquefaction sheet shows. Sheet TRC-6 in the REC Plan (Denison Mines 2011) demonstrates this. Please fix the stated thickness values. Also, since the errors in thicknesses translate to errors in calculated normal stresses induced by cover systems in the various cells, and other calculations on the liquefaction analysis sheet, please be sure that these are fixed as well.

The liquefaction analysis spreadsheet calculations identify the tailings thickness for Cell 2 as 32.5 feet, that for Cell 3 as 38.5 feet, and that for Cells 4A/B as 40.5 feet. Table F.1 of Denison Mines 2011 is cited. Table F.1 and the Attachment F-2, Settlement Analysis spreadsheets in Denison Mines 2011 likewise provide figures of 32.5, 38.5 and 40.5 feet for the tailings thicknesses for Cells 2, 3, and 4A/B, respectively. These figures, however, appear to conflict with the tailings thickness for Cells 2 and 3 given on Page C-2 of the Response text of "approximately 30 feet" and "the tailings thickness for Cells 4A/B of approximately 42 feet" (Denison Mines, 2011). These inconsistencies should be fixed.

It can be seen, based on 1980 as-built drawing information from Energy Fuels Nuclear, Inc., as shown on Sheet TRC-7 of Denison Mines (2011) that, for most of the Cell 2, the elevation of the tailings surface is 5613 ft amsl. This knowledge, coupled with some additional information, can lead to a better understanding of maximum saturated thickness in the tailings of Cell 2. Assuming for the moment that the Denison Mines (2011) Table F.1 32.5 feet value is correct, this means that the nominal base of the tailings must be, on average, at about 5613 ft amsl minus 32.5 feet, or 5580.5 ft amsl. Since, as calculated above, the head of water in the tailings is 5597.63 ft amsl, it follows that the average saturated thickness of the tailings in Cell 2 is 5597.63 ft amsl minus 5580.5 ft amsl, or 17.1 feet. This compares with a value of 12.03 feet claimed for maximum saturated thickness in the liquefaction sheet. The latter number appears to be off by 5.07 feet, which would be a 30% error. This may substantively change a number of liquefaction calculations. Please correct the saturated thickness in the liquefaction sheet.

From the previous calculations for Cell 2, it is observed that the saturated thickness is about 30% greater than claimed in the liquefaction analysis. This has effects on calculations for effective overburden stress and other consequent calculations. These effects can be accounted for to some extent. The saturated zone starts about 4.5 feet higher than shown on the liquefaction analysis sheet, at approximately 5597.63 ft amsl, not at 5593.03 ft amsl. This means that 4.6 feet of tailings must be accounted for with a 120.3 pcf saturated specific weight compared to old approach of (if that 4.6 feet of tailings is assumed to have a moist specific weight of 95.40 pcf). Secondly, it changes the values of effective stress at each deeper depth analyzed, since it also shifts the elevation vs. water pressure curve

up. The Division request that EFR please make appropriate changes to the effective overburden stress calculations, or justify not doing so, not only for Cell 2, but for other cells, as needed.

In summary, based on a review of the information provided and in consideration of the issues previously discussed, the Division finds that several of the issues identified in the Interrogatory remain unaddressed, and consequently, the Division is unable to assess the correctness of EFR's conclusions regarding performance of the tailings impoundment cells relative to liquefaction. In particular, no explicit discussion relating the results of the tailings dewatering analysis to the water levels used in the liquefaction analyses was presented. Also, parameters regarding the tailings characterization continue to be assumed (although now some are more conservatively selected) rather than being based on site-specific data. If assumed data are used, it should reflect the most reasonably conservative values possible. While adverse performance seems unlikely based on the relatively high factors of safety with respect to liquefaction potential currently calculated, there are enough inconsistencies in the analyses that further evaluation is merited.

Response:

EFRI conducted a tailings investigation of Cells 2 and 3 in October 2013 at the White Mesa Mill site to address the Division's comment for this interrogatory and Interrogatory 07/1 requesting collection of site-specific tailings data to supplement existing tailings data used settlement analyses. The results are presented in MWH (2015b). Liquefaction analyses have been revised to incorporate the additional site-specific tailings data, as well as the revised cover grading design, results of the recent site-specific probabilistic hazard analysis (presented in MWH, 2015a), and revised procedures for the liquefaction analysis. The revised analyses are provided in Attachment E, Settlement and Liquefaction Analyses, and will be included in the next version of the Updated Tailing Cover Design Report (Appendix D to the Reclamation Plan).

These revisions address the Divisions comments which include requests for (1) collection of site-specific tailings data to supplement exiting tailings data, (2) use of site-specific tailings data to evaluate liquefaction, (3) include use of results for most recent PSHA completed for the site (MWH, 2015a), and (4) revisions to liquefaction calculations and assumptions.

The results of the liquefaction analyses indicate the tailings are not susceptible to earthquake-induced liquefaction for reclaimed conditions.

References for Response

MWH Americas, Inc. (MWH), 2015a. White Mesa Mill Probabilistic Seismic Hazard Analysis Report. Prepared for Energy Fuels Resources (USA) Inc. April.

MWH Americas, Inc. (MWH), 2015b. White Mesa Mill Tailings Data Analysis Report. Prepared for Energy Fuels Resources (USA) Inc. April.

DIVISION'S ASSESSMENT OF EFR RESPONSES TO RD 1 INTERROGATORY WHITE MESA RECPLAN REV. 5.0; R313-24-4; 10CFR40, APPENDIX A, CRITERION 6; INT 10/1; TECHNICAL ANALYSES – FROST PENETRATION ANALYSIS

The May 31, 2012 EFR response and calculations and methodologies used for completing the revised frost depth analysis are considered acceptable, with the one exception described in the following paragraph.

The Division notes that in the revised infiltration and revised radon emanation modeling most recently completed by EFR, use of NRC-recommended adjusted porosity and bulk density values was not considered. The Division requests that EFR conduct a revised radon emanation modeling sensitivity analysis (as well as conduct a revised infiltration sensitivity analysis) for the approved final cover for a scenario that incorporates adjusted bulk density and porosity values (or adjusted appropriate other soil parameters in the infiltration analysis) for soils in the upper zone of the cover system potentially impacted by the predicted maximum frost penetration. Adjusted soil property values used in the simulations should either consist of adjusted values derived in a manner consistent with NRC recommendations for adjusting such properties in frost-impacted soils for radon flux emanation calculations (NRC 2003a, Section 5.1.3), or adjusted values derived/assigned in manner consistent with recommendations provided in Benson et al. 2011, whichever is more conservative for the respective simulations. (See also discussion in Section 1.3 of the Technical Memorandum, White Mesa Mill Site – Revised ICTM Report Review addressing EFR's Response to Rd 1 Interrogatory 01/1 on the Revised Infiltration and Contaminant Transport Modeling Report).

The final revised Appendix B to Appendix D will need to be reviewed, when available, to verify that the revised frost depth information has been incorporated. The final revised frost depth analysis completed once the final cover design has been approved Drawings will need to be reviewed, when available, to verify that the revised frost depth calculation has addressed elements included in this request and has appropriately addressed any changes in the cover design, as applicable. Because these revised documents were not submitted with the response, this interrogatory will remain open.

Response:

A workshop on April 30, 2013 with representatives from the DRC, DRC's contractor (URS), EFRI, MWH, and Dr. Craig Benson facilitated discussion on DRC's February 2013 review comments on the Reclamation Plan, Revision 5.0 (DRC, 2013b) and the revised Infiltration and Contaminant Transport (ICTM) Report (DRC, 2013a). During this meeting, Dr. Benson presented material properties for the proposed cover materials for White Mesa and compared this data to the range of design recommendations provided in NUREG/CR-7028 (Benson et al., 2011) and the database of pedogenic-altered values at the Alternative Cover Assessment Program (ACAP) sites. Discussion from this meeting is provided in the August 2015 EFRI response document to DRC's 2013 review comments on the ICTM (see response to Interrogatory 01/1 - Inconsistencies Between Revised ICTM Report and Reclamation Plan Rev 5.0). The hydraulic test results for the soils stockpiled at White Mesa are within the range of parameter values anticipated to occur long-term as noted by Benson et al. (2011). Based on this comparison, adjusting soil characteristics due to frost penetration or other potential pedogenic processes are not warranted. The physical and hydraulic properties of the relatively permeable cover soils at the emplaced conditions are close to long-term properties from pedogenic processes, are such that post-construction changes should be minimal.

The frost penetration analysis will be updated after approval of the conceptual final cover design is obtained from the Division. The frost penetration analysis requires revision to incorporate additional data collected from a site investigation conducted on April 19, 2012 to further evaluate cover borrow materials. It is anticipated that the results of the updated analyses will be similar to the analyses presented in Denison (2012), with a frost penetration depth on the order of 81 cm (32 in).

Reference for Response:

Benson, C.H. W.H. Albright, D.O. Fratta, J.M. Tinjum, E. Kucukkirca, S.H. Lee, J. Scalia, P.D. Schlicht, and X. Wang, 2011. Engineered Covers for Waste Containment: Changes in Engineering Properties and Implications for Long-Term Performance Assessment (in 4 volumes). NUREG/CR-7028, Prepared for the U.S. Nuclear Regulatory Commission, Washington, D.C., December.

Denison Mines (USA) Corp. 2012. Responses to Interrogatories – Round 1 for Reclamation Plan, Revision 5.0, March 12. May 31.

Utah Department of Environmental Quality, Division of Radiation Control (DRC), 2013a. Radioactive Material License (RML) Number UT 1900479: Review of September 10, 2012 Energy Fuels Resources (USA), Inc. Responses to Round 1 Interrogatories on Revised Infiltration and Contaminant Transport Modeling (ICTM) Report, White Mesa Mill Site, Blanding, Utah, report dated March 2010. February 7.

Utah Department of Environmental Quality, Division of Radiation Control (DRC), 2013b. Review of August 15, 2012 (and May 31, 2012) Energy Fuels Resources (USA), Inc. Responses to Round 1 Interrogatories on Revision 5 Reclamation Plan Review, White Mesa Mill, Blanding, Utah, report dated September 2011. February 13.

DIVISION'S ASSESSMENT OF EFR RESPONSES TO RD 1 INTERROGATORY WHITE MESA RECPLAN REV. 5.0; R313-24-4; 10CFR40, APPENDIX A; INT 11/1; VEGETATION AND BIOINTRUSION EVALUATION AND REVEGETATION PLAN

The Division finds that EFR has addressed, in part, the items included in the interrogatory and considerable useful new information has been provided. However, some additional information is still needed to complete the responses, as described in the following paragraphs.

EFR presented results of the vegetation survey in summary fashion and provided few details. Are there survey reports describing methods and results in greater detail? Is there data available for each transect location? Is there information on other plant species observed but that did not have cover recorded at the transect points? The vegetation survey results did not include an updated vegetation map or information on the current vegetation in the reclamation cells. The map in the September 2011 Reclamation Plan (Revision 5.0) is clearly inconsistent with the results of the vegetation sampling reported in the August 15, 2012 Responses to Interrogatories, in that 19.1% big sagebrush cover was found at sample sites that are located in areas shown in Figure 17-1 as reseeded grassland and controlled big sagebrush. Information should have been provided on the current vegetation of the reclamation cells. The information provided does not provide an adequate account of current vegetation or an explanation of the successional processes that have occurred following previous disturbances and reclamation efforts.

Attachment G provides an updated seed mix, which now includes galleta. The total seeding rate in Table D.1 needs to be corrected to be 22.5 lbs PLS/acre. A column of PLS/square foot should be added to this table (this information was previously provided for most species in the September 2011 Appendix J Reclamation Plan). This mix is now correctly characterized as containing both native and introduced species.

Information was provided on the ecological characteristics of each of the species in the seed mix. However, no information was provided regarding past success or failure with these species at the site during interim reclamation. Previous revegetation experience at the site and changes in composition and cover over time, if available, need to be presented in order to support the predicted cover percentages.

Table D.4. Please provide more explanation as to how the values in this table were derived.

Table D.9 provides levels of soil properties for stockpiled soils compared to sustainable levels reported in the literature. These "sustainable levels" may or may not be achievable or sustainable over a long term within the study area, depending on its environment. To help determine realistic long-term expectations, soil properties should also be measured at reference areas. To what extent will establishment of grassland vegetation contribute to developing soil properties supporting sustainable vegetation?

The description of organic matter and nutrient amendments lacks sufficient detail. Provide more information regarding quantities, potential sources, and suitability for sustained growth?

How will institutional control be used to exclude grazing by livestock for the performance period?

Weeds and weed management should be addressed. It is noted that a significant portion of the vegetation over in the sagebrush areas surrounding the White Mesa Mill Site comes from cheatgrass and Russian thistle, and that cheatgrass and jointed goat grass initially dominated revegetation areas at Monticello.. What other weeds occur in the area or may occur in the future? Use of a mix of hay and manure to provide soil organic matter could introduce weeds.

Section D.4.5. of Attachment G , Supporting Documentation for (Rd 1) Interrogatory 11/1 (Revised Appendix D to the Updated Tailings Cover Design Report), first sentence indicates that "monitoring of an alternative cover at the Monticello Mill Tailings Disposal Site showed that the plant cover performed well over a seven year period." The last phrase "plant cover performed well over a seven year period"

should be reworded because although cover goals for grasses were met later in the 7-year period, cover goals established for the Monticello cover for shrubs species were not achieved despite significant shrub planting efforts in 2000 and in 2007 (e.g., see Sheader and Kastens [undated] circa 2007). Please provide a reference for the statement that eight species provided 70% of the plant cover at Monticello. The text in Revised Appendix D does not provide an indication of the percentage vegetative cover comprised by weedy species including weedy cheatgrass and Russian Thistle over that time period at Monticello and does not discuss how these species may affect cover revegetation goals (evapotranspiration capabilities) established for the Monticello or White Mesa cover systems.

Section D.7.2 addresses succession, including increase in sagebrush cover. The discussion should acknowledge the establishment of big sagebrush and other shrubs on former seeded grassland and controlled sagebrush areas north of the Mill Site in the 35 years since the original vegetation study, and discuss its relevance to the revegetation plan. The discussion indicates that warm season grasses are expected to increase over time. Is there an existing vegetation community in the region similar to that which is expected to develop? The discussion also mentions pulse-dominated precipitation – are there expected changes in seasonality of precipitation? An explanation should be provided as to why shrub species that occur just south of, and at lower elevations than the tailings management areas location, , such as four-wing saltbush, shadscale, blackbrush, and Mormon tea, would not increase under potentially warmer and dryer future climate conditions at the site.

The Reclamation Plan (or revised Infiltration and Contaminant Transport Report) needs to provide: (1) definition of clear, concise, and measurable revegetation acceptance goals/criteria for the vegetation establishment on the tailings cell cover system, (2) a description of how EFR will conduct periodic post-closure monitoring and reporting to the Division of the vegetation community health, viability, success, and sustainability, (3) a description of proposed action plans, schedules and deadlines for remedial actions if/when needed to effectuate plant community success, and (4) similar follow-up monitoring of the plant community/cover system to ensure successful performance before release of the facility's surety bond and/or transfer of title to DOE. EFR should describe specific, quantitative goals for shrub establishment (including rooting depths and minimum acceptable shrub cover percentages) that consider the need for deeper rooted plants to remove water that may accumulate lower in the cover profile in response to an exceptionally wet year or successive wet years, especially given the lack of a capillary break layer in the currently proposed cover design. In developing these descriptions, plans, and goals, EFR should consider and address lessons learned from the post-closure monitoring and maintenance activities and/or corrective revegetation measures required at the Monticello, Utah tailings repository and other similar facilities in this regard (e.g., Waugh 2008; Sheader and Kastens undated, circa 2007; U.S. DOE 2007; Sheader and Kastens [undated, circa 2007). EFR should assess the potential applicability and benefits of using vegetation health monitoring tools/metrics such as the Cover Vegetation Index recently implemented at the Monticello Repository (U.S. DOE 2009).

The Reclamation Plan should describe corrective measures that may be needed to address/correct issues related to: (1) establishment of undesirable species, e.g., colonization by certain undesired grass/weedy species that may have more limited water stress tolerance than initially seeded grass species and/or that may outcompete planted grass species unless controlled (e.g., Smesrud et al. 2012; Sheader and Kastens [undated, circa 2007]); (2) Seed predation following seeding/reseeding efforts; (3) Possible low success rates resulting from shrub establishment efforts, etc.... Estimated costs for conducting these post-closure activities, corrective actions, and reporting, once approved by the Division, will need to be incorporated in the financial surety estimate.

The Revised Attachment G provided by EFR as part of its Response presents the results of a June 1012 burrowing animal survey (Section D.5.3). However, as described above, the results are presented in summary fashion and few of the necessary details are provided. Are there survey reports describing methods and results in greater detail? Is there data available for each transect location? Does badger

burrow density include feeding areas (dug-out prey burrows)? The reported burrow density for badger appears very low. Additional information about potential burrow densities should be provided based on a review of the literature. The analysis should consider both burrows dug by badgers for their own use and digging while hunting.

Little information is presented on burrow densities, other than Gunnison prairie dog. Results for Gunnison prairie dog are based on the June 2012 survey and do not consider literature values. Information on burrow densities for Gunnison prairie dog should be summarized by transect and the locations of prairie dog towns marked on a map. The results need to be put in context by reference to literature, for example Lupis et al. 2007, considering both regional densities, predicted range and habitat suitability. The statement in Attachment D that prairie dogs are unlikely to occur because they prefer low plant cover and short vegetation is not consistent with the description of habitats where they occur in southeastern Utah in Lupis et al. 2007. Most of the grass species included in the seed mix are reported to occur in grassland habitat occupied by this species in southeastern Utah. They also occupy desert shrub habitats.

Table D.8. Ranges of depths for burrowing mammals mostly not provided, just maximum depth, and based on a single citation per species. The “maximum” depth for Gunnison’s prairie dog of 122 cm from Verdolin et al 2008 should be correctly characterized as an average depth reported from several studies. The actual maximum (mean plus 1 SD) reported by Verdolin et al. 2008 appears to be 1.85 m. All of the numbers in this table should be revisited to provide a range of maximum values reported in the literature and to determine whether the maximum has been accurately stated.

Table D.6 and discussion. There is literature indicating that big sagebrush can root to depths considerably below 180 cm. Please address and further explain this finding/statement. Rooting depths of other shrubs that may occur should also be considered.

Additional information needs to be presented to justify that the highly compacted zone will minimize biointrusion by plant roots. Consider moisture conditions, potential degradation when dry, behavior of roots related to soil moisture and gas exchange, and other factors. Cite previous studies or observations of root growth relative to compacted soils.

Response:

Vegetation on previously revegetated areas at the Mill site has not been evaluated. This information would have limited value in evaluating the proposed reclamation plan or in determining if future reclamation will produce a sustainable plant community on the tailings cells. The proposed reclamation plan is substantially different than previous reclamation efforts in terms of soil cover, soil amendments and species to be planted, such that any comparisons would not provide any predictive value. The only reclamation that has occurred at the Mill site was seeding of Cell 2 in 2011. Seeding only included crested wheatgrass (*Agropyron desertorum*) and no evaluations have been conducted since seeding occurred.

Further details of the 2012 vegetation survey are provided in a revision of Appendix D (Vegetation and Biointrusion Evaluation) to the Updated Tailings Cover Design Report (Appendix D of the Reclamation Plan, Revision 5.0). The revised Vegetation and Biointrusion Evaluation appendix is provided as Attachment G.1 to this response document.

A map of current vegetation at the Mill site does not exist. The most recent mapping of vegetation at the Mill site was conducted by Dames and Moore in 1977 (Dames and

Moore, 1978) as part of the Environmental Report for the White Mesa Uranium Project. Further discussion of mapping units from 1977 and the 2012 survey is presented in Attachment G.1.

An updated seed mixture that includes number of seeds/square foot and the addition of shrub species is presented in Attachment C.1, Attachment G.1, and Attachment G.2. Attachment C.1 is revised Technical Specifications to the Reclamation Plan, Revision 5.0. Attachment G.1 is as described previously. Attachment G.2 is a revised Appendix J (Revegetation Plan) to the Updated Cover Design Report (Appendix D of the Reclamation Plan, Revision 5.0).

The species in the proposed seed mixture have not been used on site, so there is no information available regarding success or failure with these species at the site during interim reclamation efforts. However, there are decades of revegetation research using these species in semiarid regions of the western U.S. along with tens of thousands of acres that have been successfully reclaimed with these species. The plethora of information that exist on the use of these species for disturbed land reclamation provides ample evidence that these species are adapted to the environmental conditions of the Mill site and are highly likely to lead to successful reclamation. As stated above, the only reclamation that has occurred at the Mill site was seeding of Cell 2 in 2011 with crested wheatgrass, and no evaluations have been conducted since seeding occurred.

Further explanation of LAI values and how numbers were derived are presented in Attachment G.1.

No reference areas have been previously established to provide information on soil properties to document that sustainable levels are achievable. However, soil that will be used as cover material on the tailings cells has been evaluated, and was included in Attachment G of EFRI (2012) as Table D.9 (EFRI, 2012). An update of this table is included as Table D.38 in Attachment G.1 to this response document. This table includes physical and chemical properties of the soil and also levels reported in the literature that would be considered sustainable. Soil properties that appear deficient and would need improvement to achieve sustainability include: percent organic matter, total nitrogen, and extractable potassium. Amendments would be applied during reclamation to address these deficiencies and this application is discussed Attachment G.1. Over time, the soil-forming process of pedogenesis will continue as climate and on-site organisms (primarily plants and the soil microbial community) modify the soil over time. This process would include the addition of organic matter in the form of composted biosolids which will improve soil structure, water holding capacity, cation exchange capacity, buffering capacity, and overall soil fertility. All of the benefits will lead to a more productive soil and greater sustainability.

Further details on the use of an organic amendment including type, rates of application, source of material, and potential benefits are presented in Attachment G.1. Revised specifications for soil amendments are provided in Attachment C.1.

Existing restricted fencing of the site will be used as an institutional control to exclude grazing by livestock for the performance period.

A weed management plan is presented in Attachment C.1 and Attachment G.1.

Cover goals for shrub species have not been met at the Monticello Mill Tailings Disposal site because of establishment issues related to big sagebrush and seedling damage caused by montane voles (*Microtus montanus*) (DOE, 2007). Attachment G.1 reflects this finding.

The statement that eight of the seeded species at the Monticello Mill Tailings Disposal site provided 70 percent of the plant cover was based on a progress report from Stoller. This finding has been modified and discussed further in Attachment G.1 using results from the 2007 vegetation monitoring report (DOE, 2008).

In the 2007 revegetation monitoring report at Monticello (DOE, 2008) the following was reported:

“Seed germination requirements for sagebrush and rabbitbrush are potentially pertinent in determining why these species did not establish well on the repository cover. Although the seeds of many species (e.g., most grasses) persist for years in the soil, rabbitbrush and sagebrush seeds persist for only one season. In addition, sagebrush seed may require cold stratification to germinate. It is unlikely that the seed was stratified by the supplier prior to shipment, and seeding was done in April 2000, after natural stratification would have occurred.”

In addition: “In 2000, the 3-month period immediately following seeding was exceptionally dry, and this may be the major cause of poor sagebrush and rabbitbrush seed germination. Grass and forb seeds, which persist longer in the soil, would have emerged later, when conditions were more favorable, and the presence of these seeded species indicates that this occurred.”

Low precipitation during a critical time of the year following seeding, competition from more mature vegetation, and damage caused by vole herbivory have been presented as reasons for low shrub density at Monticello (DOE, 2008; DOE, 2007).

Changes in the relative cover of common weed species at the Monticello site are summarized from previous monitoring reports (DOE, 2003, DOE, 2004, DOE, 2005a, DOE, 2005b, , and DOE, 2008) and presented in Table 1. These results demonstrate that weed species at the site remain well controlled.

Table 1. Changes in Weedy Species Over Time (Relative Cover Percentages, Zones A1 and B Combined from Monticello Disposal Cell Cover Revegetation (Taken from DOE 2008))

Species	2000	2001	2002	2003	2004	2005	2006	2007	2008	Trend
<i>Aegilops cylindrical</i>	---	---	---	0.8	---	1.9	---	---	0.1	Not abundant; not increasing
<i>Amaranthus bitoides</i>	8.1	1.7	0.8	---	---	---	0.5	---	---	Nearly eliminated after two growing seasons
<i>Bromus tectorum</i>	1.9	18.3	4.5	18.2	35.6	56.3	15.5	21.0	12.8	Abundant weed peak in 2005
<i>Chenopodium album</i>	4.6	2.9	4.2 1	2.4	0.2	---	0.5	---	---	Nearly eliminated after four growing seasons
<i>Convolvulus arvensis</i>	---	---	---	---	0.2	0.2	0.5	0.5	---	Not abundant; not increasing
<i>Lactuca serriola</i>	---	---	0.1	1.9	1.9	1.6	1.0	---	1.4	Not abundant; not increasing
<i>Salsola tragus</i>	36.0	69.9	48.2	33.3	8.2	0.1	6.5	---	---	Once abundant; nearly eliminated in 2007/2008
<i>Sisymbrium altissimum</i>	---	3.8	---	1.7	3.1	2.8	6.5	0.5	0.2	Not abundant; not increasing; peak in 2006

The following is taken from DOE (2008): "In Utah, weed law has recently been revised to reflect categories of weeds targeted for control. The main management goal for Category C weeds is not to eradicate the weed but to prevent its spread. Small quantities of *Convolvulus arvensis* (field bindweed), a Category C noxious weed, have been observed on the site since 2002, but this species has not spread. One San Juan County listed noxious weed, *Aegilops cylindrical* (jointed goatgrass) has been observed on the site since 2003 in small quantities and also has not spread. Another Category C noxious weed species, *Cirsium arvense* (Canada thistle), was observed and treated in 2006, and it has subsequently not been observed. One Category A noxious species, *Centaurea stoebe* ssp. *micranthos* (spotted knapweed) was discovered near the site's entrance gate and treated in 2008. Populations of *Acroptilon repens* (Russian knapweed), a Category B species, were treated near the office building in 2008. Neither of these noxious species has spread into the revegetated areas, and they will continue to be monitored and treated for eradication from the site. DOE will continue to monitor and manage the entire site, including portions of the site where vegetative success criteria have been met, for all noxious weed species."

Based on the success achieved at Monticello in controlling weeds, it is unlikely that the presence of weeds at the Mill site will negatively affect revegetation goals, and the proposed weed management plan will help ensure revegetation success.

Attachment G.1 includes modifications to acknowledge the establishment of big sagebrush and other shrubs on previously seeded grassland and controlled sagebrush areas north of the Mill site over the last 35 or more years, and a discussion has been included as to the relevance of this shrub response to the revegetation plan.

There are grassland steppe communities south of Bluff, Utah which is directly south the Mill site (CARTOKO, 2010). These semiarid grasslands are dominated by a variety of grama grasses, galleta, three awn (*Aristida spp.*), ring muhly (*Muhlenbergia torreyi*), and pungent muhly (*Muhlenbergia pungens*) (Banner 1992); all warm-season species.

The discussion of a potential climate shift to a pulse-dominated hydrology has been deleted (see Attachment G.1). However, in response to the question if there are expected changes in seasonality of precipitation with a shift to a pulse-dominated hydrology, we believe there may be a decrease in winter precipitation. Additional discussion is provided in Attachment G.1.

Regionally common shrub species from areas that are characterized by lower elevation and having climatic conditions that are warmer and drier than the Mill site would include fourwing saltbush (*Atriplex canescens*), shadscale saltbush (*Atriplex confertifolia*), blackbrush (*Coleogyne ramosissima*), and Mormon tea (*Ephedra viridis*).

Fourwing saltbush is one of the most widely distributed and important native shrubs on rangelands in the western United States including the Intermountain, Great Basin, and Great Plains regions (Welsh et al., 2003). Fourwing saltbush occurs most commonly in salt-desert scrub communities in the Great Basin, Mojave and Sonora Desert areas of western North America (Kearney et al., 1960; Welsh et al., 2003). In the Great Basin region it is often associated with black greasewood (*Sarcobatus vermiculatus*), black brush (*Coleogyne ramosissima*), big sagebrush (*Artemisia tridentata*), creosote bush (*Larrea tridentata*), rabbitbrush (*Chrysothamnus spp.*) and shadscale (*Atriplex confertifolia*) (Welsh et al., 2003).

Fourwing saltbush is adapted to most soils but is best suited to deep, well-drained; loamy to sandy to gravelly soils. It is very tolerant of saline soil conditions and somewhat tolerant of sodic soil conditions (Ogle and St. John, 2008).

Shadscale saltbush occurs throughout western North America from California and Oregon east to North Dakota and south to Arizona and Texas. The greatest concentrations of shadscale saltbush are found in the Great Basin and Colorado Plateau (Simonin, 2001). Shadscale saltbush can be found in warm desert shrub-steppe environments. Populations occur in low valleys, foothills and mesas from 2,500 to 7,500 feet elevation (Simonin, 2001). It often grows in association with other halophytes including mat-atricplex, and greasewood, but can also be found in sagebrush and pinyon-juniper communities (McArthur and Monsen, 2004; Welsh et al., 2003). Shadscale saltbush is highly drought tolerant and is adapted to sites receiving 6 to 12 inches of annual precipitation. This species is tolerant of high saline conditions (pH 7.5-9.0) and is classified as a facultative halophyte (Branson et al., 1976). It prefers well-drained soils but may inhabit a wide range of soil textures from fine to gravelly.

Blackbrush occurs primarily in the transition zones in Great Basin deserts. It is found at elevations from 2,500 to 7,000 feet in areas where the annual temperature fluctuation can range from -11 degrees to 116 degrees Fahrenheit. It is drought-deciduous, meaning that it avoids water stress by becoming temporarily dormant and then shedding its older leaves as stress intensifies during the dry season. Spiny stems, coupled with chemical compounds in current year's growth, protect blackbrush from heavy browsing. It is adapted to dry and well-drained soils and is most abundant in sandy, gravelly, and rocky soils.

Green ephedra occurs on rocky or sandy slopes and plains in such plant communities as the juniper-pinyon woodland, the sagebrush desert, creosotebush deserts, and the desert grassland from 3,000 to 7,000 feet elevation (Benson and Darrow, 1981). Common associates include creosotebush (*Larrea tridentata*), shadscale saltbush, fourwing saltbush, big sagebrush, galleta, and sand dropseed (*Sporobolus cryptandrus*). Green ephedra is tolerant of calcareous, weakly saline, and slightly saline-alkaline (sodic) sites. It thrives in dry, well-drained sites and it is intolerant of wet sites and poor drainage. The plant is drought-resistant.

Based on this discussion of ecological characteristics of common shrub species from sites of lower elevation than the Mill site it is certainly possible that any one of these shrubs could occur at the Mill site if the future climate was warmer and drier than the present.

Attachment C.1 and Attachment G.1 include information on revegetation acceptance goals/criteria that include shrub establishment goals. Lessons learned from post-closure monitoring at Monticello have been incorporated (see Attachment G.1).

A post-closure monitoring plan has been added and is included in Attachments C.1 and G.1.

Quantitative goals for sustained shrub establishment are described in Attachment C.1 and Attachment G.1 and include the establishment of a minimum of 500 stems per acre. Two shrub species, fourwing saltbush and rubber rabbitbrush (*Ericameria nauseosa*), have been added to the proposed seed mixture. Both species have the potential for deep root penetration (e.g. six meters) when soil conditions allow (Kearney et al., 1960) but are not expected to root into the compacted radon attenuation layer because the targeted bulk density of the compacted zone of 1.8 g/cm² will inhibit root penetration (Mimore et al. 1969; Heilmen, 1981; and Zisa et al., 1980).

There is no further detail on the burrow animal survey that was conducted at the Mill Site in 2012. Estimates of burrow densities for both badgers and prairie dogs have been placed in context of literature values in Attachment G.1.

Burrowing depths have been revised and are presented in Attachment G.1.

Rooting depths have been revised and include shrub species and are presented in Attachment G.1.

Further discussion is presented in Attachment G.1 on soil compaction and root growth.

References for Response

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DIVISION'S ASSESSMENT OF EFR RESPONSES TO RD 1 INTERROGATORY WHITE MESA RECPLAN REV. 5.0; R313-24-4; 10CFR40, APPENDIX A, CRITERION 6(4); INT 12/1; REPORT RADON BARRIER EFFECTIVENESS

The Division's assessment of the Response follows below:

As with a number other responses, EFR has deferred final resolution of issues to its submission of the next revision of the Reclamation Plan. The Division requests that EFR please submit the next revision of the Reclamation Plan that incorporates all changes proposed in the license amendment request.

EFR's responses leave unresolved the following issues regarding radon flux modeling:

- 1. The dependence of Radon emanation and diffusion coefficient on long-term moisture content (raised in Item d of INT 12/1) is not but should be addressed. Please address this dependence. [Note: The Division notes that the radon diffusion coefficient used in the revised radon emanation analysis for the tailings is higher (by about a factor of 3) than the diffusion coefficient value assumed in radon emanation analyses completed for a similar tailings disposal facility (Monticello Tailings Repository) in Utah (e.g., NRC 2008). The value used in the Monticello analysis was derived using a different procedure (Rogers and Nielson 1991) than was used by EFR. Using a higher radon diffusion coefficient in the radon emanation analysis represents a more conservative assumption.]*
- 2. The summary of values used for long-term moisture content does not adequately explain the work presented in Attachment H, Attachment C.2. This lack of supporting interpretation basis leaves unresolved the conclusion that the values used in Radon modeling are conservative. Please complete the discussion of values of long-term moisture content used in Radon modeling.*
- 3. Values summarized in Table C-4 for diffusion coefficients are inconsistent with those appearing in Attachment H, Attachment C.3. Please resolve this inconsistency*
- 4. All calculated Radon fluxes from the surface of the cover system (Layer 5) exceed 20 pCi/cm²-s, albeit by very slight amounts. Please address the apparent failure of the proposed cover system design to satisfy the regulatory constraint for Radon flux.*

Response:

The radon emanation modeling has been revised to incorporate updated radon diffusion coefficients and additional site-specific tailings data collected in October 2013 (MWH, 2015). The revised analysis is provided in Attachment H as part of the revised Appendix C, Radon Emanation Modeling, which will be included in the next version of the Updated Tailings Cover Design Report (Appendix D to the Reclamation Plan).

The radon emanation coefficients used in the radon emanation analysis were selected using procedures recommended in NUREG-1620 (NRC, 2003). The radon emanation coefficient was selected as 0.20 for the tailings based on recommendations in NUREG-1620 (NRC, 2003) that states a "value of 0.20 may be estimated for the tailings based on the literature, if supported by limited site-specific measurements." The radon emanation coefficient for the cover layers was selected as the conservative default value used in the RADON model of 0.35.

The diffusion coefficients for the tailings and cover layers for the radon emanation modeling results provided in EFRI (2012) were calculated based on the empirical relationship by Rogers and Nielson presented in NRC (1989). This relationship is dependent upon porosity and the degree of saturation and was based on approximately 100 radon diffusion coefficient measurements. The diffusion coefficients for the tailings and cover layers have been revised to be calculated using the empirical relationship presented in Rogers and Nielson (1991). This relationship is an update to the one presented in NRC (1989) and was developed from over 1,000 radon diffusion coefficient measurements. The porosity and degree of saturation were calculated based on the long-term densities and long-term moisture contents presented in Attachment D.

MWH collected representative samples from the on-site random fill and topsoil stockpiles for use in estimating the long-term moisture contents for the cover layers. The laboratory results for the 15 bar water contents for these samples were used to estimate long-term water contents for the random fill and erosion protection layers. NRC (2003) recommends use of 15 bar water contents to estimate long-term water contents for use in radon emanation modeling.

The long-term water content of the topsoil was estimated as 5.2 percent based on the measured 15 bar gravimetric water content for a topsoil sample (E1-A) which represents the average index properties for the topsoil stockpiles (UWM, 2012). The long-term water content of the rock mulch was estimated as 4 percent based on the addition of 25 percent gravel by weight to the topsoil.

Based on the cover material gradations, the cover soils were bracketed into three groups, finer grained soils, uniform graded soils, and broadly graded soils. A weighted average procedure that accounted for the relative volumes of each soil type (based on the stockpile volumes) was incorporated to determine the average long-term gravimetric water content for the random fill using the measured 15 bar water contents. Data used for estimation of the long-term water content value for the cover material is provided in Attachment D.

All calculated rates of radon emanation from the surface of the cover system are below the limit of 20 pCi/m²-sec.

Reference for Response:

Energy Fuels Resources (USA) Inc. (EFRI), 2012. Responses to Interrogatories – Round 1 for Reclamation Plan, Revision 5.0, March 2012. August 15.

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DIVISION'S ASSESSMENT OF EFR RESPONSES TO RD 1 INTERROGATORY WHITE MESA RECPLAN REV. 5.0; R313-24-4; 10CFR40, APPENDIX A, CRITERION 6(6); INT 13/1; CONCENTRATIONS OF RADIONUCLIDES OTHER THAN RADIUM

To further resolve remaining issues pertaining to concentrations of radionuclides other than radium in soil, the Division requests that EFR please do the following:

- 1) *Provide justification (either data or references to data) to support EFR's determination of U-nat and Th-230 background concentrations.*
- 2) *Incorporate a description of how EFR's site-specific sampling program will be used to determine background concentrations for radionuclides other than Ra-226 into EFR's documentation of how MARSSIM will be implemented and submit for the Division's review.*
- 3) *Incorporate a description of how EFR will use the "sum rules" for surface and subsurface soils into EFR's documentation of how MARSSIM will be implemented and submit for the Division's review.*
- 4) *Incorporate a description of EFR's plan for using radiation measurement instrumentation for soil background analyses, radium-gamma correlations, verification data, and sensitivity analyses into EFR's documentation of how MARSSIM will be implemented and submit for the Division's review.*
- 5) *As suggested in Item 4 of INT 13/1, please incorporate into documentation relating to how MARSSIM will be implemented, descriptions of the following:*
 - ✓ *Calibration procedures*
 - ✓ *Instrument testing*
 - ✓ *Detection limits of sample analyses*
 - ✓ *Extent of expected contamination*
 - ✓ *Limits of gamma survey*
 - ✓ *Verification of the soil-radium gamma correlation*

Response:

1) The U-nat and Th-230 background concentrations submitted in earlier interrogatories (EFRI Round 1 response to 13.2) are solely interim background values, and will not be used to guide the remediation process.

The mean background data over 24 years of annual sampling from the mill background sampling station, BHV-3, is 0.78 pCi/g for U-238 and 0.93 pCi/g for Ra-226. These results are comparable to other background sampling locations off site. Ra-226 concentrations have been reported as 1.1 pCi/g near the airport entrance south of Blanding, and 0.83 pCi/g southeast of Crescent Junction (Myrick et al., 1981). U-238 values have been reported as 0.94 pCi/g near the airport entrance south of Blanding, and 0.78 pCi/g U-238 southeast of Crescent Junction (Myrick et al, 1981). These values are shown in Table 1 below. No comparable Th-230 background data has been found from the mill's data or from reference documents.

Table 1. Reported Background Concentrations

Location	Ra-226 (pCi/gram)	U-238 (pCi/gram)
BHV-3	0.93	0.78
Airport Entrance	1.1	0.94
SE Crescent Junction	0.83	0.78

Background values provided in the earlier interrogatories (1.9 pCi/g U-nat and 0.93 pCi/g Th-230 based on equilibrium with the Ra-226 value of 0.93 pCi/g) are interim values. No further investigation is necessary for remediation purposes until background reference areas are established during the remediation process. A systematic soil sampling program will be conducted in an area within 3 miles of the site, similar to the areas to be remediated, to determine the average background radionuclide concentrations to ultimately be used for the cleanup. Similarity or representativeness will be determined based on geology, geomorphology, soil type and soil chemistry. The background will be determined at the beginning of reclamation.

According to MARSSIM 4.5 (NRC, 2000), a site background reference area should have similar physical, chemical, geological, radiological, and biological characteristics as the survey unit being evaluated. Background reference areas are normally selected from non-impacted areas, but are not limited to natural areas undisturbed by human activities. In some situations, a reference area may be associated with the survey unit being evaluated, but cannot be potentially contaminated by site activities. For example, background measurements may be taken from core samples of a building or structure surface, pavement, or asphalt. The Division will be consulted during selection of proposed background sample locations.

2) A description of how EFRI's site-specific sampling program will determine background concentrations for radionuclides other than Ra-226 has been incorporated into revised sections of the Reclamation Plan which discuss the implementation of MARSSIM guidance. Please refer to Section 6.3, and Section 6.3.2 of the revised Technical Specifications (provided as Attachment C.1 to this document).

3) A description of how EFRI will use the "sum rules" for surface and subsurface soils has been incorporated into revised sections in the Reclamation Plan which discuss the implementation of MARSSIM guidance. Please refer to Section 6.6.3.3 of the revised Technical Specifications (provided as Attachment C.1 to this document).

4) A description of EFRI's plan for using radiation measurement instruments for soil background analyses, radium gamma correlations, verification data and sensitivity analyses has been incorporated into revised sections in the Reclamation Plan which discuss the implementation of MARSSIM guidance. Please refer to Section 6.3.2 of the revised Technical Specifications (provided as Attachment C.1 to this document).

5) The Technical Specifications in Attachment A of the Reclamation Plan have been revised to incorporate how MARSSIM guidance will be implemented during reclamation. The revised Technical Specifications are provided as Attachment C.1. Specific subsections of the Technical Specifications, Section 6 have been modified as follows:

- *Calibration procedures*
 - See Section 6.5.1 of the revised Technical Specifications.
- *Instrument testing*

- Instruments will be QC's using Exhibit A-1 incorporated into the revised Technical Specifications.
- *Detection limits of sample analyses*
 - See Section 6.7.1 of the revised Technical Specifications.
- *Extent of expected contamination*
 - See Section 6.6.3.1 of the revised Technical Specifications.
- *Limits of gamma survey*

The gamma radiation survey will be limited by the minimum detectable concentration (MDC) for the 2-inch x 2-inch sodium iodide (NaI) scintillometer, which is approximately 104 Bq/Kg (2.8 pCi/gram) for Ra-226, according to MARSSIM Table 6.7. This MDC depends on the background, which may raise or lower the MDC. Remediation will be primarily driven by Ra-226, which is the contaminant with the most restrictive cleanup standard as determined in the SENES Consultants, Inc. letter to EFRI dated August 15, 2012. This letter was provided as Attachment I to EFRI's Supporting Documentation for Response to Utah DRC Interrogatory 13/1 (SENES, 2012).

Table 2. Reported MDC's from MARSSIM Table 6.7

Nuclide	MDC (Bq/kg)	MDC (pCi/gram)
U-Nat	2960	80
Th-230	78,400	2100
Ra-226 (with decay products in equilibrium)	104	2.8

- *Verification of the soil-radium gamma correlation*
 - See Section 6.6.3.6 and Section 6.6.3.7 of the revised Technical Specifications.

References for Response

- Myrick, T.E., B.A. Berven and F.F. Haywood, 1981. State Background Levels: Results of Measurements Taken During 1975-1979, ORNL/TM-7343.
- SENES, 2012. Letter to J.A. Tischler, Energy Fuels Resources, Inc. Radium Benchmark Dose Approach. August 15, 2012, as provided in EFRI Responses to Utah DRC Interrogatories Round 1. August 2012.
- United States Nuclear Regulatory Commission (NRC), 2000. Multi-Agency Radiation Survey and Site Investigation Manual. NUREG-1575. August.

DIVISION'S ASSESSMENT OF EFR RESPONSES TO RD 1 INTERROGATORY WHITE MESA RECPLAN REV. 5.0; R313-24-4; 10CFR40, APPENDIX A; INT 14/1; COVER TEST SECTION AND TEST PAD MONITORING PROGRAMS

The Division has a concern that comparing the performance of the proposed ET cover at the White Mesa Mill Site to the performance of the Monticello tailings repository cover system is inappropriate, for several reasons. For example, the cover system at Monticello is a composite system (having several types of highly-specialized layers designed to accomplish various physical objectives). More specifically, the cover system at Monticello differs significantly in design and operation from the currently selected monolithic cover system proposed for White Mesa in that (1) the Monticello cover system includes an animal intrusion barrier (consisting of cobbles at about 1 m (~ 3 feet) of depth), and (2) a capillary barrier (at ~ 1.6 to 2 m, located below the animal intrusion barrier, below another layer of soil, and just above the radon barrier). Each of these cover system components provide important functions not accomplished in the currently-proposed monolithic soil ET cover design for White Mesa.

In addition to differences in design between the Monticello repository cover and the proposed ET cover for the White Mesa Site, there are fundamental differences in the properties of the soils used to construct the Monticello cover compared to the soils currently proposed for use in constructing the ET cover at White Mesa. For instance, soils proposed by EFR for use in constructing the ET cover are extremely low in natural organic matter (OM) content, e.g., compared to soils that were used for constructing the Monticello Tailings Repository cover system e.g., zero to about 0.4 % according to Table D-5 in Appendix D of the Revised ICTM Report, compared to a recommended minimum OM content of from approximately 1.5 to 3.0%). These factors indicate that, given the natural climate conditions at the site (which could include possible prolonged (e.g., decadal to multi-decadal) future drought periods likely to create conditions unfavorable for sustaining plant growth in the cover), and without substantial and extensive OM enhancements incorporated into the soils prior to cover construction and possible periodic active post-closure intervention/maintenance measures such as reseeded, possible irrigation of the cover, etc..., the on-site soils tested to date appear to be unfavorable for use in constructing the ET cover (see also discussion in Section 2.3.1 of the Technical Memorandum, White Mesa Mill Site – Revised ICTM Report Review addressing EFR's Response to Rd 1 Interrogatory 02/1 on the Revised Infiltration and Contaminant Transport Modeling Report).

The Division also notes the following statements made by EFR in in the Revised ICTM Report (Denison Mines 2010):

- *On Page 4-2 in the Revised ICTM Report (Denison 2010), EFR states "Furthermore, results from nearby uranium mill tailings lysimeter at Monticello (Waugh et al., 2008) also agree with model predictions for the proposed cover system at White Mesa." The Revised ICTM Report proceeds to compare modeled infiltration rates at the proposed cover at White Mesa with measured infiltration rates associated with the Monticello cover.*
- *On Page 4-2 in the Revised ICTM Report (Denison 2010), EFR also states " The model-predicted infiltration rates for monolithic ET cover are consistent with data reported from lysimeter and infiltration modeling studies of other vegetated ET covers (e.g., Albright et al. 2004; Bolen et al. 2001; Fayer and Gee 2006; Gee et al., 1994; Scanlon et al. 2005).*

After referring to studies by Bolen et al. (2001), Albright et al. (2004), and others mentioned, the Revised ICTM Report states, "In summary, a monolithic ET cover is the preferred design to minimize infiltration necessary to meet the Permit (Part I.D.8) and meet the radon attenuation standard." However, the cover systems described in several of these cited references contain different design components, such as a capillary break, that are not included in the currently proposed ET cover. For example, Bolen et al. 2001

review ET cover systems at 12 sites. Unlike the proposed White Mesa cover system, a number of the 12 cover systems reviewed by Bolen et al. (2001) are reported to contain either a sand layer or a gravel layer of appreciable thickness, which may act as a capillary barrier/ capillary break. Albright et al. 2004, who discuss the same 12 sites, state that six of them have a capillary barrier/break layer. Also unlike the proposed cover system at White Mesa, however, nearly all (i.e., 10 of 12) of these sites have geosynthetic root barriers consisting of nonwoven geotextile containing lumps of slow-release trifluralin (herbicide-like plant root inhibitor) (see also Albright et al., 2004). Each barrier is installed between interim cover and the overlying final cover system. Trifluralin acts to prevent plant biointrusion into waste by interfering with root mitosis so that its use at a site can modify impacts of rooting, biointrusion and drainage through a cover system.

The other studies mentioned by EFR also refer to sites with cover systems having substantial differences from the proposed White Mesa site cover system. Fayer and Gee (2006), for example, describe performance of four types ET cover systems at the Hanford Lysimeter Test Facility at a semi-arid site in Hanford, Washington for periods of up to 17 years. Of interest here is that each type of cover system described incorporates a capillary barrier/break layer, as part of the “Hanford Barrier”, in some form.

The cover design for the Crescent Junction, Utah tailings repository (relocation repository facility for the Moab tailings) also contains a combination “Infiltration and Biointrusion” Barrier” underlying the frost protection component of the cover and overlying the radon barrier layer in the cover (see, e.g., DOE 2012, Addendum E, p. 14).

Several published studies demonstrate that incorporating a capillary barrier (with an adjacent granular filter layer) can substantially reduce cover infiltration rates. For example, a comparison of two otherwise similar cover systems (one monolithic with a thick soil cover, and one non-monolithic, with a capillary barrier) in terms of their ability to restrict drainage shows that the cover system with a thick soil cover was outperformed by the cover system having a capillary barrier by up to a ten-to-one ratio or greater (Porro 2001). Similar results were obtained in forced irrigation testing of alternative cover systems by Martian et al. 2001. Infiltration reduction depends on cover-system materials and environmental conditions. Hydraulic performance is evaluated as the probability that ET from the water-storage soil layer overlying the capillary break layer is sufficient to prevent water accumulation in the soil sponge layer from exceeding its storage capacity in any given year. The potential benefits in cover system infiltration performance with a capillary barrier are well documented.

For reasons described above, the Division also finds that the technical adequacy of a monolithic ET cover at the White Mesa site is not adequately supported by the comparisons EFR provides to other cover systems as described in technical references cited by EFR.

With respect to a Test Pad/Test Section, the Division believes that there is value in, and a need for, constructing and monitoring a pilot test pad or pilot test section prior to full-scale cover construction, and in a location off of the tailings. Information and benefits that can be gained from such pilot testing include:

- Helps establish/verify a performance standard for the cover;
- Validates the cover design and construction;
- Could result in suggestions for improved design features and construction methods when implementing the full-scale cover construction; and
- Helps to identify and resolve problems that may be encountered during full-scale cover construction, e.g., allow engineers to evaluate, plan for, and/or mitigate factors such as vegetation establishment (in)effectiveness and address issues such as loss of one or more planted species following seeding/vegetation placement, desiccation cracking during or following cover layer placement and compaction; etc..., and

- Provides monitoring data (e.g., from field-scale pan lysimeters) to help evaluate the future infiltration performance of a full-scale cover constructed to a similar set of standards and using the same construction equipment and construction methods, as well as reduces risks associated with potential failure of, or disruption of in-situ cover conditions resulting from emplacement of, one or more monitoring devices installed within the full-scale cover system.

Advance construction and testing of such a Test Pad or Cover Test Section would allow engineers to obtain data on key characteristics of the constructed cover soils that are important for vegetation establishment such as soil nutrients, propagules, and microorganisms (e.g., mycorrhizae) needed to establish a sustainable plant community. Data collected on concentrations of soil macronutrients (e.g., nitrogen, phosphorus, and potassium) and micronutrients (e.g., sulfate, zinc, iron, manganese, copper, calcium, magnesium, sodium, and boron) in the constructed test cover could be used to assess whether they are similar to and within typical ranges for soils around the site which have been selected for use as a natural analog or analogs for predicting the final cover vegetation characteristics and performance.

The sustainability of the ET cover may rely, in part, on the establishment and resilience of a diverse plant community; however, the dynamics of such a plant community are complicated and effects are difficult to predict (e.g., Waugh et al. 2008). Link et al. 1994 indicate that, even in the absence of large-scale disturbances, seasonal and yearly variability in precipitation and temperature will cause changes in species abundance, diversity, biomass production, and soil water extraction rates on covers. Poor shrub establishment, for example, could result in poor water extraction, causing water accumulation in the lower portions of the cover profile during exceptionally wet precipitation periods (percolation exceeding the total storage capacity or drained upper limit of the soils). Data on soil structure development observed to occur over time within a constructed test cover profile following its construction could also be acquired and compared to that observed in natural soils at the selected analog site(s) to assess conditions that could be expected to develop in the future full-scale cover with respect to whether they may be suitable for promoting future development and sustainability of such shrubs, if desired based on the cover infiltration modeling results.

On the basis of the considerations discussed above, the Division requests the following:

- *EFR will need to provide a detailed Technical Work Plan for Division review and approval, no later than 90 days after approval of the revised Infiltration and Contaminant Transport Modeling (ICTM) Report by the Division, for constructing, monitoring and testing a Cover Test Pad/Test Section representative of the intended full-scale cover system. The Work Plan shall: (1) provide a construction schedule; (2) provide details of the proposed Test Pad/Section's design and construction; (3) describe the proposed monitoring/testing program duration; (4) define parameters to be monitored/tested in the Test Pad/Test Section; (5) provide a schedule and details regarding reporting of monitoring and testing results; (6) describe objectives of the Test Pad/Test Section construction, monitoring, and testing program; and (7) propose and justify criteria for demonstrating that those objectives have been achieved.*
- *The Test Pad/Test Section Work Plan will need to address acquisition of data for parameters (e.g., percolation data, weather data, fertilization and nutrient content data and other soil testing, botanical data,...) to validate assumptions and predictions made by EFR with regard to the projected site-specific and cover-specific performance of the full-scale cover, including future emergence rates and characteristics of vegetation on the cover.*
- *The Reclamation Plan should be revised to incorporate the information and requirements described herein with regard to this Test Pad/Test Section.*

EFR's proposal to maintain a rough surface on all but the uppermost lift in the cover is acceptable and EFR should incorporate this commitment into Attachment A of the next revision of the Reclamation Plan.

Response:

The response to the suitability of the White Mesa cover soils relative to vegetative growth and sustainability is addressed in the response to Interrogatory 11/1.

EFRI has added the requirements to maintain a rough surface on all but the uppermost lift of the cover system in the Technical Specifications. The revised Technical Specifications are provided in Attachment C.1.

A workshop was conducted on April 30, 2013 with representatives from the Division, the Division's contractor (URS), EFRI, MWH, and Dr. Craig Benson to discuss Division's February 2013 review comments on the Reclamation Plan, Revision 5.0 (DRC, 2013b) and the revised ICTM Report (DRC, 2013a). During this workshop, Dr. Benson presented a comparison of the White Mesa cover design to the Monticello cover design, as well as information on construction of cover test pads and test monitoring sections. Discussion from this workshop on these topics is summarized in the paragraphs below for this response and was prepared by Dr. Benson. Dr. Benson is the lead author for NUREG/CR-7028 (Benson et al., 2011) and was a lead inspector for the US EPA's Alternative Cover Assessment Program (ACAP), as described in Benson et al. (1999, 2001) and Malusis and Benson (2006). EFRI has engaged Dr. Benson in the cover design for the White Mesa tailings cells with regards to selection of and evaluation of laboratory testing of the cover materials, comparison of the EFRI cover design with the Monticello cover system, development of a plan for the cover test section, and with evaluation of the long-term properties for the cover soils.

EFRI acknowledges that soil layering in the cover profile at the Monticello Uranium Mill Tailings Disposal Facility differs from layering in the monolithic cover proposed for the White Mesa facility. The Monticello cover includes an animal intrusion layer as well as a sand layer at the base, the latter intended to create a capillary break (Figure 1). The cover at Monticello also includes a geomembrane overlying a clay radon barrier at the base. However, the hydrological monitoring conducted at Monticello pertains only to that portion of the cover above the geomembrane, i.e., that portion of the cover functioning as a water balance cover (aka an evapotranspirative cover).

Although the Monticello cover has different elements than the monolithic cover proposed for White Mesa, the cover at Monticello functions as a monolithic cover, as illustrated by the water content record shown in Figure 2.

In all but the wettest years, nearly all of the infiltrating water is managed in the upper 900-mm-thick storage layer, making the impact of the underlying layers unimportant. During those years the cover functions like at 1100-mm thick monolithic cover (surface layer + upper storage layer) (Figure 2). In very wet years, variations in water content occur more deeply, including in the intrusion layer, the underlying 300-mm-thick storage layer, and the sand layer at the base. The variations in water content follow the same pattern as water contents in the upper storage layer, exhibiting the continuity and smooth variation in water content with time and depth that occurs in a monolithic cover.

For example, water contents in each layer are shown in Figure 3 for winter 2004 - 2005, the wettest and snowiest on record. The water content in each layer varies steadily and continuously over months rather than exhibiting an abrupt and sudden change that

would occur if a capillary break existed at the intrusion layer or at the sand layer. In fact, the water content of the sand layer increases appreciably before the overlying lower storage layer approaches saturation, indicating that a capillary break effect is not occurring at the interface between the lower storage layer and the sand layer.

Another example is shown in Figure 4, which depicts the water content in each layer from mid-winter to late summer 2010, which included an exceptionally wet spring during which water penetrated the entire cover profile (Figure 2). The water content records in Figure 4 show a steady downward movement of the wetting front in the profile. There is no “hold up” of the wetting front at the intrusion layer or the sand layer. Moreover, water migrates into the animal intrusion layer and the sand layer without the overlying layers (upper storage layer and lower storage layer, respectively) approaching saturation, indicating that a capillary break was not forming at either interface.

There are reasons why the Monticello cover functions like a monolithic cover, even though the layering may suggest that different behavior should occur in response to contrasts in soil texture. First, the intrusion layer consists of cobble particles embedded in a fine-textured soil matrix. This matrix is comprised of the same fine-textured soil used for the upper and lower storage layers, and provides capillary connectivity between the upper and lower storage layers. Cobble in the intrusion layer does reduce the pore space available for soil water storage, but does not alter the hydrologic dynamics or inhibit the flow of water up or down in the profile. The reason for the absence of a capillary break at the interface between the lower storage layer and the sand is not clear, but the deep location of this interface is a likely cause. The interface may also have been invaded by fines from the overlying lower storage layer during construction, which would provide a capillary conduit between the lower storage layer and the sand layer. Regardless of the mechanism, however, the water content data do indicate that the interface between the lower storage layer and the sand does not create a capillary break.

Thus, while the layering in the cover at Monticello may differ from that at White Mesa, both covers function as monolithic covers, and both are in similar climates (Monticello being slightly wetter and snowier than White Mesa) and are comprised of similar materials. For these reasons, Monticello is an appropriate analog for White Mesa, and probably is the most suitable analog available. Over the past 15 years (2000-2015), the annual percolation rate for Monticello has ranged from 0.0 to 3.8 mm/yr, and has averaged 0.5 mm/yr. During this period, annual precipitation has ranged from 232 to 535 mm and averaged 351 mm, including the wettest and snowiest winter on record (2004-2005). Given these similarities, the cover proposed for White Mesa should provide similar or better hydrologic isolation.

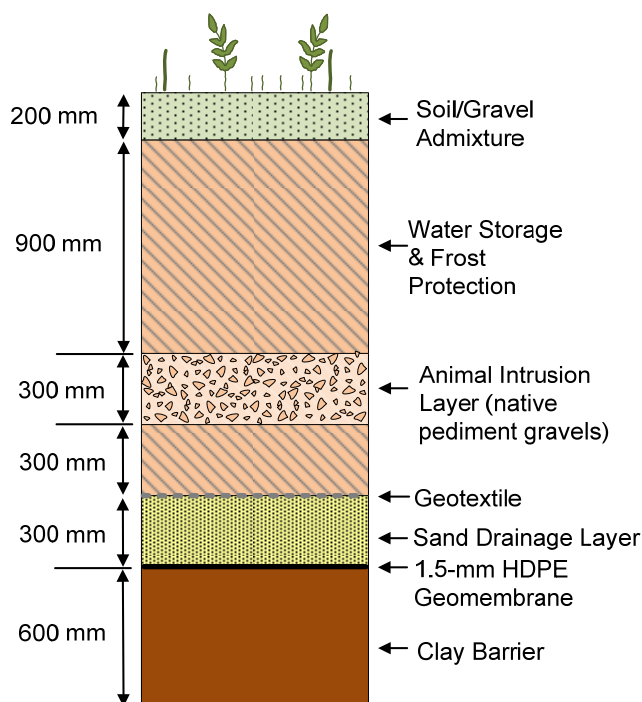


Figure 1. Profile of final cover used for the Monticello disposal facility. Only that portion of the cover above the geomembrane is instrumented for hydrological monitoring.

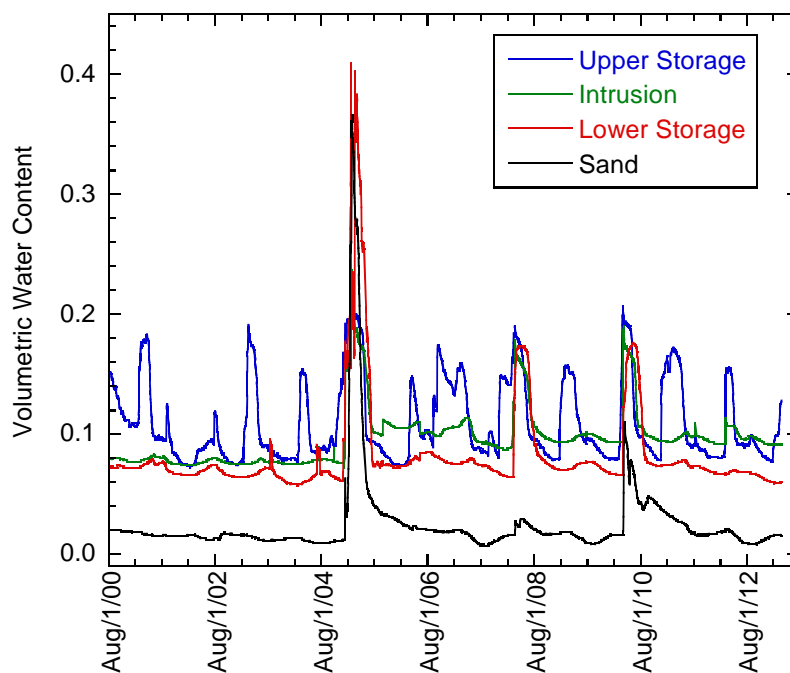


Figure 2. Water content record in Monticello cover in the upper storage layer, animal intrusion layer, lower storage layer, and underlying sand layer.

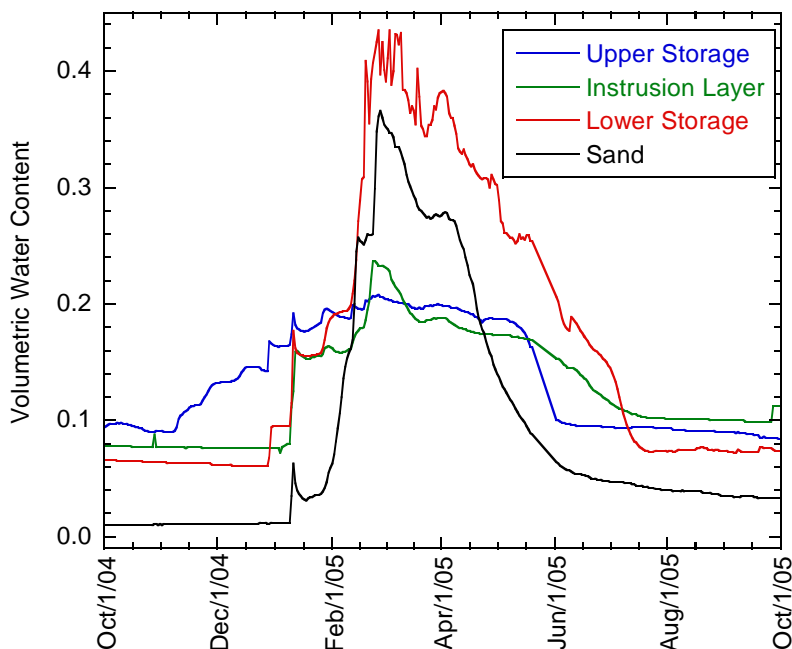


Figure 3. Water content record in Monticello cover in the upper storage layer, intrusion layer, lower storage layer, and underlying sand layer during Winter 04-05, the wettest and snowiest on record.

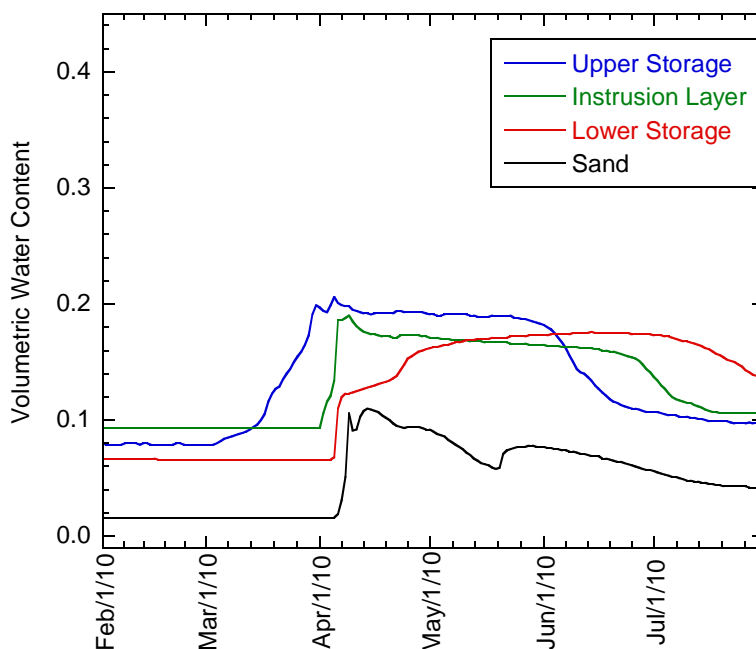


Figure 4. Water content record in Monticello cover in the upper storage layer, animal intrusion layer, lower storage layer, and underlying sand layer during 2010, a very wet spring with moisture penetrating the entire cover.

EFRI understands the Division's position regarding construction of a test section adjacent to the disposal facility that might lead to lessons learned that could be used to improve on, or optimize the cover design. EFRI will be placing the majority of the final cover on Cell 2 after approval of the Reclamation Plan and License Renewal, and will construct a test section within the actual cover (for the full cover profile). This test section, which will be constructed over actual tailings using the same full-scale methods employed for the actual cover, will provide a more realistic representation of cover performance than a test section adjacent to the facility. Moreover, because only a portion of the cover will have been constructed at this point, less learned from the test section can be applied to other areas of the facility as additional final cover is constructed.

EFRI is proposing that the test section be designed, constructed, and monitored using principles developed during US EPA's Alternative Cover Assessment Program (ACAP), as described in Benson et al. (1999, 2001) and Malusis and Benson (2006). The ACAP methodology has been employed to evaluate nearly 50 final cover designs, and has been adopted as the de facto standard for final cover monitoring in the US and abroad. The ACAP methodology is currently being used to monitor the final cover at DOE's Monticello Uranium Mill Tailings Disposal Facility and to evaluate the performance of the cover design employed at DOE's Grand Junction Disposal Facility near Cheney, Colorado. The US Nuclear Regulatory Commission also recommends the ACAP methodology for monitoring the performance of final covers in NUREG/CR-7028 (Benson et al. 2011).

EFRI will engage ACAP investigators (i.e. Dr. Craig Benson) when developing, constructing, and monitoring the test section, and defining the program details mentioned in the interrogatory. The monitoring system will include instruments to measure all components of the water balance, including percolation from the base of the cover, and on-site meteorological conditions. A complementary surveillance program will also be developed to monitor the vegetative community, edaphic properties of the cover soils, and pedogenic evolution of the cover profile, as suggested in NUREG/CR-7028. Comparisons will be made between the monitoring data and predictions and assumptions made when developing the proposed cover design.

References

- Benson, C., T. Abichou, W. Albright, C. Gee, and A. Roesler, 2001. Field Evaluation of Alternative Earthen Final Covers, *International J. Phytoremediation*, 3(1), 1-21.
- Benson, C., T. Abichou, X. Wang, G. Gee, and W. Albright, 1999. Test Section Installation Instructions – Alternative Cover Assessment Program, Environmental Geotechnics Report 99-3, Dept. of Civil & Environmental Engineering, University of Wisconsin-Madison.
- Benson, C., W. Albright, D. Fratta, J. Tinjum, E. Kucukkirca, S. Lee, J. Scalia, P. Schlicht, and X. Wang, 2011. Engineered Covers for Waste Containment: Changes in Engineering Properties & Implications for Long-Term Performance Assessment, NUREG/CR-7028, Office of Research, U.S. Nuclear Regulatory Commission, Washington.

- Malusis, M. and C. Benson, 2006. Lysimeters versus Water-Content Sensors for Performance Monitoring of Alternative Earthen Final Covers, Unsaturated Soils 2006, ASCE Geotechnical Special Publication No. 147, 1, 741-752.
- Utah Department of Environmental Quality, Division of Radiation Control (DRC), 2013a. Radioactive Material License (RML) Number UT 1900479: Review of September 10, 2012 Energy Fuels Resources (USA), Inc. Responses to Round 1 Interrogatories on Revised Infiltration and Contaminant Transport Modeling (ICTM) Report, White Mesa Mill Site, Blanding, Utah, report dated March 2010. February 7.
- Utah Department of Environmental Quality, Division of Radiation Control (DRC), 2013b. Review of August 15, 2012 (and May 31, 2012) Energy Fuels Resources (USA), Inc. Responses to Round 1 Interrogatories on Revision 5 Reclamation Plan Review, White Mesa Mill, Blanding, Utah, report dated September 2011. February 13.

DIVISION'S ASSESSMENT OF EFR RESPONSES TO RD 1 INTERROGATORY WHITE MESA RECPLAN REV. 5.0; R313-24-4; 10CFR40, APPENDIX A, CRITERION 9; INT 15/1; FINANCIAL SURETY ARRANGEMENTS

EFR must submit and receive approval of its revised cost estimates before the Division will approve EFR's proposed and revised cover system design.

EFR has inadequately addressed the time required to dewater Cell 2 and Cell 3 prior to final cover construction, EFR should submit technically supported quantitative projections of the times required to achieve moisture contents for these cells upon which the final covers can be constructed with expectation that the dewatered tailings will not likely contribute to instabilities in the covers. These quantitative analyses should consider all mechanisms that affect water content of the tailings, including (but not limited to) precipitation, runoff, infiltration, lateral drainage, transpiration, evaporation, percolation, groundwater migration, and active removal. Quantitative analyses should also include uncertainty and sensitivity analyses to account for known and likely uncertainties in input parameter values and their effects on dewatering. The Reclamation Plan must include a detailed description of dewatering measures that EFR will use to accomplish dewatering of Cells 2 and 3 within the 7 year-time period specified in the latest Financial Surety submitted to the Division by EFR (See also Section 7.3 above). The current Surety submittal of March 14, 2012 (including the revised submittal dated September 14, 2012) does not list the time to dewater Cell 2. However, all other cells show a 62,400 hour dewatering time). Costs of the specific dewatering measures need to be included in the Financial Surety. Because this revised evaluation and the revised reclamation cost estimates described above were not submitted with EFR's response to the Rd 1 interrogatories, this issue will remain open.

Response:

EFRI conducted a tailings investigation of Cells 2 and 3 in October 2013 at the White Mesa Mill site to address the Division's comment for Interrogatories 07/1 and 09/1 requesting collection of site-specific tailings data to supplement existing tailings data used for settlement analyses. The results are presented in MWH (2015). Results of the investigation indicated migration of water towards the sump in Cell 2. This is expected since water has been pumped from the Cell 2 sump since 2008. Quantitative projections of time to achieve acceptable tailings moisture contents for cover placement cannot be made without additional information on the rate of drainage from the tailings due to Cell 2 dewatering. To further evaluate the change in water levels due to dewatering in Cell 2 prior to and after final cover placement, EFRI plans to install mini-piezometers across the cells prior to the first phase of cover placement. This data will provide information on the rate and extent of dewatering of the cells to confirm when the final phase of cover can be placed and when active maintenance is no longer required.

Costs associated with dewatering were provided in the most recent surety submitted to the Division in 2014. These costs will also be included in the surety to be provided in the next version of the Reclamation Plan.

Reference for Response:

MWH Americas, Inc. (MWH), 2015. White Mesa Mill Tailings Data Analysis Report. Prepared for Energy Fuels Resources (USA) Inc. April.

DIVISION'S ASSESSMENT OF EFR RESPONSES TO RD 1 INTERROGATORY WHITE MESA RECPLAN REV. 5.0; R313-15-501; INT 16/1; RADIATION PROTECTION MANUAL

The Division requests that EFR revise the RPM to specify how the program will be modified to address the unique decommissioning requirements, or the process through which the manual and program will be revised in the future. EFR should also include procedures for gamma radiation surveys in the revised RPM that are discussed in the response document. Because this revised information was not submitted with the response, this interrogatory will remain open.

Response:

The Radiation Protection Manual (RPM) will be modified during the decommissioning process as needed. During the decommissioning process if it is determined that the current RPM does not take into account specific items, then the SERP process will be utilized to amend the RPM in order to address those situations. The SERP summary report will continue to be submitted to the State of Utah, Division of Waste Management and Radiation Control (DWMRC) on an annual basis and will be available upon request at the White Mesa Mill.

Section 2.7 of the RPM now states that the gamma survey for the decommissioning of the site will be conducted in accordance with the most current approved Reclamation Plan, Section 6 of the Technical Specifications. The updated RPM is provided as Attachment I.

**DIVISION'S ASSESSMENT OF EFR RESPONSES TO RD 1 INTERROGATORY WHITE
MESA RECPLAN REV. 5.0 R313-15-1002; INT 17/1; RELEASE SURVEYS**

EFR should yet either (1) cite previously submitted documents where these topics were addressed or (2) develop and submit for the Division's review and approval the following:

- *Decontamination procedures for buildings and equipment.*
- *Disposal of building components and equipment either on-site or off-site, depending on results of release surveys.*

Response:

The Reclamation Plan states that buildings and equipment will be disposed of on-site. If it is determined that some materials are not contaminated and may be free released from the site, then the existing procedure and free release criteria will be used as stated in the RPM Section 2.6 and in accordance with the NRC guidance for "Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use" (dated April 1993). Additional guidance documents referenced in the Technical Specifications, Section 6, will be used as appropriate and applicable to the items being released for unrestricted use.

Decontamination procedures for items to be released for unrestricted use will be developed during reclamation and will be based on the type of equipment and the construction of the equipment (i.e. what the item is constructed of such as metal, glass, plastic etc.). Current Mill procedures will be the basis for the decontamination procedures used at the time of reclamation. If decontamination to the unrestricted release criteria specified in the RPM Section 2.6 is not attainable, the item will be disposed of on site.

**DIVISION'S ASSESSMENT OF EFR RESPONSES TO RD 1 INTERROGATORY WHITE
MESA RECPLAN REV. 5.0 5.0 R313-12; INT 18/1; INSPECTION AND QUALITY ASSURANCE**

EFR has inadequately defined the responsibilities and duties of the Radiation Safety Officer in its revision of the Radiation Protection Manual for Reclamation.

EFR has committed to, but must yet revise Section 1.8b of the Technical Specifications to indicate that the Division must review and approve all reclamation plan design modifications.

Response:

Section 1 of the RPM, which delineates the RSO responsibilities and duties, has been modified to include the following "The RSO will have the responsibility of overseeing all aspects of this procedure and all total releases of any materials from the facility." The updated RPM is provided as Attachment I.

Section 1.8b of the Technical Specifications has been revised to indicate that the Division must review and approve all design modifications to the Reclamation Plan. The revised Technical Specifications are provided in Attachment C.

**DIVISION'S ASSESSMENT OF EFR RESPONSES TO RD 1 INTERROGATORY WHITE
MESA RECPLAN REV. 5.0 R313-24; 10CFR 40.42(J); INT 19/1; REGULATORY GUIDANCE**

Beyond EFR's commitment to revise the Reclamation Plan to reference and incorporate guidance, EFR must yet actually revise the document and submit it for the Division's review and approval.

Response:

The Technical Specifications in Attachment A of the Reclamation Plan have been revised to incorporate and reference NUREG-1575 (NRC, 2000), NUREG-1575 Supplement 1 (NRC, 2009) and NUREG-1757 (NRC, 2006) guidance. The revised Technical Specifications are provided as Attachment C.1.

Reference for Response

United States Nuclear Regulatory Commission (NRC), 2000. Multi-Agency Radiation Survey and Site Investigation Manual. NUREG-1575. August.

United States Nuclear Regulatory Commission (NRC), 2006 NUREG 1757 Volume 2, Consolidated Decommissioning Guidance, Characterization, Survey, and Determination of Radiological Criteria. Revision 1.

United States Nuclear Regulatory Commission (NRC), 2009 NUREG 1575 Supplement 1, Multi-Agency Radiation Survey and Assessment of Materials and Equipment Manual.

DIVISION'S ASSESSMENT OF EFR RESPONSES TO RD 1 INTERROGATORY WHITE MESA RECPLAN REV. 5.0 R313-24; 10CFR40 APPENDIX A CRITERION 6(6); INT 20/1; SCOPING, CHARACTERIZATION, AND FINAL SURVEYS

EFR reasonably addresses the nine topics contained in Items 1 through 9 of the interrogatory. The response provides procedures for how gamma surveys may be conducted and indicate instruments that may be used. These procedures and instruments are not included in the RPM. Additionally, a discrepancy exists between the RPM and the response document regarding the frequency of instrument calibrations. Section 3.1.4.2 of the RPM state "All beta-gamma survey instruments are sent out annually for calibration" whereas the response states "As indicated in the Mill's Radiation Protection Reclamation Manual each existing instrument (Ludlum 19) used will be calibrated by an offsite –third party every 6 months.

The Division requests that EFR incorporate the substance of these responses into the further revised Technical Specifications or other documentation pertinent to the Reclamation Plan. EFR must also resolve the discrepancy stated above. Because this revised information was not submitted with the response, this interrogatory will remain open.

Response:

Section 2.7 of the RPM now states that the gamma survey for the decommissioning of the site will be conducted in accordance with the most current approved Reclamation Plan, Section 6 of the Technical Specifications.

The calibration frequency for beta-gamma survey instruments is every 6 months. The RPM has been corrected. The updated RPM is provided as Attachment I.

ATTACHMENT A

**SUPPORTING DOCUMENTATION FOR INTERROGATORY 01/1:
MILL BUILDING, BOILER PLANT, SCALE HOUSE, AND THE SAMPLE PLANT
ASBESTOS INSPECTION REPORT**



ASBESTOS INSPECTION REPORT


**Mill-Boiler Plant-Scale House-Sample Plant
White Mesa Mill-Denison Mines Corp
6425 S. Highway 191
Blanding, Utah 84511**

August 1, 2012

Prepared for:

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Reviewed by:


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Asbestos Program Manager

IHI Project 12U-A1081

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APPENDICES

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EXECUTIVE SUMMARY

On May 31, 2012, IHI Environmental conducted an asbestos inspection of the Mill Building, Boiler Plant, Scale House and the Sample Plant at the Denison Mines White Mesa Mill in Blanding, Utah. Ms. Jo Ann Tischler, Corporate Director of Compliance and Permitting, requested this inspection to identify asbestos-containing materials (ACM) that exist in the building.

- **No asbestos-containing material was identified in these buildings.**

The suspect asbestos materials identified in these buildings included wall systems on the second level of the Mill Building, floor tiles on the second floor of the Mill Building and the Scale House, and gasketing on the boiler in the Boiler Plant. No suspect asbestos material was identified in the Sample Plant.

The report that follows this Executive Summary should be read in its entirety because it includes important information, such as material descriptions and locations, regulatory requirements, and building-specific recommended response actions.

ASBESTOS INSPECTION

**Mill-Boiler Plant-Scale House
White Mesa Mill-Denison Mines Corp
6425 S. Highway 191
Blanding, Utah**

1.0 INTRODUCTION

On May 30, 2012, IHI Environmental conducted an asbestos inspection of the Mill Building, Boiler Plant, Scale House and the Sample Plant of the White Mesa Mill in Blanding, Utah. Ms. Jo Ann Tischler, of Denison Mines, requested this inspection to identify asbestos-containing materials (ACM) that exist in the facility.

2.0 BUILDINGS DESCRIPTION

- Buildings Identification
 - Buildings NameMill Building, Boiler Plant, Scale House, and Sample Plant
 - Buildings Address6425 South Highway 191, Blanding, Utah 84511
- Building Construction
 - Buildings Construction Date.....circa 1978
 - Renovations.....Not known
 - Building TypePlant, offices, boiler
 - Buildings Total Sq. Ft.33,330 square feet (Mill Building),
2,500 square feet (Boiler Plant),
400 square feet (Scale House),
1,250 square feet (Sample Plant)
 - Structural SystemConcrete foundation with steel (Mill Building and Boiler Plant), wood (Scale House), and concrete with brick (Sample Plant)
 - Exterior Wall ConstructionMetal (Mill Building and Boiler Plant), wood (Scale House), and brick (Sample Plant)
 - Floor Deck ConstructionConcrete (Mill Building, Boiler and Sample Plants), wood (Scale House)
 - Roof Deck ConstructionMetal (Mill Building, Boiler Plant, and Sample Plant), wood (Scale House)

- Roof ConstructionMetal (all buildings)
- Floors
 - Floors Above Grade One (except Mill Building-offices on second level)
 - Floors Below Grade None
- Interior Finishes
 - FloorsConcrete (Mill Building, Boiler and Sample Plant), vinyl floor tile (Scale House and Mill Building second level)
 - Walls Metal (Mill Building and Boiler Plant), brick (Sample Plant), wood (Scale House), and wall system (Mill Building second level)
 - Ceilings Metal (Mill Building and Boiler Plant), brick (Sample Plant), wood (Scale House), and wall system (Mill Building second level)
 - Attic None
 - Basement None
- Building Mechanical
 - Heating Plant Not known
 - Cooling Plant Roof units

3.0 INSPECTION PROCEDURES

3.1 Asbestos-Containing Material (ACM)

IHI visually inspected all accessible areas of the building to identify suspect ACM. To assess the condition and determine friability of the suspect materials, IHI visually examined and touched all accessible surfaces, structures, and mechanical systems within the building.

Suspect ACM was identified and assessed by homogeneous areas. A homogeneous area is defined as a single material, uniform in texture and appearance, installed at one time, and unlikely to consist of more than one type, or formulation, of material. In cases where joint compound and/or tape has been applied to wallboard (gypsum board) and cannot be visually distinguished from the wallboard, it is considered an integral part of the wallboard and in effect becomes one material forming a wall or ceiling "system."

Each homogeneous area was given a unique material identification (ID) number. Each ID number begins with a letter: "S" for surfacing materials, "T" for thermal system insulation, or "M" for miscellaneous materials. This letter is followed by a three-digit number, assigned in consecutive order. This number is used to identify that specific homogeneous area throughout the inspection report.

3.2 Bulk Sampling

To determine the asbestos content of materials, IHI collected bulk samples from all accessible homogeneous areas of suspect ACM and submitted the samples to an accredited laboratory for analysis.

The number of samples collected from each homogeneous area generally followed the U. S. Environmental Protection Agency (EPA) Asbestos Hazard Emergency Response Act (AHERA) regulations (40 CFR §763.86). Friable surfacing materials were sampled using the random sampling scheme given in the EPA publication 560/5-85-030a, titled "Asbestos in Buildings: Simplified Sampling Scheme for Friable Surfacing Materials." Bulk sample IDs collected during the inspection were entered on chain-of-custody forms for submittal to the analytical laboratory.

3.3 Bulk Sample Analysis

Bulk samples were analyzed using polarized light microscopy (PLM) and visual estimation according to the EPA Interim Method for the Determination of Asbestos in Bulk Insulation Samples, EPA-600/M4-82-020. Samples were analyzed by Dixon Information Inc. in Salt Lake City, Utah. Dixon Information is accredited under the National Institute of Standards and Technology, National Voluntary Laboratory Accreditation Program (NIST-NVLAP) for bulk asbestos sample analysis, and is also accredited by the American Industrial Hygiene Association (AIHA).

EPA's National Emissions Standards for Hazardous Air Pollutants (NESHAP) and AHERA regulations define ACM as material containing greater than 1% asbestos by weight; materials containing 1% or less asbestos are not considered regulated ACM by the EPA. Further, the NESHAP regulations state that any sample found to contain less than 10% asbestos but greater than "none detected," by the visual estimation method used during PLM analysis,

must be assumed to contain greater than 1% asbestos unless confirmed by NESHAP point counting analysis.¹

Despite EPA (and Utah Division of Air Quality) rules exempting building materials containing 1% or less asbestos from stringent regulation, Occupational Safety and Health Administration (OSHA) regulations outline specific precautionary work practices when employees work with materials containing even trace amounts of asbestos.²

The laboratory reports can be found in Appendix D of this report.

4.0 INSPECTION RESULTS

4.1 Asbestos-Containing Materials

The Executive Summary and Table 1 in Appendix A list all homogeneous areas that contain asbestos. Each material is described by type of material, friability and visual appearance.

Friability is defined in accordance with EPA's NESHAP regulations.

- “Friable ACM” is any material containing more than 1% asbestos (as determined by PLM) that, when dry, may be crumbled, pulverized, or reduced to powder by hand pressure and also includes non-friable ACM that may become friable during building demolition.
- “Non-friable ACM” is any material containing more than 1% asbestos (as determined by PLM) that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.
- “Category I non-friable ACM” are asbestos-containing resilient floor coverings (commonly known as vinyl asbestos tile (VAT)), asphalt roofing products, packings, and gaskets.
- “Category II non-friable ACM” encompasses all other non-friable ACM.

¹ NESHAP point counting includes examining materials under a polarizing microscope using an eyepiece reticule that superimposes a grid of points over the field of view. 400 points are examined.

² OSHA regulations pertaining to asbestos in buildings include 29 CFR 1926.1101 and 29 CFR 1910.1001. OSHA has also issued interpretive letters that provide clarification about how materials containing less than 1% asbestos should be handled. (see www.osha.gov)

- “Non-friable RACM” is used to denote thermal system insulation that is in good condition but would become friable during renovation or demolition and therefore is "regulated asbestos containing material" (RACM).

4.2 Non-Asbestos-Containing Materials

Homogeneous areas of suspect ACM are identified as non-ACM if material contains no detectable asbestos. Table 2, located in Appendix A of this report, lists all homogeneous areas that were found to be non-ACM.

4.3 Bulk Sample Analytical Results

Table 3, located in Appendix A of this report, lists all the bulk samples (chronologically by sample number) collected from homogeneous areas of suspect ACM, and the laboratory analytical results. Each sample was given a unique sample number. There may be more than one sample number for the same homogeneous area of suspect ACM indicating multiple samples were collected from that homogeneous material. The homogeneous areas of suspect ACM are identified on this table by their material identification numbers. The sample location listed on this table provides a brief, but specific, description of the location where the sample was collected. This is different from the homogeneous area location provided on Tables 1 and 2. Table 4 is the same as Table 3, except that the entries have been sorted by homogeneous area number.

4.4 Damage and Hazard Assessment

Each homogeneous area of ACM was assessed for existing damage, accessibility, and potential for future damage, this information is presented in Table 5, located in Appendix A of this report. This table also lists the substrate beneath each homogeneous area of ACM.

Damage and hazard assessment categories are included in the tables in Appendix A.

4.5 Materials Requiring Special Considerations

The inside of the metal boiler and metal boiler flue could not be accessed during the inspection.

4.6 Assumed Asbestos-Containing Materials

None

4.7 Inaccessible Areas

Suspect materials that were hidden or inaccessible may not have been characterized by this inspection. Therefore, any material not identified in this report as having been tested should be treated as suspect ACM until it has been sampled by a Utah-certified inspector and analyzed by an accredited laboratory applying EPA methods.

In addition, some building structures may have been constructed after the application of ACM, and therefore may have obscured these materials from visual examination during this inspection. Typical scenarios include thermal system insulation inside hardened mechanical chases, floor tile and mastic under walls, and sprayed-on texturing and fireproofing behind structural supports or architectural features.

4.8 Materials Assumed >1% Asbestos (no NESHAP point count)

None

5.0 RESPONSE ACTIONS

5.1 Applicable Rules and Regulations

In Utah, EPA asbestos regulations are administered by the Utah Division of Air Quality (DAQ).³ The Utah Occupational Safety and Health Administration (UOSH) has adopted the Federal OSHA regulations.⁴ In addition, the Salt Lake Valley Health Department (SLVHD) regulates demolition activities in Salt Lake County.⁵ The SLVHD regulations for pre-demolition building inspections require an asbestos inspection, but also require building owners to inspect the building for other hazardous materials such as universal wastes, hazardous and toxic wastes, and lead-based paint. Like asbestos, these wastes, if present, must be removed prior to building demolition.

³ R307-801. Asbestos, Utah Division of Air Quality Rules, Implementation of Toxic Substances Control Act Title II, Asbestos Certification, Asbestos Training, notifications and Asbestos Work Practices for Renovations and Demolitions (See www.airquality.utah.gov).

⁴ Asbestos, Tremolite, Anthophyllite, and Actinolite Standards, Chapter D (Construction), Section 58; and Chapter Z (General Industry), Section 1001, Utah Occupational Safety and Health Rules and Regulations (Administered by Utah Occupational Safety and Health Division) (See www.uosh.utah.gov).

⁵ Salt Lake City – County Health Department, Health Regulation #1 Section 12 (See www.slvhealth.org).

Regulatory factors relevant to asbestos abatement decision-making are included in Appendix E.

5.2 Renovation and Demolition (EPA and OSHA)

A listing of ACM found during this inspection is presented in the Executive Summary at the front of this report, and in Appendix A, Table 1.

NESHAP regulations require the removal of friable ACM and non-friable ACM that could become friable during demolition or renovation activities. Therefore, we recommend that all of the ACM in this building be removed and properly disposed of by a licensed asbestos abatement contractor if total demolition of the facility is planned, or those materials that will be impacted by renovation plans be removed prior to the commencement of renovation work. Despite EPA (and Utah Division of Air Quality) rules exempting building materials containing 1% or less asbestos from stringent regulation, Occupational Safety and Health Administration (OSHA) regulations outline specific precautionary work practices when employees work with materials containing even trace amounts of asbestos.⁶ Strict compliance by building owners with the OSHA asbestos regulations may result in response actions not required by the EPA and Utah DAQ for certain unregulated materials.

6.0 COST ESTIMATES

Details of the estimated removal costs by homogeneous area can be found in Table 6, Appendix A, and in the Executive Summary table. These estimates are provided for budgeting and planning only, and do not have a level of accuracy sufficient to be used as a construction design cost estimate. The actual cost of asbestos removal is dependent on factors such as the size of the job, the required time frame for removal, the time of year the job is conducted, and economic factors. These estimates do not include replacement costs, or the cost for asbestos abatement design and management consulting services.

⁶ OSHA regulations pertaining to asbestos in buildings include 29 CFR 1926.1101 and 29 CFR 1910.1001. OSHA has also issued interpretive letters that provide clarification about how materials containing less than 1% asbestos should be handled. (see www.osha.gov)

Appendix A

Data Tables

Table 2
Homogeneous Areas That Do Not Contain Asbestos

Mill Building
White Mesa Mill-Denison Mines Corp

Homogeneous Area Number	Material Description/Location	Amount
M001	Wall System White joint compound paper tape and white gypsum plaster Throughout walls of Lab, Office, Lunch Room and Restrooms on Second Level	3,450 sq. ft.
M002	Floor Tile and Mastic on Cement 12" x 12" Tan vinyl floor tile and black mastic Throughout walls of Lab, Office, Lunch Room and Restrooms on Second Level	920 sq. ft.

Table 3
Bulk Sample Analytical Results by Sample Number
 Mill Building
 White Mesa Mill-Denison Mines Corp

Sample Number	Homogeneous Area Number	Material Sampled	Sample Location	Analytical Results
A1081M-1	M001	Wall System	NE. corner wall of Office, Second Level	ND
A1081M-2	M001	Wall System	Center of wall of Lunch Room, Second Level	ND
A1081M-3	M002	Floor Tile and Mastic on Cement	Lunch Room, Second level	ND: floor tile ND: black mastic
A1081M-4	M002	Floor Tile and Mastic on Cement	Office, Second Level	ND: floor tile ND: black mastic

Note: ND =No Asbestos Detected, NA= Not Analyzed, TR = <1% Asbestos, PC = Point Count

Table 4
Bulk Sample Analytical Results by Homogeneous Area Number
 Mill Building
 White Mesa Mill-Denison Mines Corp

Sample Number	Homogeneous Area Number	Material Sampled	Sample Location	Analytical Results
A1081M-1	M001	Wall System	NE. corner wall of Office, Second Level	ND
A1081M-2	M001	Wall System	Center of wall of Lunch Room, Second Level	ND
A1081M-3	M002	Floor Tile and Mastic on Cement	Lunch Room, Second level	ND: floor tile ND: black mastic
A1081M-4	M002	Floor Tile and Mastic on Cement	Office, Second Level	ND: floor tile ND: black mastic

Note: ND =No Asbestos Detected, NA= Not Analyzed, TR = <1% Asbestos, PC = Point Count

Table 2
Homogeneous Areas That Do Not Contain Asbestos

Boiler Room
White Mesa Mill-Denison Mines Corp

Homogeneous Area Number	Material Description/Location	Amount
M001	Gasket Light tan fiberglass gasket Boiler Building	1 unit

Table 3
Bulk Sample Analytical Results by Sample Number
Boiler Room
White Mesa Mill-Denison Mines Corp

Sample Number	Homogeneous Area Number	Material Sampled	Sample Location	Analytical Results
A1081B-1	M001	Gasket	Boiler Building	ND

Note: ND =No Asbestos Detected, NA= Not Analyzed, TR = <1% Asbestos, PC = Point Count

Table 4
Bulk Sample Analytical Results by Homogeneous Area Number
Boiler Room
White Mesa Mill-Denison Mines Corp

Sample Number	Homogeneous Area Number	Material Sampled	Sample Location	Analytical Results
A1081B-1	M001	Gasket	Boiler Building	ND

Note: ND =No Asbestos Detected, NA= Not Analyzed, TR = <1% Asbestos, PC = Point Count

Table 2
Homogeneous Areas That Do Not Contain Asbestos
Scale House
White Mesa Mill-Denison Mines Corp

Homogeneous Area Number	Material Description/Location	Amount
M001	Floor Tile and Mastic on Wood 12" x 12" Gray vinyl floor tile and yellow adhesive Scale House	390 sq. ft.
M002	Floor Tile and Mastic on Wood 12" x 12" Tan vinyl floor tile and yellow adhesive (patches) Scale House	10 sq. ft.

Table 3
Bulk Sample Analytical Results by Sample Number
Scale House
White Mesa Mill-Denison Mines Corp

Sample Number	Homogeneous Area Number	Material Sampled	Sample Location	Analytical Results
A1081SH-01	M001	Floor Tile and Mastic on Wood	Scale House	ND
A1081SH-02	M002	Floor Tile and Mastic on Wood	Scale House	ND

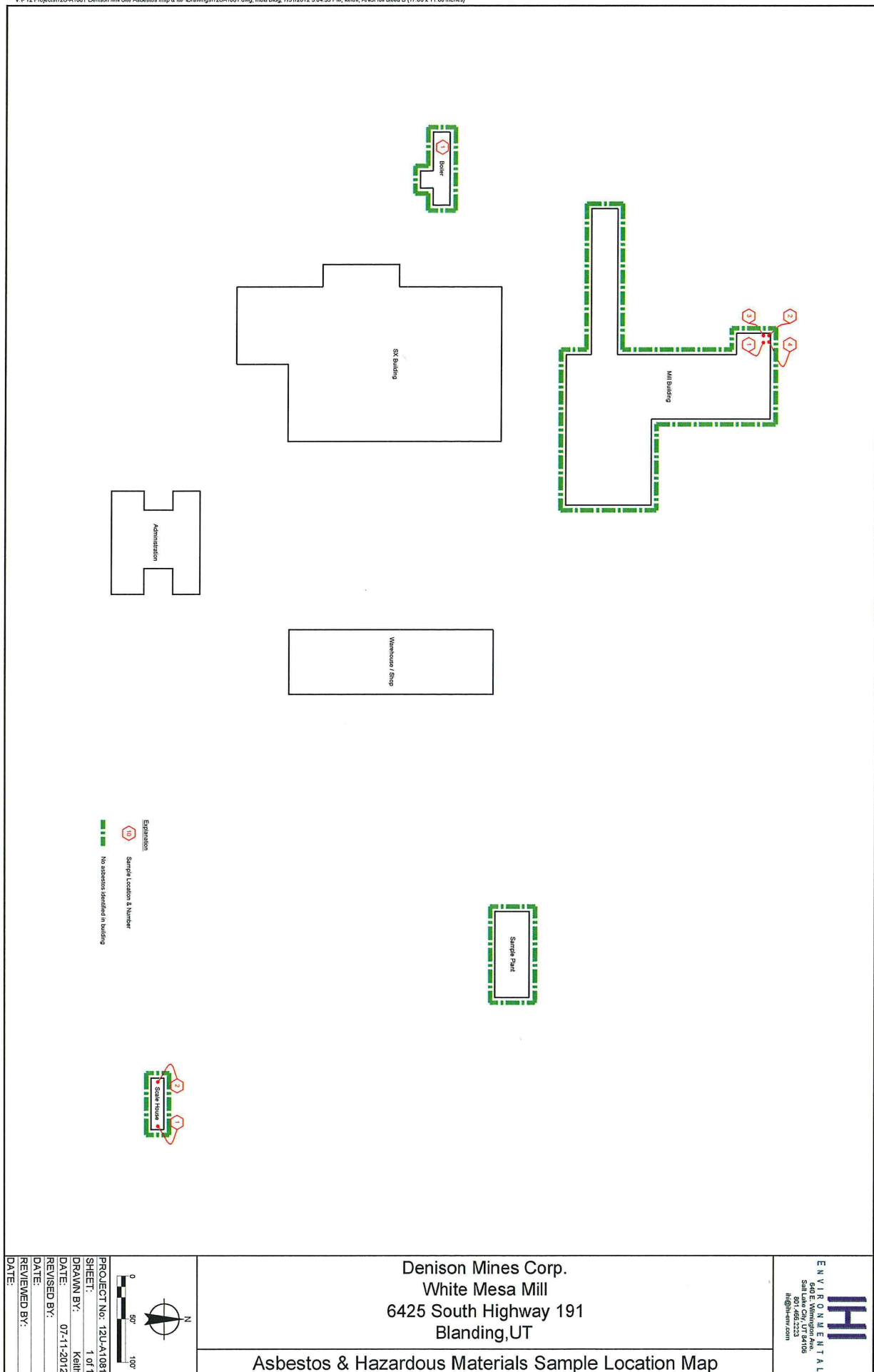
Note: ND =No Asbestos Detected, NA= Not Analyzed, TR = <1% Asbestos, PC = Point Count

Table 4
Bulk Sample Analytical Results by Homogeneous Area Number
Scale House
White Mesa Mill-Denison Mines Corp

Sample Number	Homogeneous Area Number	Material Sampled	Sample Location	Analytical Results
A1081SH-01	M001	Floor Tile and Mastic on Wood	Scale House	ND
A1081SH-02	M002	Floor Tile and Mastic on Wood	Scale House	ND

Note: ND =No Asbestos Detected, NA= Not Analyzed, TR = <1% Asbestos, PC = Point Count

Appendix B
Building Floor Plans



Appendix C

Photographs



Photograph 1

The floor tile and adhesive on the second level of the Mill Building did not contain asbestos.



Photograph 2

The wall system on the second level of the Mill Building was reported as none detected for asbestos.



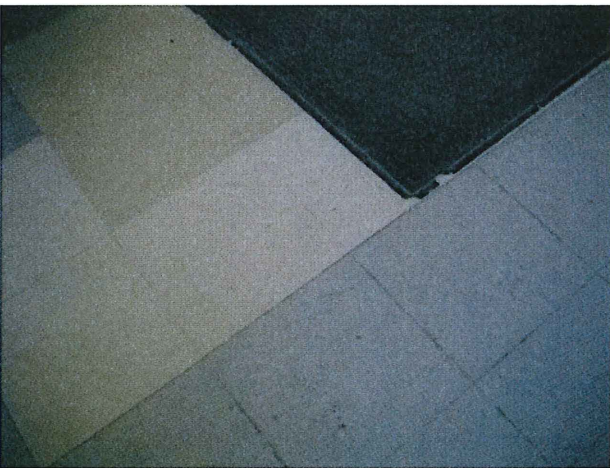
Photograph 3

The gasket on the boiler of the Boiler Plant did not contain asbestos.



Photograph 4

The metal boiler flue could not be accessed to inspect for suspect asbestos materials.



Photograph 5

The floor tiles in the Scale House were reported as none detected for asbestos.



Photograph 6

No suspect asbestos material was identified at the dump yard.

Appendix D
Laboratory Results

DIXON INFORMATION INC.

MICROSCOPY, ASBESTOS ANALYSIS & CONSULTING

A.I.H.A. ACCREDITED LABORATORY # 101579

NVLAP LAB CODE 101012-0

June 13, 2012

Mr. Lono Folau
IHI Environmental
640 East Wilmington Ave
Salt Lake City, UT 84106

Ref: Batch # 104908, Lab # H19744 - H19750
Received June 6, 2012
Test report Page 1 of 3
Denison Mines-White Mesa Mill
Mill Building\Boiler\Scale House
6425 S Highway 191, Blanding UT
Proj# 12U-A1081
Sampled by Lono Folau

Dear Mr. Folau:

Samples H19744 through H19750 have been analyzed by visual estimation based on EPA-600/M4-82-020 December 1982 optical microscopy test method, with guidance from the EPA/600/R-93/116 July 1993 and OSHA ID 191 methods. Appendix "A" contains statements which an accredited laboratory must make to meet the requirements of accrediting agencies. It also contains additional information about the method of analysis. This analysis is accredited by NVLAP. Appendix "A" must be included as an essential part of this test report. The data for this report is accredited by NVLAP for laboratory number 101012-0. It does not contain data or calibrations for tests performed under the AIHA program under lab code 101579.

This report may be reproduced but all reproduction must be in full unless written approval is received from the laboratory for partial reproduction. The results of analysis are as follows:

Lab H19744, Field A1081M-1 Wall system

This sample contains white paint, white gypsum plaster with mica, brown and off-white plant fiber paper, and white gypsum plaster with 1% fiberglass. This sample is non-homogeneous. **Asbestos is none detected.**

The paint is 1% of the sample. The plaster with mica is 4% of the sample. The plant fiber paper is 5% of the sample. The white gypsum plaster is 90% of the sample.

Batch # 104908

Lab # H19744 - H19750

Page 2 of 3

Lab H19745, Field A1081M-2 Wall system

This sample contains white paint, white gypsum plaster with mica, brown plant fiber paper, and white gypsum plaster with 1% fiberglass. This sample is non-homogeneous. **Asbestos is none detected.**

The paint is 1% of the sample. The plaster with mica is 1% of the sample. The plant fiber paper is 5% of the sample. The white gypsum plaster is 93% of the sample.

The analysis sensitivity is limited in the second material type due to the thin layer.

Lab H19746, Field A1081M-3 Floor tile and mastic

This sample contains three types of material: The first type is tan plastic and limestone; the second type is yellow resin mastic; the third type is black tar mastic with 1% organic fiber in debris. This sample is non-homogeneous. **Asbestos is none detected.**

The first type is 97% of the sample. The second type is 1% of the sample. The third type is 2% of the sample.

Lab H19747, Field A1081M-4 Floor tile and mastic

This sample contains two types of material: The first type is off-white plastic and limestone; the second type is black tar mastic with less than 1% organic fiber in debris. This sample is non-homogeneous. **Asbestos is none detected.**

The first type is 99% of the sample. The second type is 1% of the sample.

Lab H19748, Field A1081B-1 Boiler gasket

This is 95% fiberglass in brown binder. **Asbestos is none detected.**

Lab H19749, Field A1081SH-1 Floor tile and mastic

This sample contains two types of material: The first type is gray plastic and limestone; the second type is yellow resin mastic. This sample is non-homogeneous. **Asbestos is none detected.**

The first type is 99% of the sample. The second type is 1% of the sample.

Batch #104908

Lab #H19744-H19750

Page 3 of 3

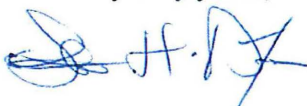
Lab H19750, Field A1081SH-2 Floor tile and mastic

This sample contains three types of material: The first type is tan binder; the second type is tan plastic and limestone; the third type is yellow resin mastic. This sample is non-homogeneous. **Asbestos is none detected.**

The first type is 1% of the sample. The second type is 98% of the sample. The third type is 1% of the sample.

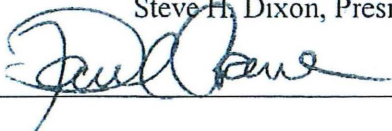
In order to be sure reagents and tools used for analysis are not contaminated with asbestos, blanks are tested. Asbestos was none detected in the blanks tested with this bulk sample set.

Very truly yours,



Steve H. Dixon, President

Analyst: Paul Crane



Date Analyzed: June 13, 2012

Dixon Information Inc.
78 West 2400 South
South Salt Lake, Utah 84115
Phone: 1-801-486-0800 Fax: 1-801-486-0849

BULK ANALYTICAL REQUEST FORM

Turnaround Time - Circle One

Batch Number 104908

Rush (24 hours \$25.00 per sample)

☒ **Non-rush** (5 Working days \$17.00 per sample)

Name of location sample was taken at Denison Mines - White Mesa Mill
Street address sample was taken at Mill Building & Boiler & Scale House
Sampled by: Lono Folau

Report to be sent to: Lono Folau
Company: IHI Environmental
Address: 640 E. Wilmington Ave
City: SLC State: UT
Zip Code: 84106
Telephone #: 801-466-2223
Fax #: 801-466-9616
E-mail: lfolau@ihi-env.com

Billing to be sent to: _____
Company: IHI Environmental
Address: _____
City: _____ State: _____
Zip Code: _____
Telephone #: _____
Fax #: _____
PO #: 12V-A1081

Field #	Description of Sample	Samples Collected		Lab #
		Date	Time	
A1081M				
1	Wall system	5/30/12		19744
2	" "			19745
3	Floor tile and mastic			19746
4	" " " "	5/30/12		19747
A1081B-				
1	Boiler gasket	5/30/12		19748
A1081SH-				
1	Floor tile and mastic	5/30/12		19749
2	" " " "	5/30/12		19750

Chain of Custody

Submission of asbestos samples for analysis and/or signing a chain of custody is the equivalent of submission of a purchase order and constitutes an agreement to pay for services provided at Dixon Information Incorporated standard schedule of fees for services.

Submitted by: [Signature]
Received by Lab: [Signature]
Received by Analyst: [Signature]
Returned by Lab: _____

Date: 6/6/12 Time: _____
Date: 6-6-12 Time: 1320
Date: 6/13/12 Time: 1100
Date: _____ Time: _____

Appendix "A"

"This report relates only to the items tested. This report must not be used to claim product endorsement by NVLAP or AIHA."

NVLAP and AIHA requires laboratories to state the condition of samples received for testing: These samples are in acceptable condition for analysis unless there is a statement in the report of analysis that a test item has some characteristics or condition that precludes analysis or requires a modification of standard analytical methodology. If a test item is not acceptable, the reasons for non-acceptability will be given under the laboratory number for that particular test item. The reported percentages of each material type are based on the sample received by the laboratory and may not be representative of the parent material. Orientation of top and bottom may not be specified due to uncertainty of orientation.

Methods of Analysis and Limit of Detection

In air count analysis, the results may be biased when interferences are noted.

The accuracy of asbestos analysis in bulk samples increases with increasing concentration of asbestos. Pigments, binders, small sample size, and multiple layers may affect the analysis sensitivity.

There are two methods for analysis of asbestos in a bulk test sample. Visual estimation is the most sensitive method. If an analyst makes a patient search, 0.1% or less asbestos can be detected in a bulk sample.

The second method of analysis is a statistical approach called point counting. EPA will not accept visual estimations if a laboratory detects a trace of asbestos in a sample i.e. anything less than 1% asbestos. Government agencies regulate asbestos containing materials (ACM) whenever the ACM is more than 1%. OSHA requirements apply on samples containing any amount of asbestos.

Due to the higher charge for a point count analysis, Dixon Information Inc. does not perform a point count unless authorized to do so by the client. If a sample is point counted, when possible, various chemical and/or physical means may be used to concentrate the asbestos in the sample. This is permitted by the EPA method and it increases the accuracy of the analysis.

Appendix E
Regulatory Factors

Several factors determine how asbestos in a building must be treated if it has the potential of being disturbed during a renovation or demolition. These factors include the following:

Factor	EPA Regulations for Asbestos Removal	OSHA Regulations for Asbestos Removal
Definition of asbestos in a building material	Defines ACM as a material containing 1% or greater asbestos.	Defines an ACM as one containing >1% asbestos.
Regulation of asbestos in building materials	Regulates only ACM. If the asbestos concentration in a material is shown to be “none detected” by initial analysis or 1% or less by point count analysis, EPA/DAQ does not regulate it.	Regulates not only ACM but all materials containing any amount of asbestos. Regulations are not as stringent for materials containing equal-to or less-than 1% asbestos but greater than a “none detected” concentration.
Determination of asbestos concentration in a gypsum board wall system	Allows compositing of all layers (joint compound, joint tape, and gypsum board) into one sample, which decreases the possibility that the sample will be evaluated as an ACM.	Requires that each layer of the wall system be analyzed and reported independently, which increases the possibility of a sample containing ACM or identifiable asbestos.
Defines regulated and non-regulated ACM	Yes – Regulated ACM include friable ACM and resilient flooring, asphalt roofing, gaskets and packing that have become friable and other ACM that have a high probability of becoming friable.	No – Requirements for asbestos work procedures and worker training are less stringent for resilient flooring, asphalt roofing materials, and materials containing greater than “none detected” but not greater than 1% asbestos.
Notification of asbestos abatement or building demolition required	Yes – Utah DAQ must be notified on the appropriate form 10 working-days prior to an asbestos abatement of regulated asbestos material greater than the NESHAP-established notifiable quantity with demolition, or demolition where abatement is not required.	No – Not required.
Provision for allowing ACM to remain in a building during a demolition.	Yes – Allows ACM resilient flooring, asphalt roofing, and certain other non-friable building materials in good condition to remain in a building during demolition as long as the demolition process will not render them friable.	No – If any asbestos is left in a building during a demolition, the demolition workers are expected to meet the same OSHA requirements that an abatement contractor would meet if an abatement contractor was conducting an abatement of those materials.

Appendix F
Project Limitations

PROJECT LIMITATIONS

This Project was performed using, as a minimum, practices consistent with standards acceptable within the industry at this time, and a level of diligence typically exercised by EH&S consultants performing similar services.

The procedures used attempt to establish a balance between the competing goals of limiting investigative and reporting costs and time, and reducing the uncertainty about unknown conditions. Therefore, because the findings of this report were derived from the scope, costs, time and other limitations, the conclusions should not be construed as a guarantee that all universal, toxic and/or hazardous wastes have been identified and fully evaluated.

Furthermore, IHI assumes no responsibility for omissions or errors resulting from inaccurate information, or data, provided by sources outside of IHI or from omissions or errors in public records.

It is emphasized that the final decision on how much risk to accept always remains with the client since IHI is not in a position to fully understand all of the client's needs. Clients with a greater aversion to risk may want to take additional actions while others, with less aversion to risk, may want to take no further action.

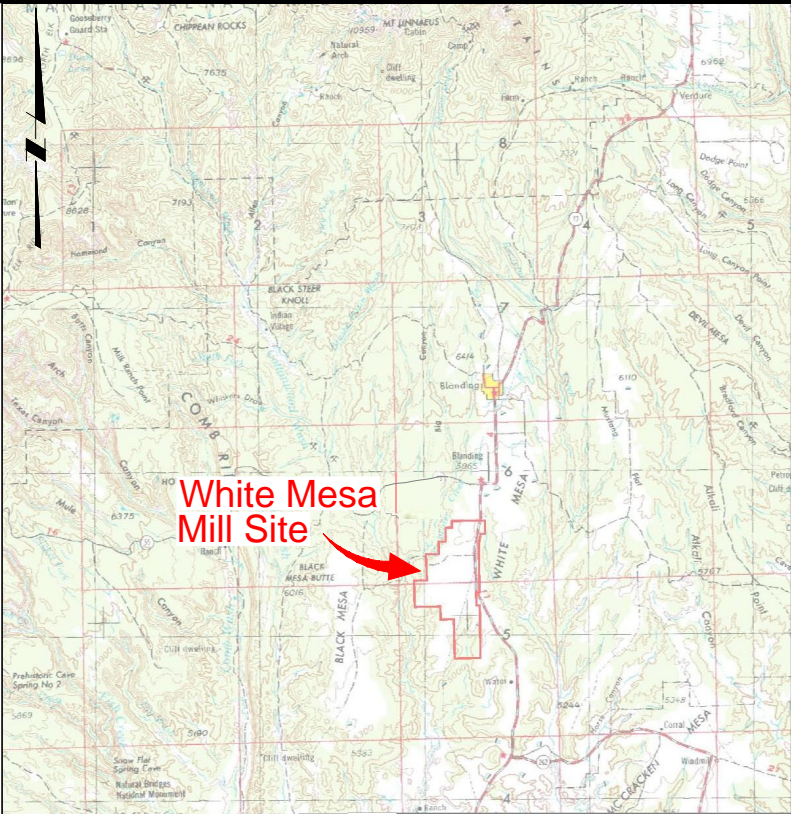
ATTACHMENT B

SUPPORTING DOCUMENTATION FOR INTERROGATORY 02/1:

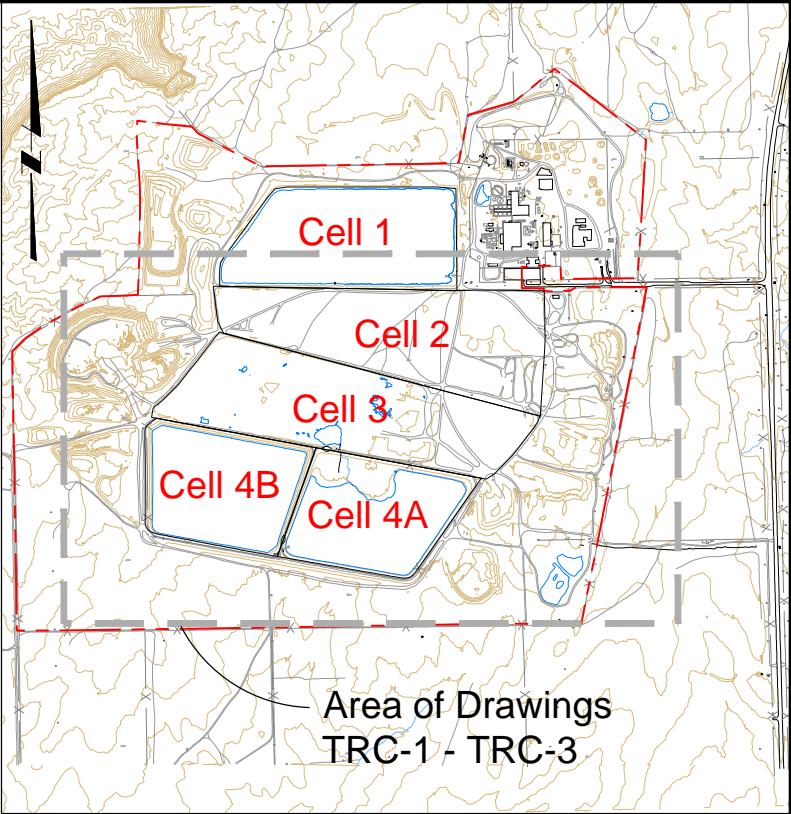
**REVISED RECLAMATION PLAN DRAWINGS TO ATTACHMENT A OF
RECLAMATION PLAN, REVISION 5.0**



LOCATION MAP
NOT TO SCALE



VICINITY MAP
NOT TO SCALE



SITE MAP
NOT TO SCALE



INDEX OF DRAWINGS		
SHEET	TITLE	REV
REC-0	TITLE SHEET AND PROJECT LOCATION MAP	B
REC-1	PLAN VIEW OF RECLAMATION FEATURES	B
REC-2	MILL SITE AND ORE PAD AREA GRADING PLAN	B
REC-3	SEDIMENTATION BASIN DETAIL	B
TRC-1	INTERIM FILL GRADING PLAN	B
TRC-2	COMPACTED COVER GRADING PLAN	B
TRC-3	FINAL COVER SURFACE LAYOUT	B
TRC-4	RECLAMATION COVER EROSION PROTECTION	B
TRC-5	COVER OVER CELL 4A & 4B CROSS SECTIONS	B
TRC-6	COVER OVER CELL 3 CROSS SECTIONS	B
TRC-7	COVER OVER CELL 2 CROSS SECTIONS	B
TRC-8	COVER OVER CELL 2 CROSS SECTION	B
TRC-9	RECLAMATION COVER DETAILS (SHEET 1 OF 2)	B
TRC-10	RECLAMATION COVER DETAILS (SHEET 2 OF 2)	B

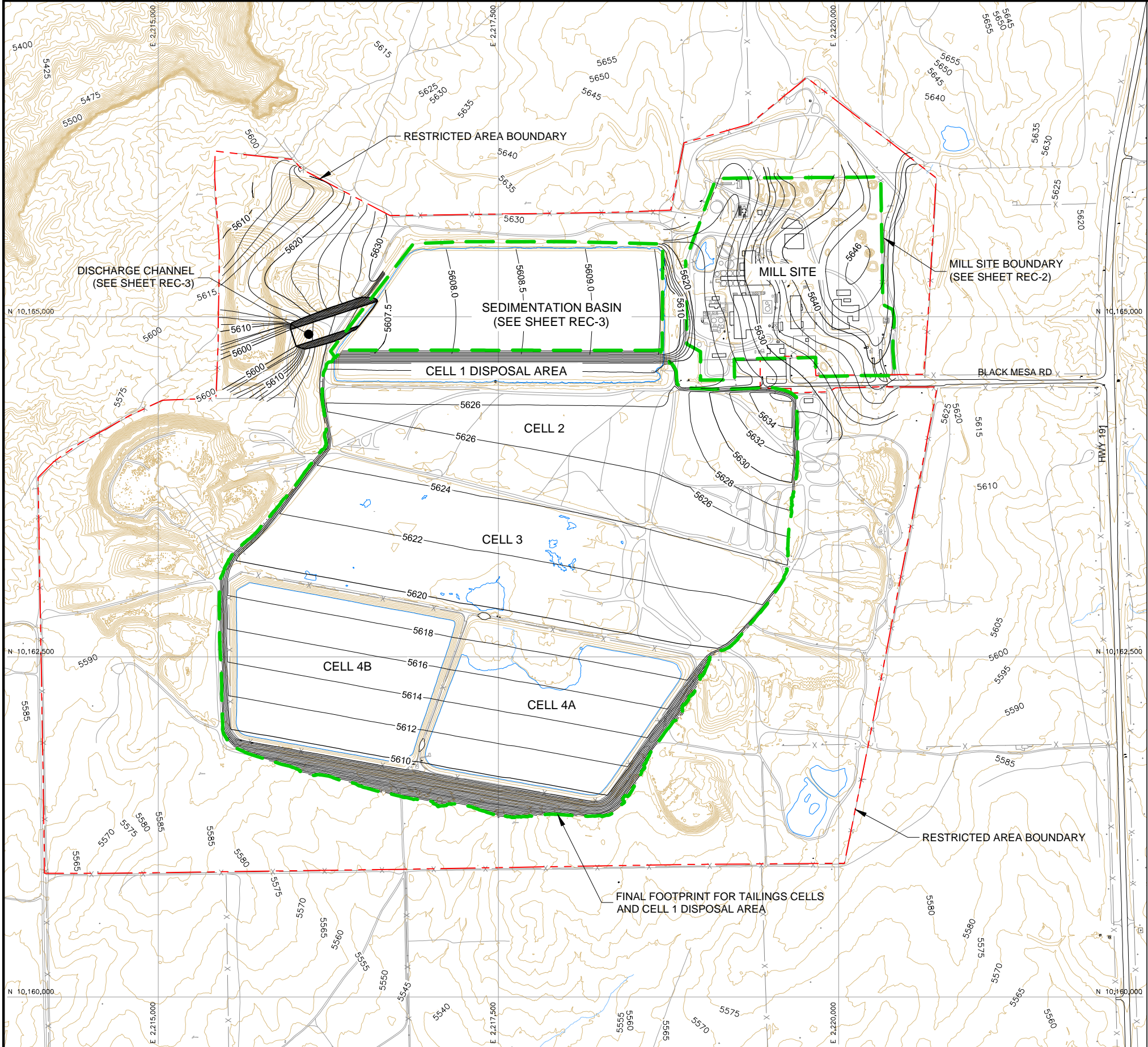
WHITE MESA MILL TAILINGS RECLAMATION

prepared for

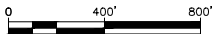
ENERGY FUELS RESOURCES (USA) INC.

SAN JUAN COUNTY, UTAH

				DISCLAIMER: THIS DRAWING WAS DEVELOPED THROUGH THE APPLICATION OF PROFESSIONAL ENGINEERING SKILL AND PROPRIETARY METHODOLOGIES, PROCESSES AND KNOW HOW OF MWH AS AUTHOR ALL PURSUANT TO THE TERMS OF A CONTRACTUAL SCOPE OF WORK GOVERNING ITS PREPARATION. THIS DRAWING MAY NOT BE USED OR MODIFIED OTHER THAN IN STRICT ACCORDANCE WITH THE TERMS OF THE GOVERNING CONTRACT AND SCOPE OF WORK OR OTHERWISE ABSENT THE INVOLVEMENT AND CONSENT OF THE AUTHOR. ANY ALTERATION OR ADAPTATION OF THIS DRAWING SHALL BE CONSISTENT WITH THE AUTHOR'S CONTRACTUAL AND PROPRIETARY RIGHTS AND BE AT USER'S SOLE RISK AND WITHOUT ANY LIABILITY OR LEGAL RESPONSIBILITY OF MWH.						DESIGNED BY M DAVIS 08-15				PROJECT LOCATION BLANDING, UTAH					
							DRAWN BY D MIRANDA 08-15			PROJECT WHITE MESA MILL TAILINGS RECLAMATION									
							CHECKED BY C STRACHAN 08-15			TITLE TITLE SHEET AND PROJECT LOCATION MAP									
B ISSUED WITH EFRI 2015 RESPONSES TO FEB 2013 DRC REVIEW COMMENTS				DM	MD	08-15				APPROVED BY M DAVIS 08-15				SHEET REC-0			REVISION B		
A ISSUED FOR RECLAMATION PLAN REVISION 5.0				DM	RS	08-11				PROJECT MANAGER M DAVIS 08-15				FILE NAME WMM COVER			DATE AUG 2015		
ISSUE REV DESCRIPTION				TECH	ENG	DATE				CLIENT APPROVAL									
										CLIENT REFERENCE NO.									



- LEGEND:**
- 5605 EXISTING GROUND SURFACE ELEVATION, FEET (SEE REFERENCE)
 - 5605 FINAL GRADING SURFACE CONTOUR AND ELEVATION, FEET
 - EXISTING ROAD
 - EXISTING WATER
 - EXISTING TRAIL
 - X EXISTING FENCE
 - EXISTING STRUCTURE



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REV	ISSUE	DESCRIPTION	TECH	ENG	DATE
B	ISSUED WITH EFRI 2015 RESPONSES TO FEB 2013 DRC REVIEW COMMENTS	DM	MD	08-15	
A	ISSUED FOR RECLAMATION PLAN REVISION 5.0	DM	RS	08-11	

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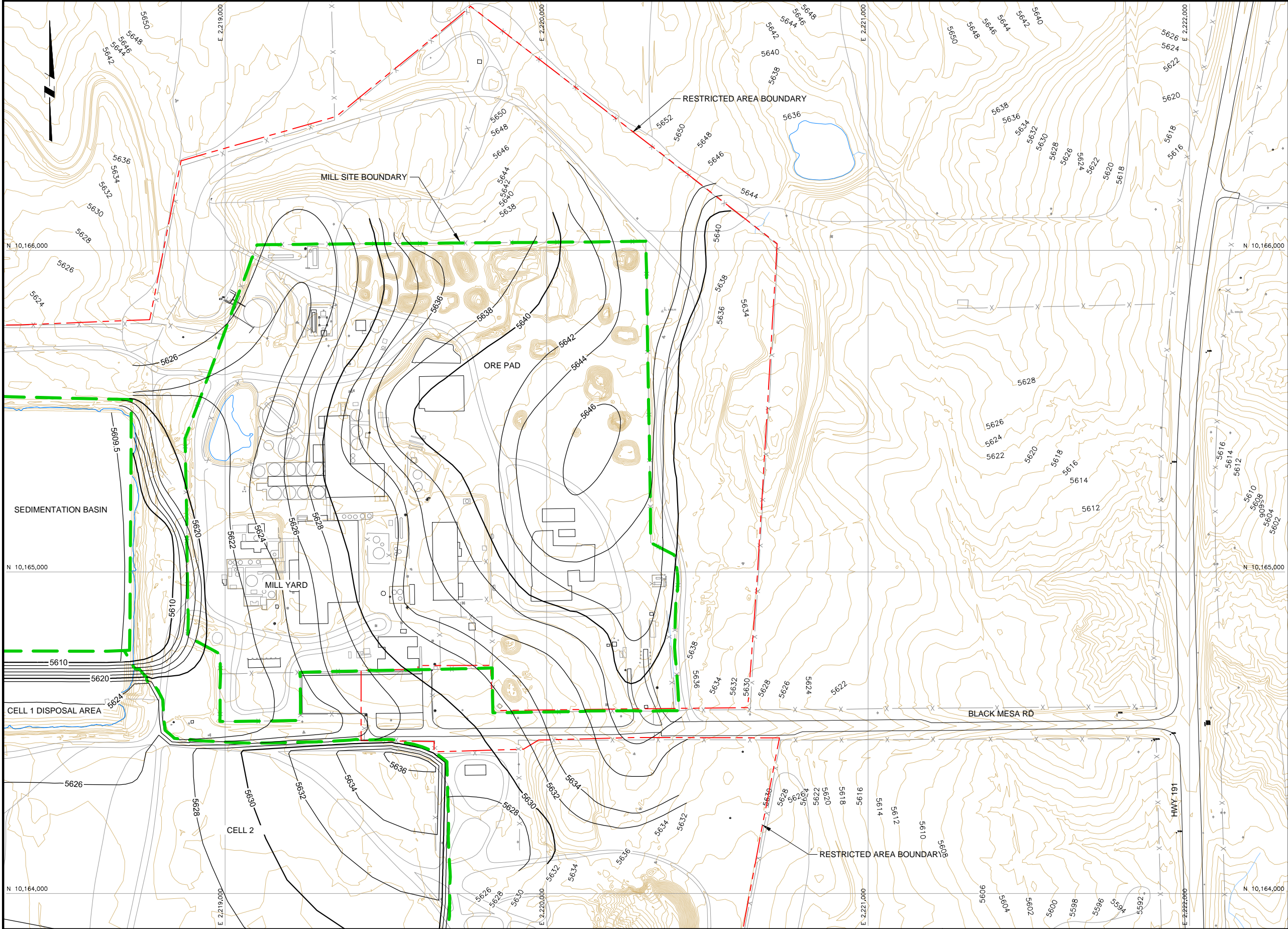
DRAWING REFERENCE(S):
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DESIGNED BY	M DAVIS	08-15
DRAWN BY	D MIRANDA	08-15
CHECKED BY	C STRACHAN	08-15
APPROVED BY	M DAVIS	08-15
PROJECT MANAGER	M DAVIS	08-15
CLIENT APPROVAL		
CLIENT REFERENCE NO.		



PROJECT LOCATION	BLANDING, UTAH
PROJECT	WHITE MESA MILL TAILINGS RECLAMATION
TITLE	PLAN VIEW OF RECLAMATION FEATURES

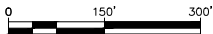
SHEET	REC-1	REVISION	B
FILE NAME	WMM REC-1	DATE	AUG 2015



LEGEND:

- 5605 EXISTING GROUND SURFACE ELEVATION, FEET (SEE REFERENCE)
- 5605 FINAL GRADING SURFACE CONTOUR AND ELEVATION, FEET
- EXISTING ROAD
- EXISTING WATER
- EXISTING TRAIL
- EXISTING FENCE
- EXISTING STRUCTURE

- NOTES:**
- ADAPTED FROM DENISON MINES (USA) CORPORATION FIGURE A-3.2-1. TITLE: MILL SITE AND ORE PAD FINAL GRADING PLAN, DATED FEBRUARY, 1997.
 - ACTUAL FIELD CONDITIONS MAY VARY FROM FEATURES SHOWN.
 - ACTUAL FINAL CONTOURS WILL DEPEND ON EXTENT OF EXCAVATION DICTATED BY RESULTS OF FIELD RADIOMETRIC SURVEYS.



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REV	ISSUE	DESCRIPTION	TECH	ENG	DATE
B	ISSUED WITH EFRI 2015 RESPONSES TO FEB 2013 DRC REVIEW COMMENTS	DM	MD	08-15	
A	ISSUED FOR RECLAMATION PLAN REVISION 5.0	DM	RS	08-11	

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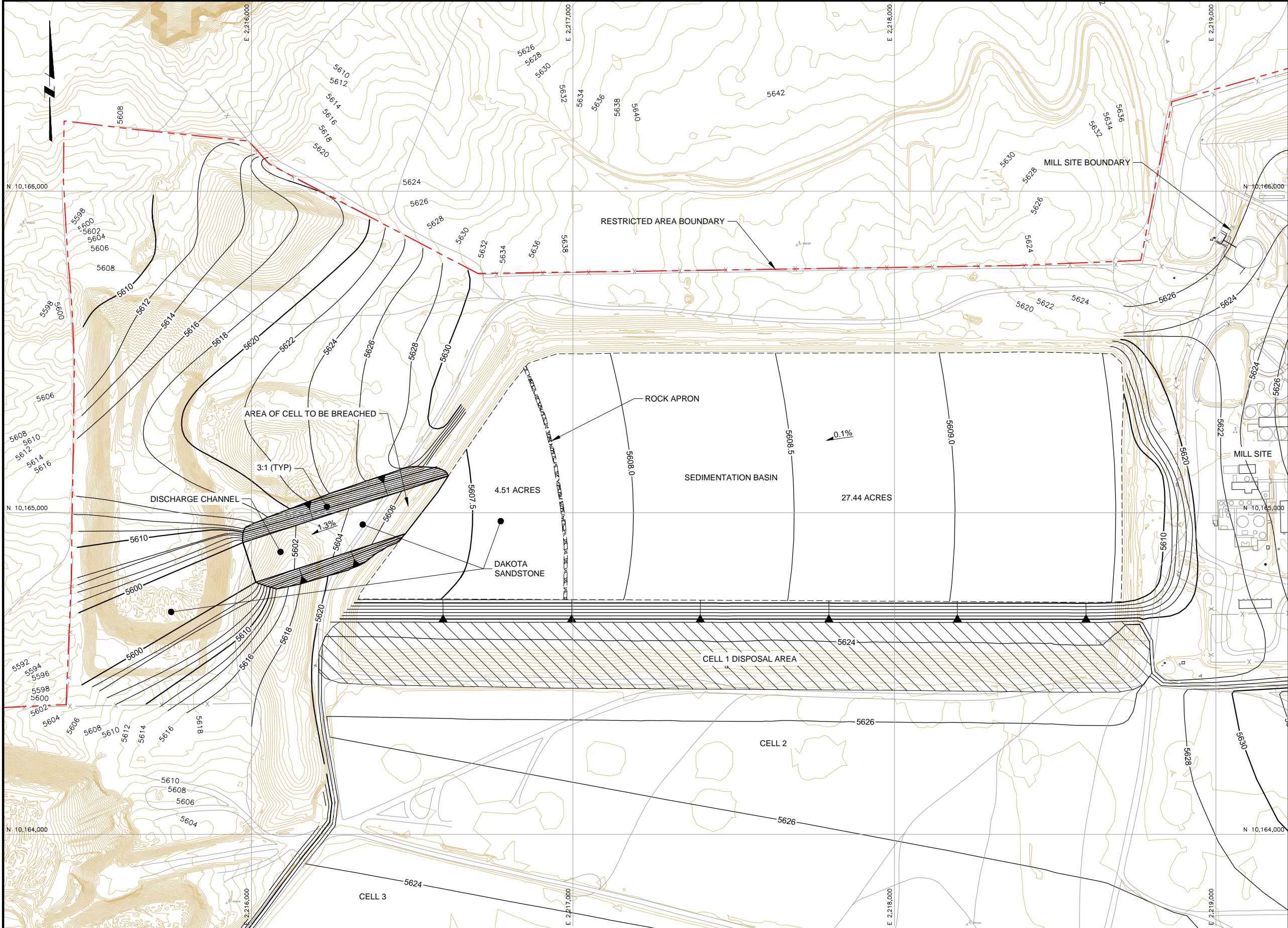
DRAWING REFERENCE(S):
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DESIGNED BY	M DAVIS	08-15
DRAWN BY	D MIRANDA	08-15
CHECKED BY	C STRACHAN	08-15
APPROVED BY	M DAVIS	08-15
PROJECT MANAGER	M DAVIS	08-15
CLIENT APPROVAL		
CLIENT REFERENCE NO.		



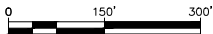
PROJECT LOCATION	BLANDING, UTAH
PROJECT	WHITE MESA MILL TAILINGS RECLAMATION
TITLE	MILL SITE AND ORE PAD AREA GRADING PLAN

SHEET	REC-2	REVISION	B
FILE NAME	WMM REC-2	DATE	AUG 2015



- LEGEND:**
- 5605 EXISTING GROUND SURFACE ELEVATION, FEET (SEE REFERENCE)
 - 5605 FINAL GRADING SURFACE CONTOUR AND ELEVATION, FEET
 - EXISTING ROAD
 - EXISTING WATER
 - EXISTING TRAIL
 - EXISTING FENCE
 - EXISTING STRUCTURE

NOTES:
1. ADAPTED FROM DENISON MINES (USA) CORPORATION FIGURE A-3.2-1. TITLE: MILL SITE AND ORE PAD FINAL GRADING PLAN, DATED FEBRUARY, 1997.



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REV	ISSUE	DESCRIPTION	TECH	ENG	DATE
B	ISSUED WITH EFRI 2015 RESPONSES TO FEB 2013 DRC REVIEW COMMENTS	DM	MD	08-15	
A	ISSUED FOR RECLAMATION PLAN REVISION 5.0	DM	RS	08-11	

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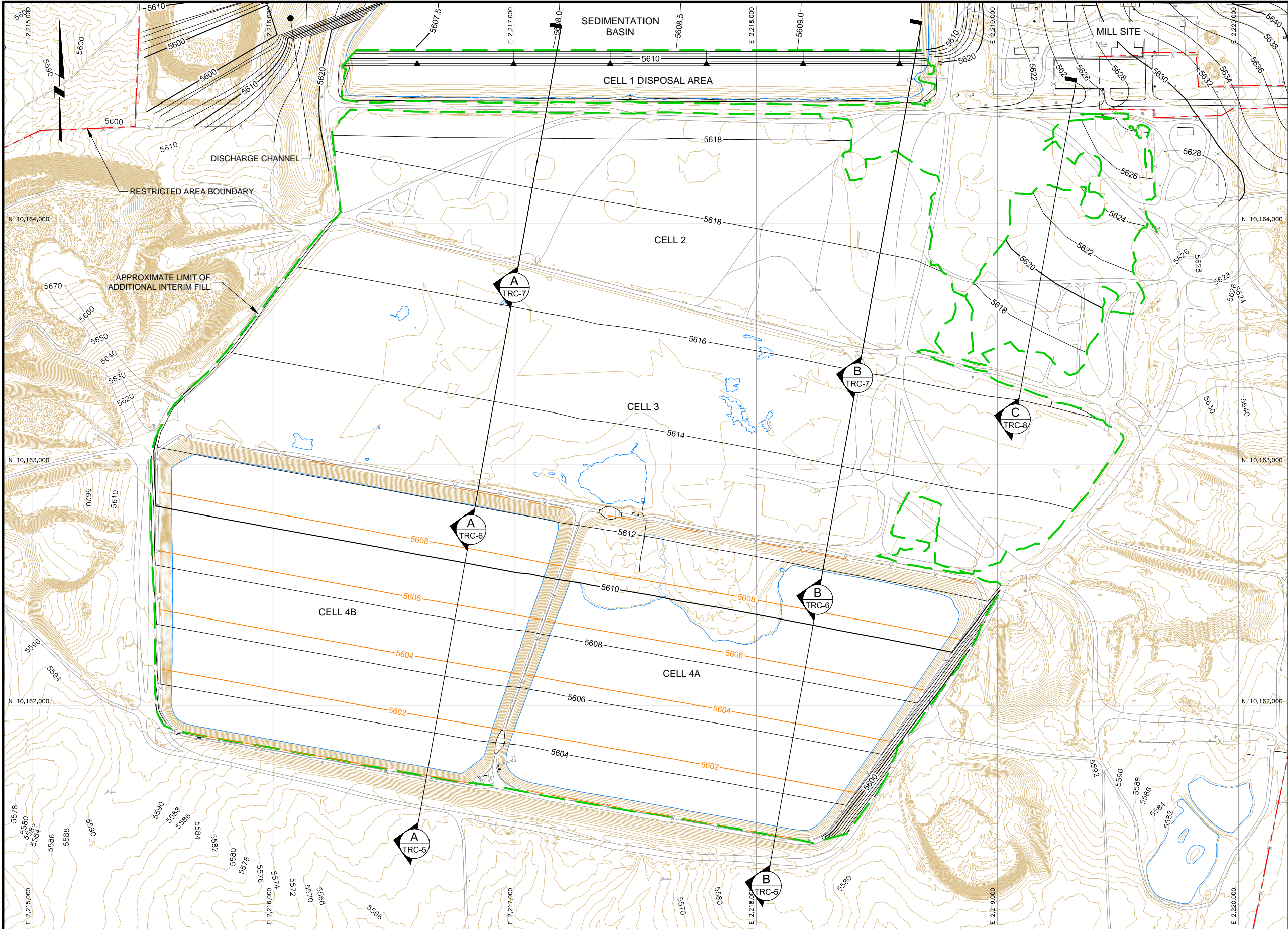
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DESIGNED BY	M DAVIS	08-15
DRAWN BY	D MIRANDA	08-15
CHECKED BY	C STRACHAN	08-15
APPROVED BY	M DAVIS	08-15
PROJECT MANAGER	M DAVIS	08-15
CLIENT APPROVAL		
CLIENT REFERENCE NO.		



PROJECT LOCATION	BLANDING, UTAH
PROJECT	WHITE MESA MILL TAILINGS RECLAMATION
TITLE	SEDIMENTATION BASIN DETAIL

SHEET	REC-3	REVISION	B
FILE NAME	WMM REC-3	DATE	AUG 2015



- LEGEND:**
- 5605 EXISTING GROUND SURFACE ELEVATION, FEET (SEE REFERENCE)
 - 5605 TOP OF INTERIM FILL ELEVATION, FEET
 - 5605 MAXIMUM PERMITTED TAILINGS SURFACE CONTOUR AND ELEVATION, FEET
 - EXISTING ROAD
 - EXISTING WATER
 - EXISTING TRAIL
 - X EXISTING FENCE
 - EXISTING STRUCTURE

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REV	DESCRIPTION	TECH	ENG	DATE
B	ISSUED WITH EFRI 2015 RESPONSES TO FEB 2013 DRC REVIEW COMMENTS	DM	MD	08-15
A	ISSUED FOR RECLAMATION PLAN REVISION 5.0	DM	RS	08-11

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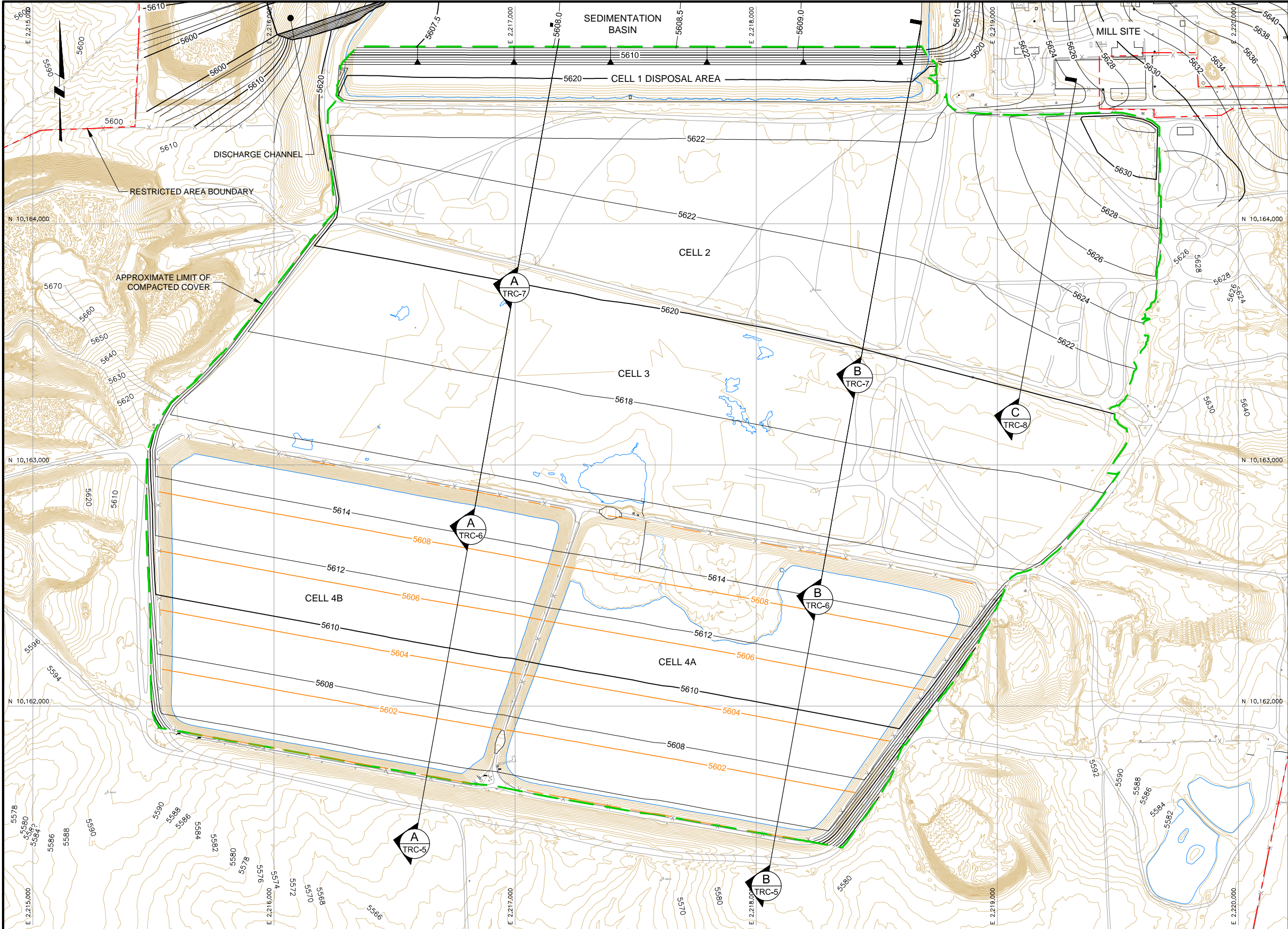
DESIGNED BY	M DAVIS	08-15
DRAWN BY	D MIRANDA	08-15
CHECKED BY	C STRACHAN	08-15
APPROVED BY	M DAVIS	08-15
PROJECT MANAGER	M DAVIS	08-15
CLIENT APPROVAL		
CLIENT REFERENCE NO.		



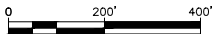
PROJECT LOCATION	BLANDING, UTAH
PROJECT	WHITE MESA MILL TAILINGS RECLAMATION
TITLE	INTERIM FILL GRADING PLAN

SHEET	TRC-1	REVISION	B
FILE NAME	WMM TRC-1	DATE	AUG 2015





- LEGEND:**
- 5605 EXISTING GROUND SURFACE ELEVATION, FEET (SEE REFERENCE)
 - 5605 TOP OF COMPACTED COVER ELEVATION, FEET
 - 5605 MAXIMUM PERMITTED TAILINGS SURFACE CONTOUR AND ELEVATION, FEET
 - EXISTING ROAD
 - EXISTING WATER
 - EXISTING TRAIL
 - X EXISTING FENCE
 - EXISTING STRUCTURE



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REV	DESCRIPTION	TECH	ENG	DATE
B	ISSUED WITH EFRI 2015 RESPONSES TO FEB 2013 DRC REVIEW COMMENTS	DM	MD	08-15
A	ISSUED FOR RECLAMATION PLAN REVISION 5.0	DM	RS	08-11

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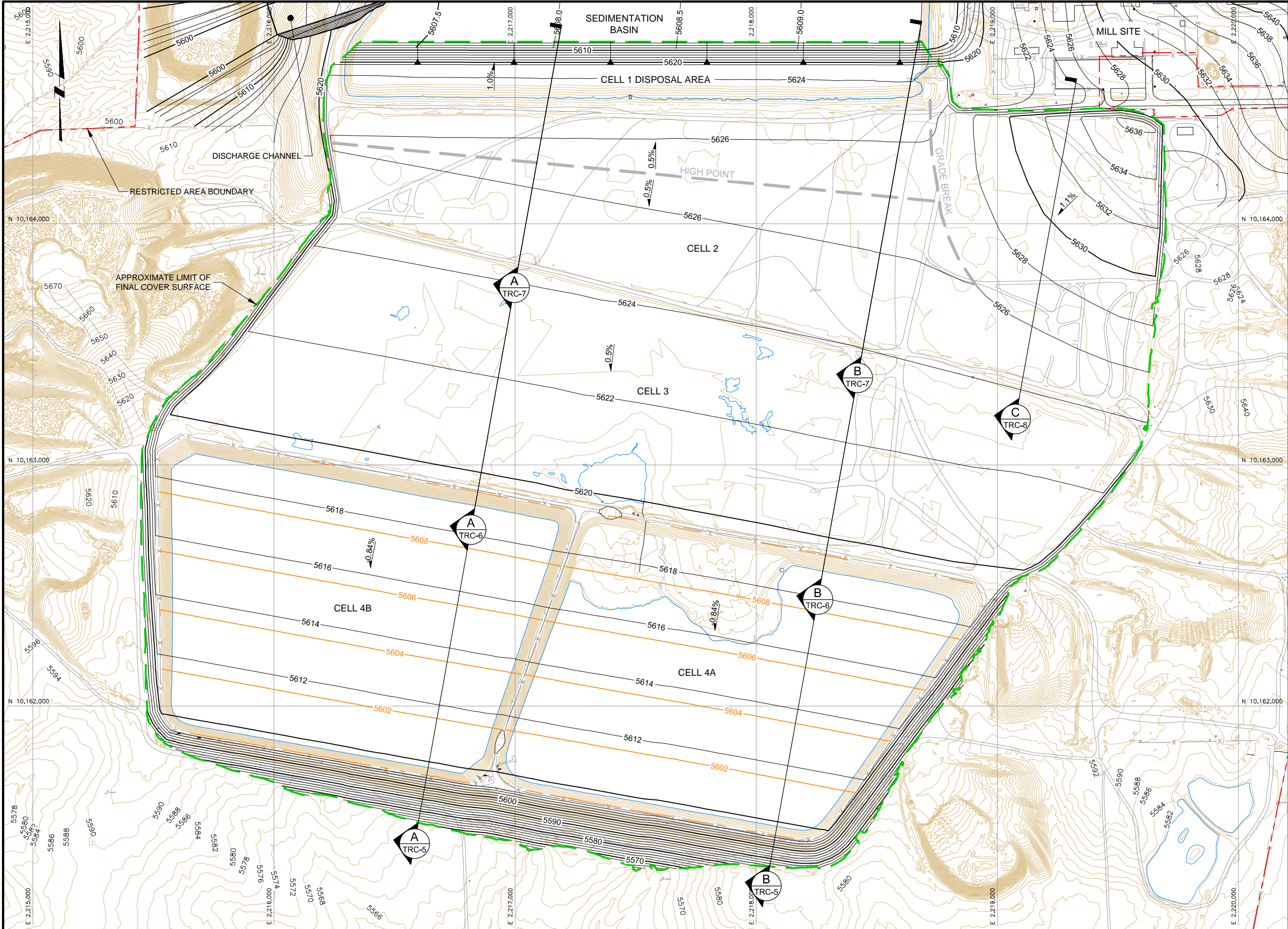
DESIGNED BY	M DAVIS	08-15
DRAWN BY	D MIRANDA	08-15
CHECKED BY	C STRACHAN	08-15
APPROVED BY	M DAVIS	08-15
PROJECT MANAGER	M DAVIS	08-15
CLIENT APPROVAL		
CLIENT REFERENCE NO.		



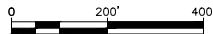
PROJECT LOCATION	BLANDING, UTAH
PROJECT	WHITE MESA MILL TAILINGS RECLAMATION
TITLE	COMPACTED COVER GRADING PLAN

SHEET	TRC-2	REVISION	B
FILE NAME	WMM TRC-2	DATE	AUG 2015





- LEGEND:**
- 5605 EXISTING GROUND SURFACE ELEVATION, FEET (SEE REFERENCE)
 - 5605 TOP OF FINAL COVER ELEVATION, FEET
 - 5605 MAXIMUM PERMITTED TAILINGS SURFACE CONTOUR AND ELEVATION, FEET
 - EXISTING ROAD
 - EXISTING WATER
 - EXISTING TRAIL
 - X EXISTING FENCE
 - EXISTING STRUCTURE



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REV	DESCRIPTION	TECH	ENG	DATE
B	ISSUED WITH EFRI 2015 RESPONSES TO FEB 2013 DRC REVIEW COMMENTS	DM	MD	08-15
A	ISSUED FOR RECLAMATION PLAN REVISION 5.0	DM	RS	08-11

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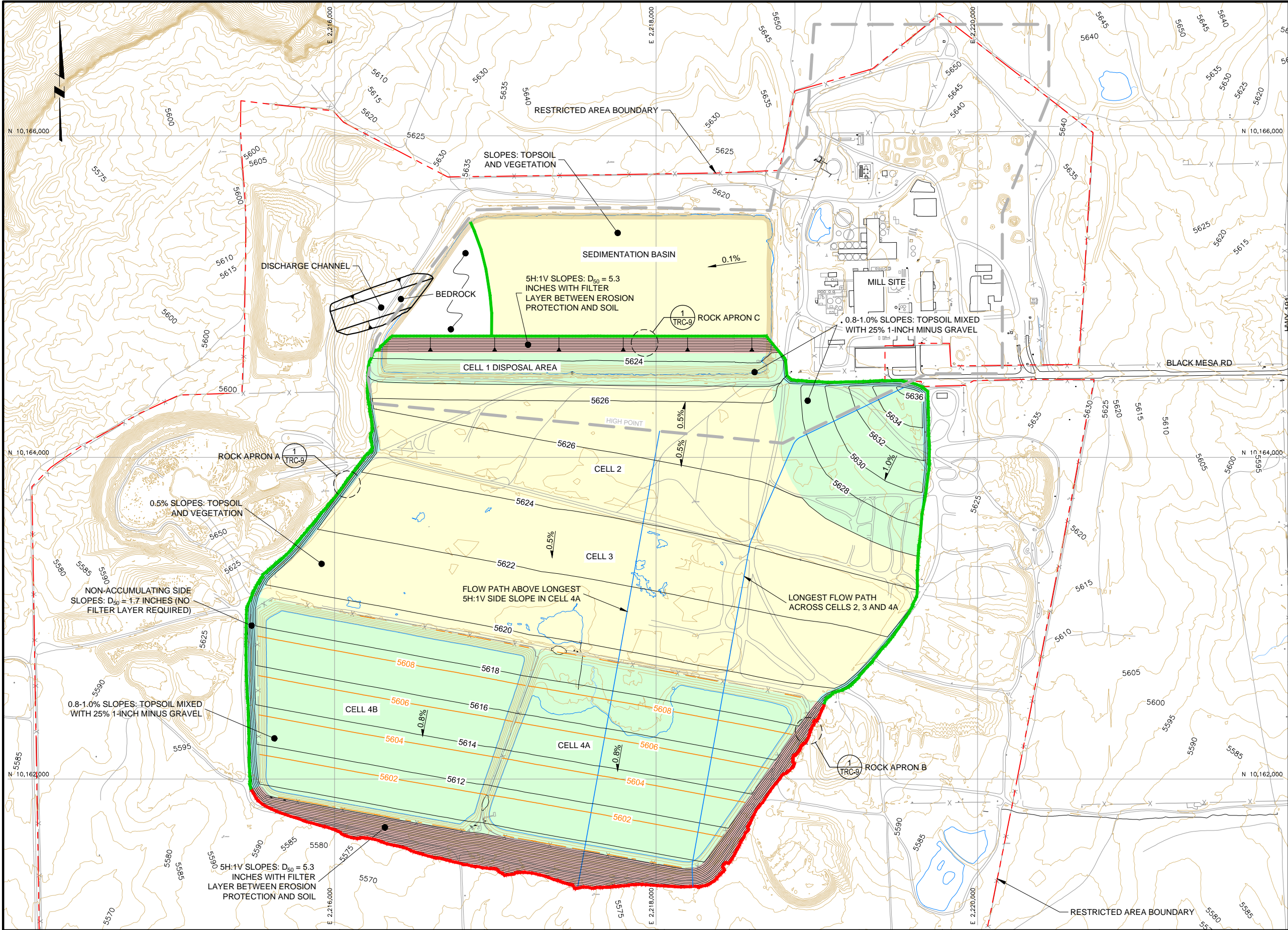
DESIGNED BY	M DAVIS	08-15
DRAWN BY	D MIRANDA	08-15
CHECKED BY	C STRACHAN	08-15
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PROJECT MANAGER	M DAVIS	08-15
CLIENT APPROVAL		
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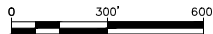
PROJECT LOCATION	BLANDING, UTAH
PROJECT	WHITE MESA MILL TAILINGS RECLAMATION
TITLE	FINAL COVER SURFACE LAYOUT

SHEET	TRC-3	REVISION	B
FILE NAME	WMM TRC-3	DATE	AUG 2015





- LEGEND:**
- 5605 EXISTING GROUND SURFACE ELEVATION, FEET (SEE REFERENCE)
 - 5605 TOP ON INTERIM FILL ELEVATION, FEET
 - 5605 MAXIMUM PERMITTED TAILINGS SURFACE CONTOUR AND ELEVATION, FEET
 - EXISTING ROAD
 - EXISTING WATER
 - EXISTING TRAIL
 - X EXISTING FENCE
 - EXISTING STRUCTURE



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REV	DESCRIPTION	TECH	ENG	DATE
B	ISSUED WITH EFRI 2015 RESPONSES TO FEB 2013 DRC REVIEW COMMENTS	DM	MD	08-15
A	ISSUED FOR RECLAMATION PLAN REVISION 5.0	DM	RS	08-11

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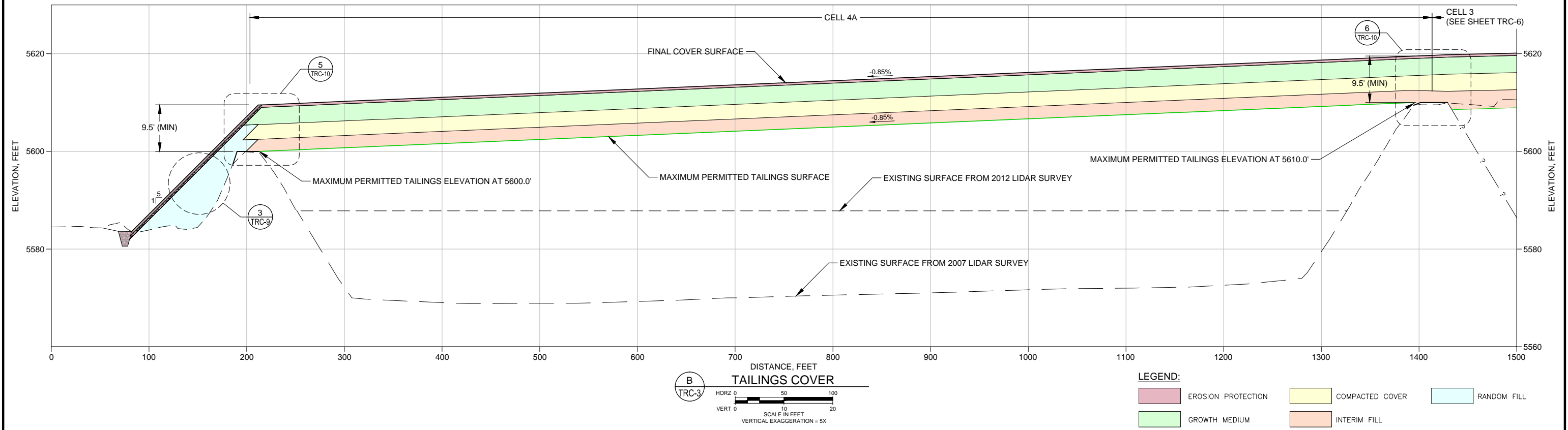
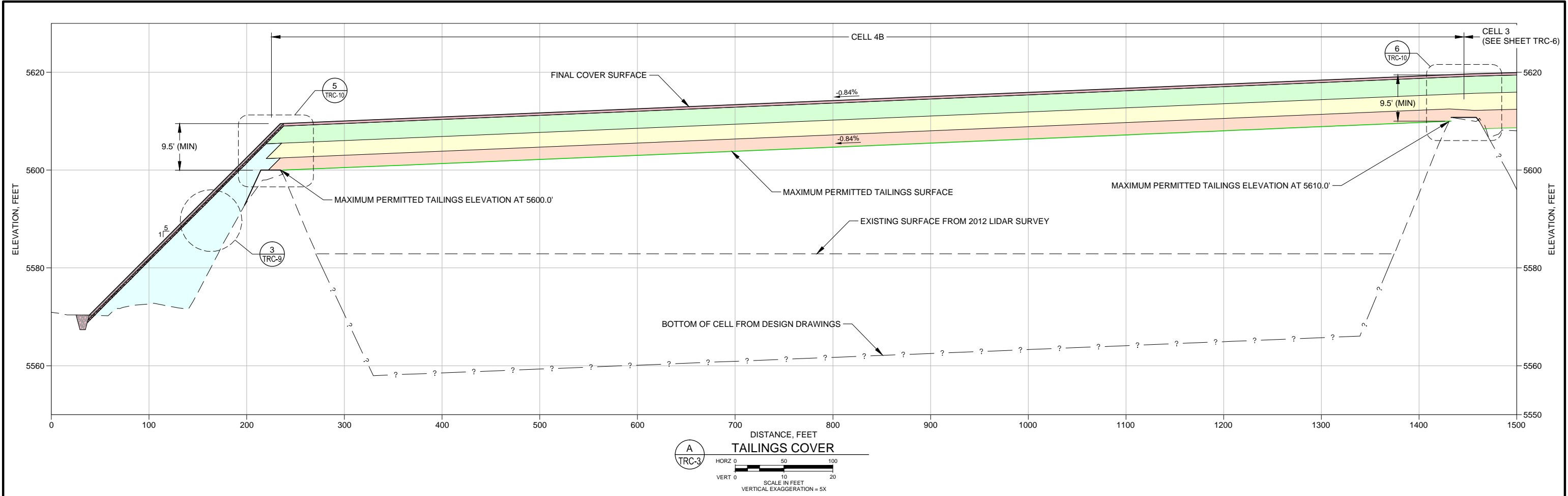
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DRAWN BY	D MIRANDA	08-15
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APPROVED BY	M DAVIS	08-15
PROJECT MANAGER	M DAVIS	08-15
CLIENT APPROVAL		
CLIENT REFERENCE NO.		

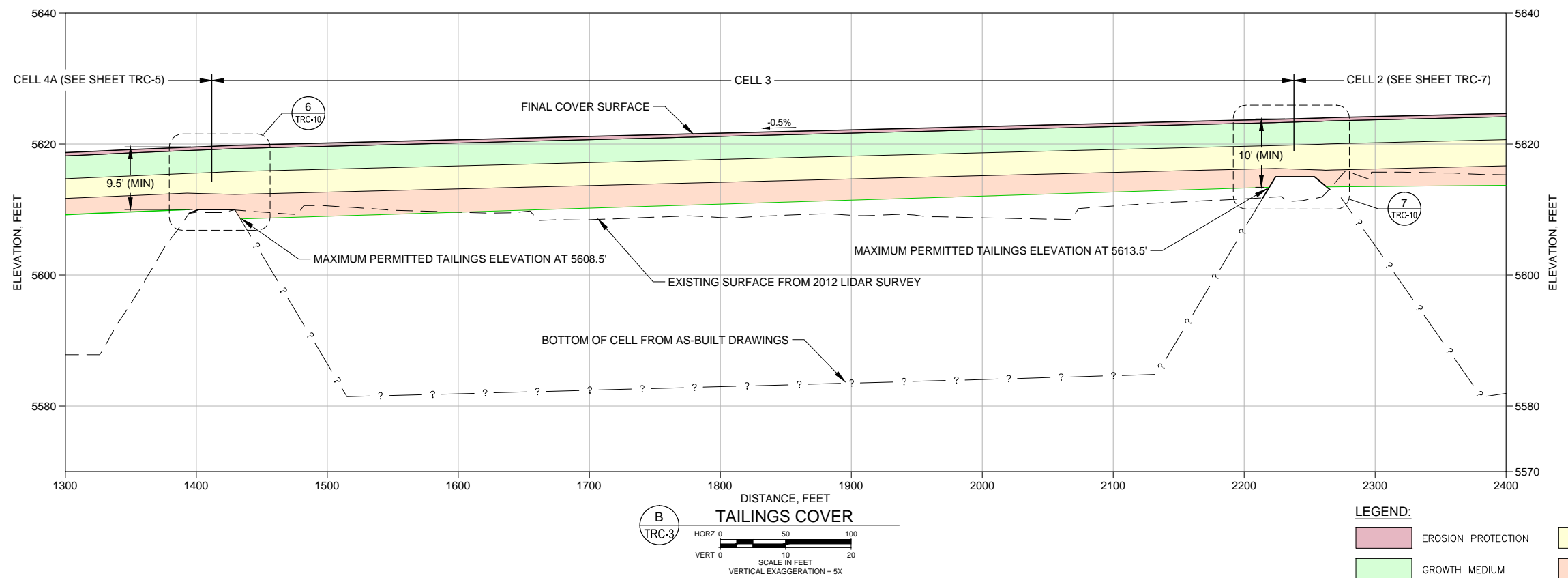
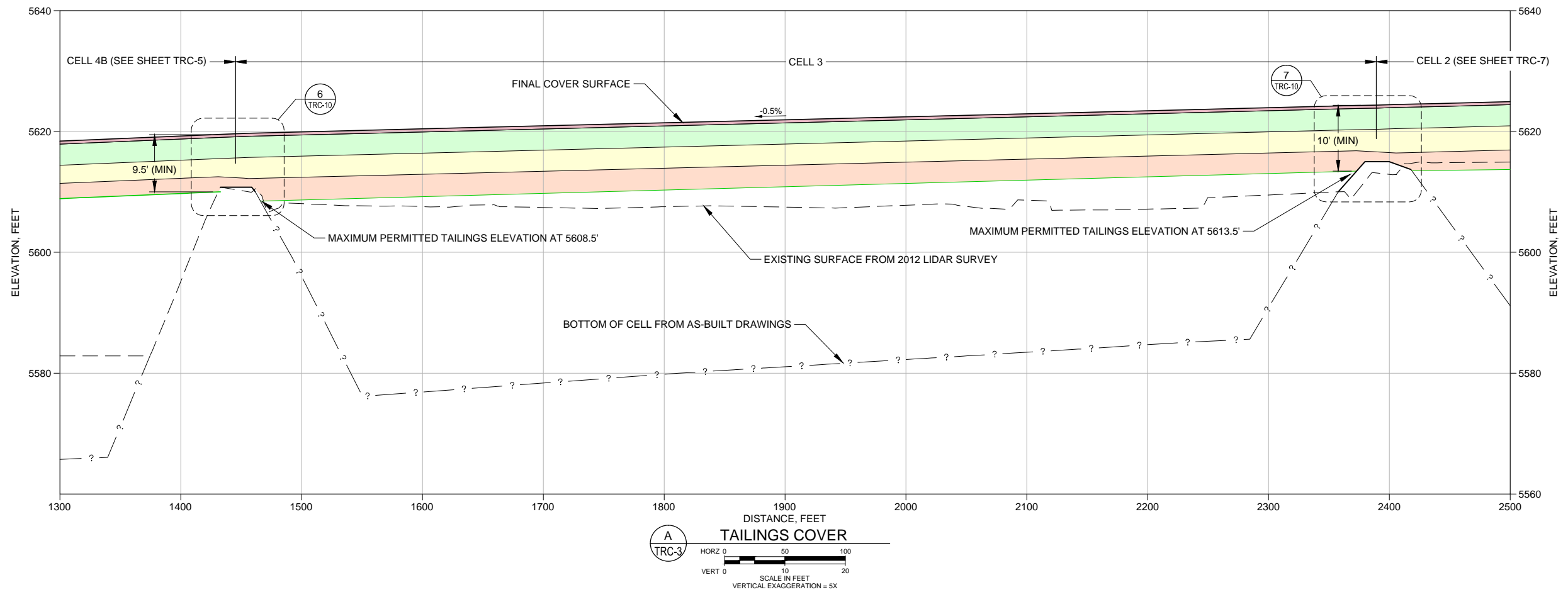


PROJECT LOCATION	BLANDING, UTAH
PROJECT	WHITE MESA MILL TAILINGS RECLAMATION
TITLE	RECLAMATION COVER EROSION PROTECTION
SHEET	TRC-4
FILE NAME	WMM TRC-4
REVISION	B
DATE	AUG 2015









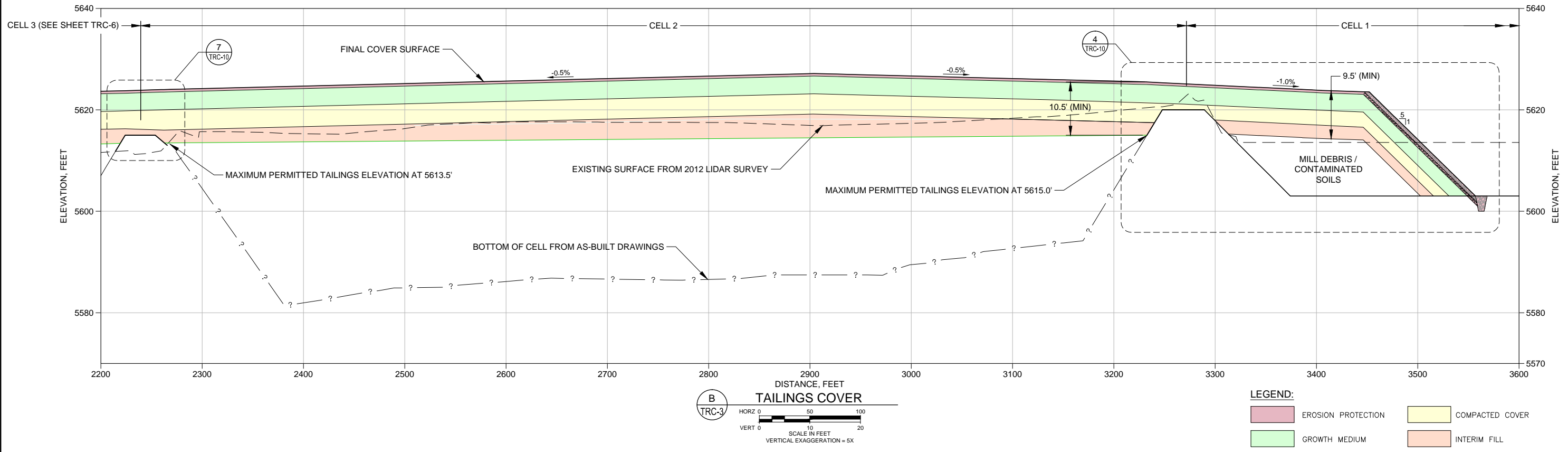
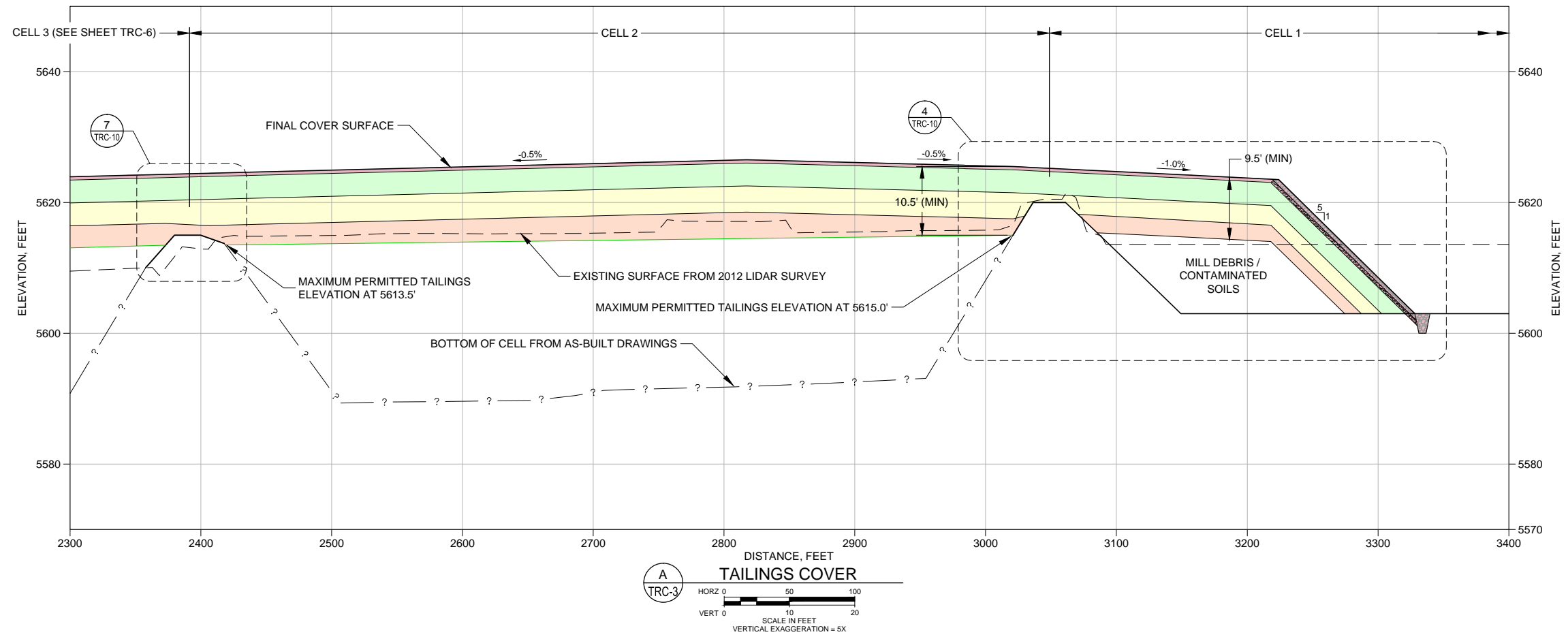
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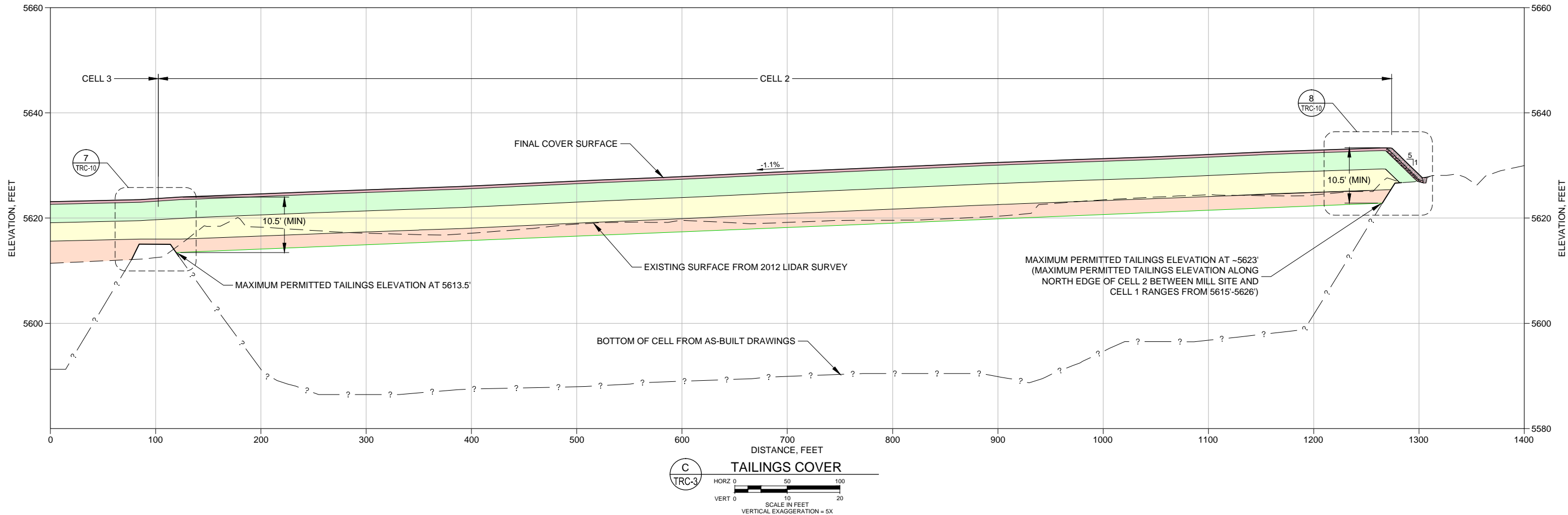




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PROJECT LOCATION	BLANDING, UTAH
PROJECT	WHITE MESA MILL TAILINGS RECLAMATION
TITLE	COVER OVER CELL 2 CROSS SECTION

SHEET	TRC-8	REVISION	B
FILE NAME	WMM TRC-5	DATE	AUG 2015

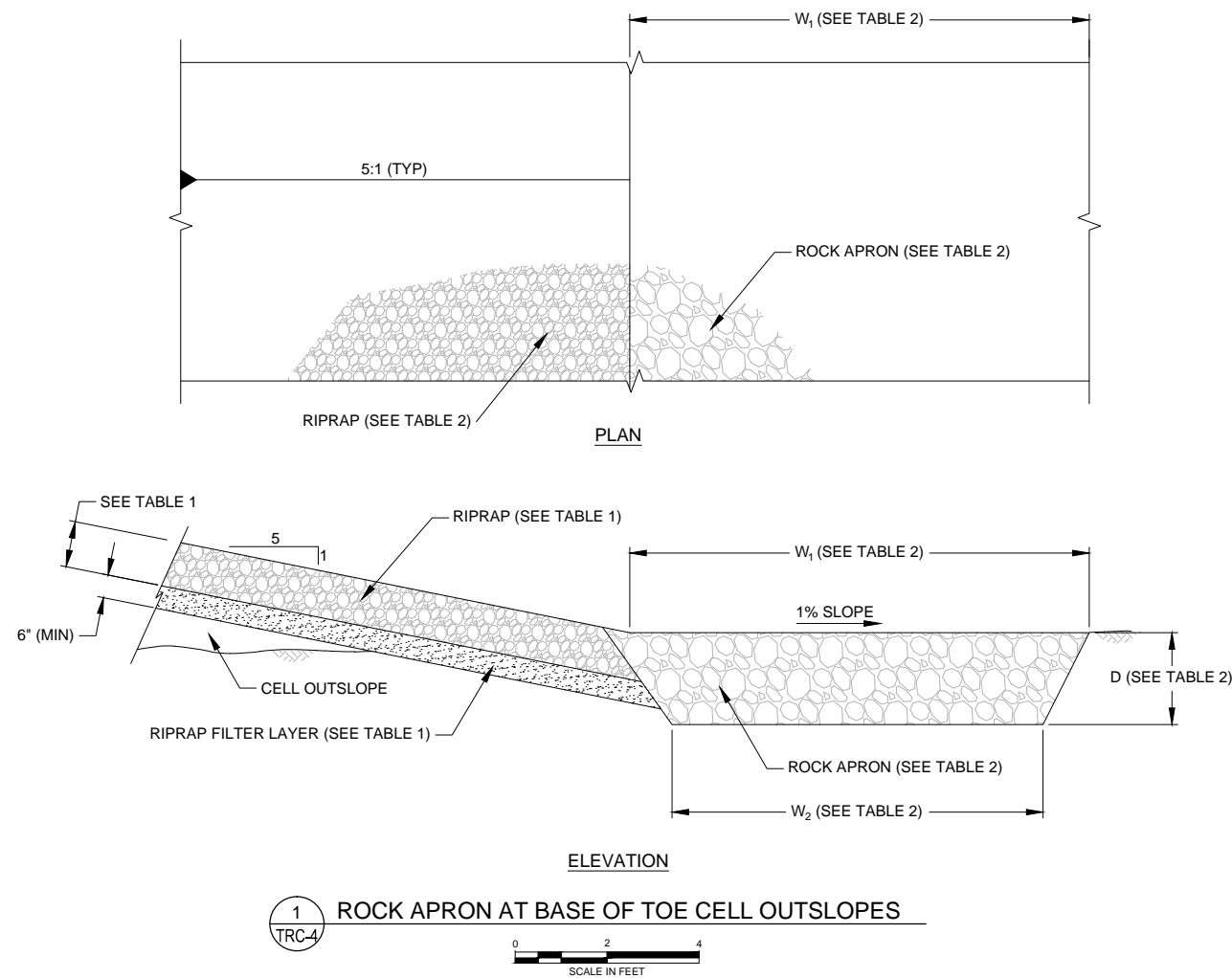
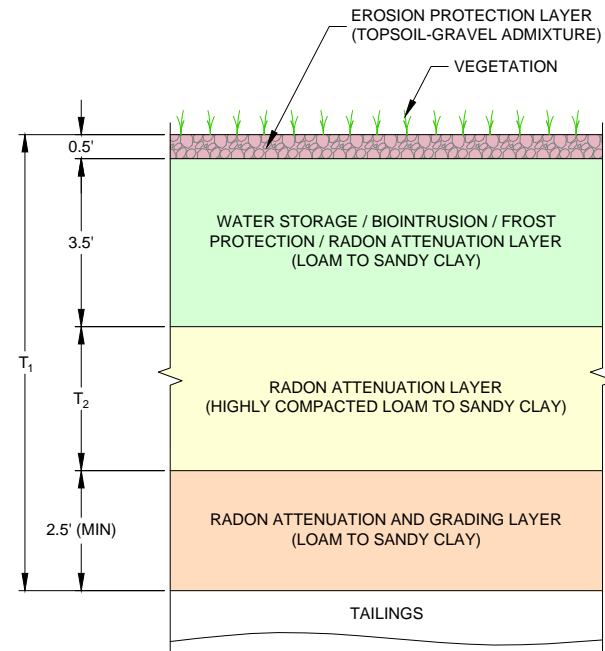


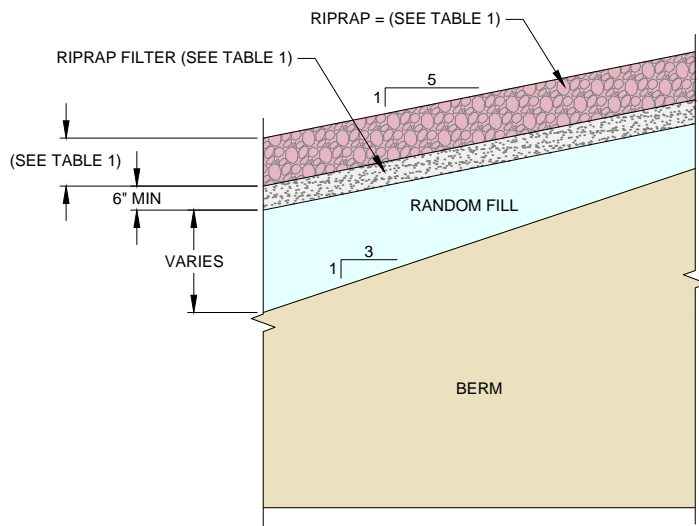
TABLE 1 - RIPRAP ON SIDE SLOPES				
SIDE SLOPE AREA	RIPRAP D ₅₀		FILTER	
	D ₅₀	THICKNESS	D ₁₀₀	THICKNESS
EAST & WEST SIDES	1.7"	6"	(NOT NEEDED)	-
CELL 4A & 4B SOUTHERN	5.3"	8"	3"	6"
CELL 1 DISPOSAL AREA	5.3"	8"	3"	6"

TABLE 2 - ROCK APRON SCHEDULE				
ROCK APRON TYPE	APRON RIPRAP D ₅₀	(MINIMUM)		
		W ₁	W ₂	DEPTH (D)
A	3.4"	4.5'	2.5'	1'
B	10.6"	13.5'	7.5'	3'
C	9.0"	11.5'	5.5'	3'



COVER THICKNESS TABLE		
CELL	COVER (T ₁)	RADON ATTENUATION LAYER (T ₂)
1	9.5'	3.0'
2	10.5'	4.0'
3	10.0'	3.5'
4A & 4B	9.5'	3.0'

2 COVER DETAIL FOR TOP SURFACE OF TAILINGS CELLS AND CELL 1 DISPOSAL AREA
NOT TO SCALE



LEGEND:	
	EROSION PROTECTION
	GROWTH MEDIUM
	COMPACTED COVER
	INTERIM FILL
	RANDOM FILL

3 COVER DETAIL FOR SIDE SLOPES
NOT TO SCALE

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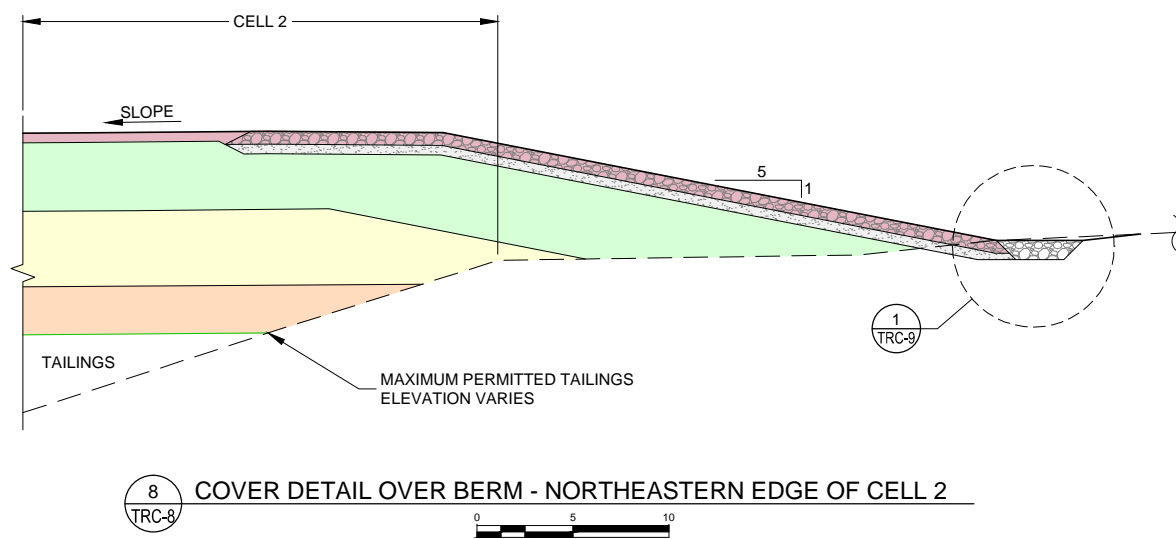
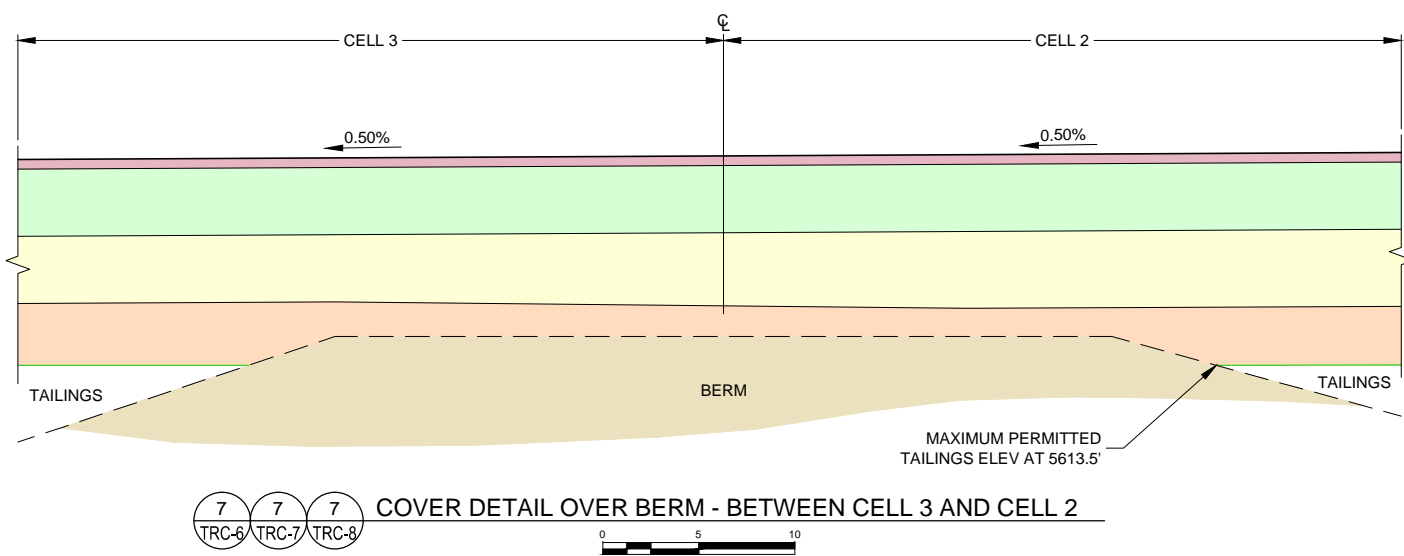
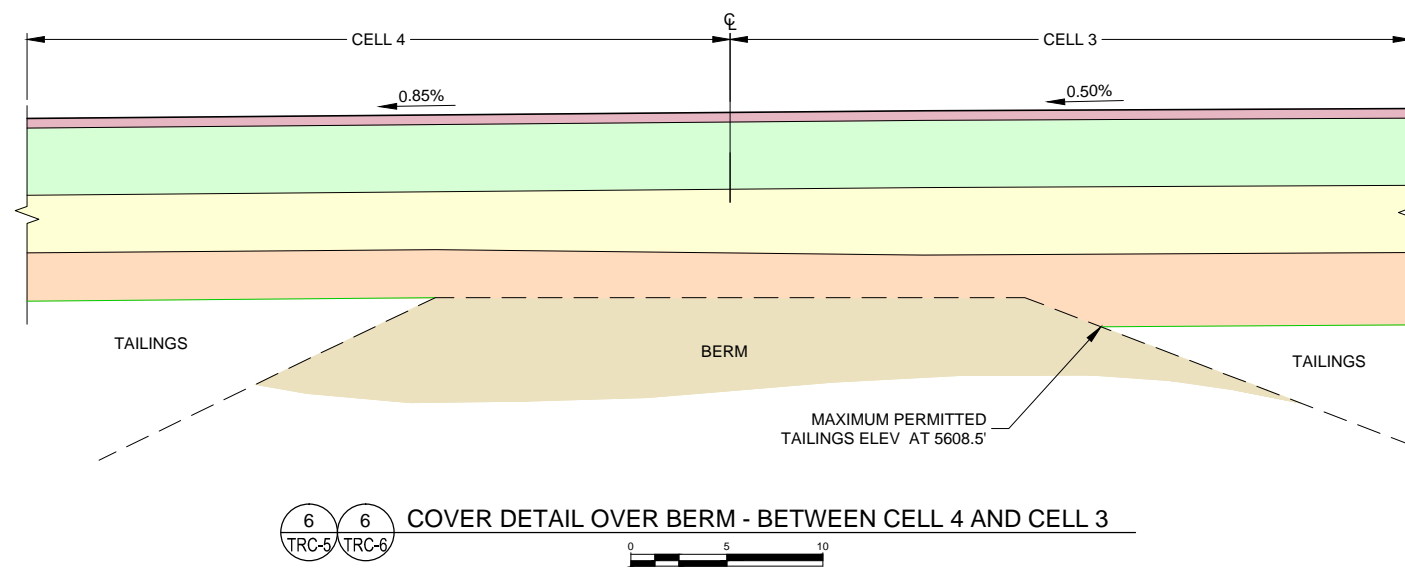
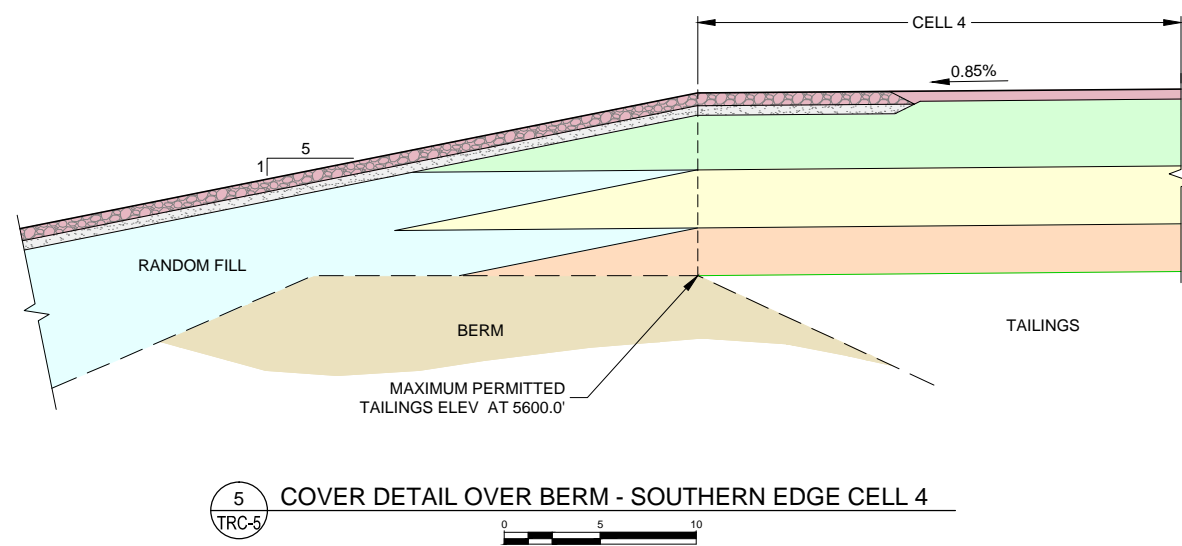
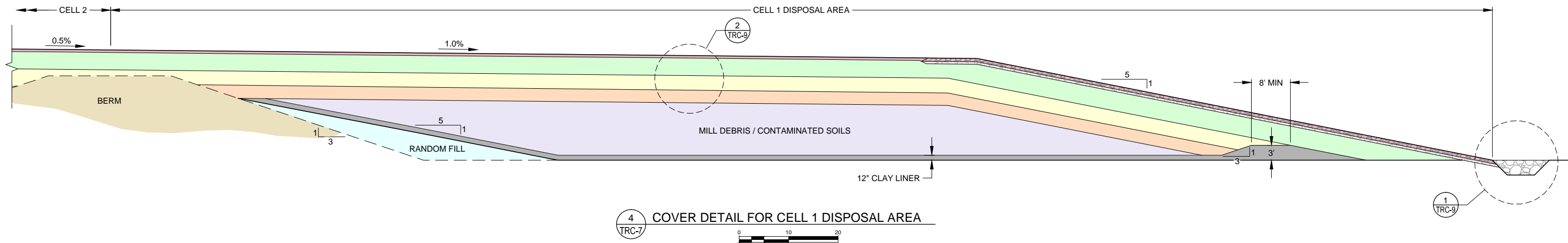
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Energy Fuels Resources (USA) Inc.

PROJECT LOCATION	BLANDING, UTAH
PROJECT	WHITE MESA MILL TAILINGS RECLAMATION
TITLE	RECLAMATION COVER DETAILS (SHEET 1 OF 2)

SHEET	TRC-9
REVISION	B
FILE NAME	WMM TRC-9
DATE	AUG 2015



- LEGEND:**
- EROSION PROTECTION
 - GROWTH MEDIUM
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PROJECT	WHITE MESA MILL TAILINGS RECLAMATION
TITLE	RECLAMATION COVER DETAILS (SHEET 2 OF 2)
FILE NAME	WMM TRC-10

SHEET	TRC-10	REVISION	B
DATE	AUG 2015		



ATTACHMENT C

SUPPORTING DOCUMENTATION FOR INTERROGATORY 03/1, 04/1, AND 13/1:

**REVISED TECHNICAL SPECIFICATIONS AND CONSTRUCTION QUALITY
ASSURANCE/ QUALITY CONTROL PLAN TO ATTACHMENT A AND B OF
RECLAMATION PLAN, REVISION 5.0**

ATTACHMENT C.1

**REVISED TECHNICAL SPECIFICATIONS AND CONSTRUCTION QUALITY
ASSURANCE/ QUALITY CONTROL PLAN TO ATTACHMENT A OF RECLAMATION
PLAN, REVISION 5.0**

**PLANS AND TECHNICAL SPECIFICATIONS FOR
RECLAMATION OF WHITE MESA MILL FACILITY
BLANDING, UTAH**

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1.0 SPECIAL PROVISIONS

1.1 Scope of Document

The following technical specifications have been prepared for reclamation and decommissioning of the Energy Fuels Resources (USA) Inc. ("EFRI"), White Mesa Uranium Mill Facility ("Mill") in Blanding, Utah. These technical specifications have been prepared for review and approval by the Utah Department of Environment Quality ("DEQ"), Division of Waste Management and Radiation Control ("DWMRC") and are submitted as an attachment to the Reclamation Plan. The design drawings for reclamation are included in this attachment and are designated as the "Drawings". The Construction Quality Assurance/Quality Control Plan ("CQA/QC Plan") referenced in this document is provided as Attachment B to the Reclamation Plan.

These technical specifications have been written assuming (a) a contractor will conduct tailings impoundment reclamation under contract with EFRI and under EFRI's direction, and (b) the work quality will be checked with independent (third-party) construction quality assurance.

1.2 Definitions and Roles

Construction Quality Assurance (CQA) – A planned and systematic pattern of means and actions designed to assure adequate confidence that the materials or services meet contractual and regulatory requirements and will perform satisfactorily in service. CQA refers to means and actions employed by the involved parties to assure conformity of the project work with the CQA/QC Plan, the Drawings, and the Technical Specifications.

Construction Quality Control (CQC) – Actions which provide a means to measure and regulate the characteristics of an item or service in relation to contractual and regulatory requirements. CQC refers to those actions taken by the Contractor, technicians, or other involved parties to verify that the materials and the workmanship meet the requirements of the CQA/QC Plan, the Drawings, and the Technical Specifications.

Technical Specifications – The document that prescribes the requirements and standards for the specific elements of the reclamation. The Technical Specifications will be prepared in final form

prior to commencement of reclamation activities.

Drawings – The detailed project drawings to be used in conjunction with the Technical Specifications. The Drawings will be prepared in final form as construction drawings prior to reclamation.

Construction Project – The total authorized/approved reclamation project that requires several construction segments to complete.

Construction Segment – A portion of the total construction project involving a specific area or type of work. Several construction segments will likely take place simultaneously during reclamation.

Construction Task – A basic construction feature of a construction segment involving a specific construction activity.

ASTM Standards – The latest versions of the American Society for Testing and Materials specifications, procedures and methods.

For these Technical Specifications, EFRI is referred to as the **Owner**, with overall responsibility for closure, as well as site reclamation.

The on-site **Construction Manager** is responsible for the conduct, direction and supervision of all reclamation activities as detailed in the Drawings and Technical Specifications.

The **Design Engineer** is responsible for the design of the various elements of the reclamation project and for preparing the Drawings and Technical Specifications.

The **Contractor** is defined as the group (or groups) selected by EFRI and responsible for conducting the work tasks outlined in Section 1.3 under the direction of, and under contract with EFRI.

The **Surveyor** is a party, independent from the Owner or Contractor, who is responsible for surveying, documenting, and verifying the location of all significant components of the work.

The **CQA/QC Consultant** is a party, independent from the Owner or Contractor, who is responsible for observing, testing, and documenting the various activities comprising the Reclamation Project in accordance with the CQA/QC Plan, the Technical Specifications and the Drawings.

The **CQA Officer** will be responsible for overall implementation and management of the CQA/QC Plan for the reclamation project.

The **CQA Site Manager** will be appointed by the CQA Consultant to provide day-to-day, on-site oversight of the CQA/CQC activities. The CQA Manager could be an EFRI employee or a third-party consultant.

The CQA Consultant will utilize various **QC Technicians** to assist the on-site CQA Site Manager to perform specific tasks through the project to verify the adequacy of construction materials and procedures.

The **Document Control Officer** will be appointed by the Construction Manager to assist with managing the various documents that will be produced throughout the project.

The **CQA Laboratory** is a party, independent from the Owner and Contractor, responsible for conducting tests of soils and other project materials in accordance with ASTM and other applicable standards in either an on-site or off-site laboratory.

The **DWMRC Project Manager** will represent the DWMRC's interests in the reclamation project.

The CQA/QC Plan (Attachment B of the 2011 Reclamation Plan) contains more detailed descriptions of the project roles.

1.3 Scope of Work

The work outlined in these Technical Specifications consists of execution of the following tasks associated with reclamation of the disposal cells and associated site reclamation.

- a. Preparation of borrow areas for material excavation by removal of vegetation; and stripping, salvaging, and stockpiling of topsoil;
- b. Preparation of material staging and stockpile areas by removal of vegetation; stripping, salvaging, and stockpiling of topsoil; and providing for storm water diversion and internal water collection;
- c. Removal of raffinates and PVC liner materials from Cell 1 and placement within the last active tailings cell;
- d. Construction of a clay-lined disposal cell along the Cell 1 containment dike for disposal of mill demolition debris and contaminated soils;
- e. Construction of a sedimentation basin in the location of Cell 1;
- f. Excavation of process area structure foundations, paved areas, concrete pads and roadways, and placement of these materials in the disposal cell;
- g. Excavation of contaminated subsoils from the process area, and placement in the last active tailings cell or the Cell 1 Disposal Area.
- h. Construction of the cover system over the tailings cells, with placement of rock mulch and/or topsoil over the disposal cell cover surface.
- i. Regrading and placement of topsoil over excavated areas, stockpile and staging areas, and other disturbed areas of the site.
- j. Establishment of vegetation on the disposal cell surface and surrounding reclaimed areas on site.

Work not included in these Technical Specifications consists of salvage of facility equipment, demolition of facility structures, groundwater monitoring and remediation, and post-reclamation performance monitoring.

1.4 Applicable Regulations and Standards

The work shall conform to applicable Federal, State, and County environmental and safety regulations. The work shall conform to applicable conditions in the Owner's radioactive materials license. Geotechnical testing procedures shall conform to applicable ASTM standards, as documented in the most current edition of standards in force at the start of work. Personnel

safety procedures and monitoring shall be conducted in accordance with the Owner's Radiation Protection Manual for Reclamation and as directed by the Radiation Safety Officer (RSO).

1.5 Permits

The work will be conducted under the Owner's existing radioactive materials license and State of Utah Air Quality Approval Order (DAQE-AN0112050018-11, issue date March 3, 2011). The Contractor will be responsible for applying for, and obtaining (permit fees included), all other necessary permits required to complete the work outlined in these Technical Specifications.

1.6 Inspection and Quality Assurance

In general, the QA/QC Plan details the Owner's organizational structure and responsibilities, qualifications of personnel, operating procedures and instructions, record keeping and document control, and quality control in the sampling procedure and outside laboratory. The Plan will adopt the existing quality assurance/quality control procedures utilized in compliance with the existing license.

The RSO (and approved assistants as needed) will conduct on-site training, and full-time personnel monitoring, and inspection of construction activities while the site reclamation work is in progress. The RSO (and assistants) will be independent representatives of and appointed by the Owner. The responsibilities and duties of the RSO shall be as outlined in the Owner's Protection Manual for Reclamation.

The CQA Manager (and approved assistants as needed) will provide full-time, on-site inspection of all construction activities and quality assurance testing outlined in these Technical Specifications and the CQA/QC Plan while the construction work is in progress. The CQA Manager and assistants will be independent representatives of and appointed by the Owner. The inspection and CQA testing conducted by the CQA Manager shall be under the supervision of the Reclamation Project Manager. Inspection and CQA testing shall include the tasks described in the CQA/QC Plan and listed below.

- a. Observation of construction practices and procedures for conformance with the Technical Specifications.
- b. Testing material characteristics to ensure that earthen materials used in the construction conform to the requirements in the Technical Specifications.
- c. Documentation of construction activities, test locations, samples, and test results.
- d. Notification of results from quality assurance testing to the Owner and the Contractor.
- e. Documentation of field design modifications or approved construction work that deviates from the Technical Specifications.

The CQA Manager shall record the documentation outlined above on a daily basis. The Reclamation Project Manager shall approve deviations from the Technical Specifications (if necessary), with notification to the Owner and DWMRC or other appropriate Utah state regulatory agency personnel. Quality control procedures have been developed for reclamation and presented in Attachment B of this Reclamation Plan. Procedures will be used for testing, sampling, and inspection functions.

1.7 Construction Documentation

During construction, the CQA Manager will record documentation of construction inspection work on a daily basis. Documentation will include the following items.

- a. Work performed by the Contractor.
- b. CQA testing and surveying work conducted.
- c. Discussions with the Owner and the Contractor.
- d. Key decisions, important communications, or design modifications.
- e. General comments including: weather conditions, work area surface conditions, and visitors to the site.

All earthwork test results will be documented on a daily basis, with a copy of the results given to the CQA Manager by the end of the following working day after the testing.

The CQA Manager or his representative will take photographs of key construction activities and critical items for documentation.

A final construction completion report, documenting the as-built conditions of the tailings impoundment reclamation components will be submitted to DWMRC at the end of construction. This report will include the following items.

- a. All design modifications or changes to the Technical Specifications that were made during construction.
- b. An as-built layout of the facility prior to, and at the completion of reclamation construction.
- c. An as-built layout of other reclaimed areas of the site.
- d. Documentation of soil cleanup verification work (soil radiation survey and soil sampling and analyses) in areas of contaminated soil excavation.
- e. Documentation of the revegetation work (soil amendments, seed mix, and vegetation establishment).

1.8 Design Modifications

Design modifications (due to unanticipated site conditions or field improvements to the design) will be made following the protocol outlined below.

- a. Communication of modification with the Reclamation Project Manager.
- b. Submittal to, and review by, DWMRC for approval.
- c. Documentation of modification(s) in the construction completion report.

1.9 Environmental Requirements

The Contractor shall store materials, confine equipment, and maintain construction operations according to applicable laws, ordinances, or permits for the project site. Fuel, lubricating oils, and chemicals shall be stored and dispensed in such a manner as to prevent or contain spills and prevent said liquids from reaching local streams or groundwater. If quantities of fuel, lubricating oils or chemicals exceed the threshold quantities specified in Utah regulations, the Contractor

shall prepare and follow a Spill Prevention Control and Countermeasures Plan (SPCCP), as prescribed in applicable Utah regulations. The Owner shall approve said plan. Used lubricating oils shall be disposed of or recycled at an appropriate facility. Disposal of all waste associated with the project work will be the responsibility of the Contractor.

1.10 Water Management

The Contractor shall construct and maintain all temporary diversion and protective works required to divert storm water from around work areas. The Contractor shall furnish, install, maintain, and operate all equipment required to keep excavations and other work areas free from water in order to construct the facilities as specified.

Water required by the Contractor for dust suppression or soil-moisture conditioning shall be obtained from the Owner.

1.11 Historical and Archeological Considerations

The Contractor shall immediately notify the Owner if materials of potential historical or archeological significance are discovered or uncovered. The Owner may stop work in a specific area until the materials can be evaluated for historical, cultural, or archeological significance. All materials determined to be of significance shall be protected as determined by appropriate regulatory agencies, including removal or adjustment of work areas.

1.12 Health and Safety Requirements

Work outlined in these Technical Specifications shall be conducted under the Owner's Radiation Protection Manual for Reclamation, as directed by the RSO.

The Contractor shall suspend construction or demolition operations or implement necessary precautions whenever (in the opinion of the Reclamation Project Manager or RSO), unsatisfactory conditions exist due to rain, snow, wind, cold temperatures, excessive water, or unacceptable traction or bearing capacity conditions. The CQA Manager, Reclamation Project

Manager, and RSO each have the authority to stop Contractor work if unsafe conditions or deviations from Technical Specifications are observed.

1.13 Personnel Monitoring

Programs currently in place for monitoring of exposures to employees will remain in effect throughout the time period during which tailings cell reclamation, mill decommissioning and clean up of windblown contamination are conducted. These programs will include personnel monitoring and the ongoing bioassay program. Access control will be maintained at the Restricted Area boundary to ensure employees and equipment are released from the site in accordance with the current License conditions. In general, no changes to the existing programs are expected and reclamation activities are not expected to increase exposure potential beyond the current levels. The Owner will assign an employee to act as RSO responsible for assuring site workers comply with the Owner's Radiation Protection Manual for Reclamation and the requirements set forth in the Owner's radioactive materials license.

1.14 Environmental Monitoring

Existing environmental monitoring programs will continue during the time period in which reclamation and decommissioning is conducted. This includes monitoring of surface and groundwater, airborne particulates, radon, soils and vegetation, according to the existing License conditions. In general, no changes to the existing programs are expected and reclamation activities are not expected to increase exposure potential beyond the current levels.

2.0 SITE CONDITIONS

2.1 Site Location

The White Mesa mill site is located about 6 miles south of Blanding, Utah in San Juan County, along County Road 191.

2.2 Climate and Geology

The climate of southeastern Utah is classified as dry to arid continental. Although varying somewhat with elevation and terrain, the climate in the vicinity of the mill can be considered as semi-arid with normal annual precipitation of about 13.3 inches. The mean annual relative humidity is about 44 percent and is normally highest in January and lowest in July. The average annual Class A pan evaporation rate is 68 inches (National Oceanic and Atmospheric Administration and U.S. Department of Commerce, 1977), with the largest evaporation rate typically occurring in July. (Denison, 2009)

The mill is located within the Blanding Basin of the Colorado Plateau physiographic province. The average elevation of the site is approximately 5,600 ft (1,707 m) above mean sea level (amsl). Typical of large portions of the Colorado Plateau province, the rocks underlying the site are relatively undeformed. The site is underlain by unconsolidated alluvium and indurated sedimentary rocks consisting primarily of sandstone and shale. The alluvial materials consist mostly of aeolian silts and fine-grained aeolian sands with a thickness varying from a few feet to as much as 25 to 30 ft (7.6 to 9.1 m) across the site. The alluvium is underlain by the Dakota Sandstone and Burro Canyon Formation, which are sandstones having total thicknesses ranging from approximately 100 to 140 ft (31 to 43 m). (Denison, 2009)

2.3 Past Operations

The mill is a uranium/vanadium mill that was developed in the late 1970's by Energy Fuels Nuclear, Inc. ("EFN") as an outlet for the many small mines located in the Colorado Plateau and for the possibility of milling Arizona strip ores. Construction on the tailings area began on August 1, 1978. The mill was operated by EFN from the initial start-up date of May 6, 1980 until

the cessation of operations in 1983 and then intermittently under different ownership through present-day. Denison (then named International Uranium (USA) Corporation), and its affiliates, purchased the assets of EFN in May 1997. Energy Fuels Resources (USA), Inc. purchased the facility in 2012 and is the current owner.

2.4 Facilities Demolition

Demolition of equipment, structures, and associated facilities at the mill site will be conducted according to applicable conditions of the radioactive materials license, the demolition plan for the facility, and the Owner's Radiation Protection Manual for Reclamation. Facilities demolition is not included in this document.

2.5 Disposed Materials

Materials to be placed in the disposal and tailings cells consists of process waste materials, structural debris, underlying liner materials, and subsoils from planned site cleanup activities. Additional detail on each material type is outlined later in the Specification. The four major types of materials are outlined below:

- Raffinate Crystals – located in Cell 1,
- Synthetic Liner – PVC liner from Cell 1,
- Contaminated Soils - soils located in and around the mill site with concentrations exceeding prescribed unity rule concentrations (see Section 6)
- Mill Debris – all equipment and structures from the demolition of the mill

2.6 Construction Materials

Construction materials for the disposal cell liner, cover system, and for erosion protection of the cover and discharge channel will include soils and aggregates from on-site and off-site sources. These materials are outlined below.

2.6.1 Liner Materials

The disposal cell will be constructed, prior to the placement of contaminated soils and mill demolition debris, with a compacted clay liner consisting of fine-grained soils. The fine-grained soils will be obtained from suitable materials stockpiled on site during cell construction.

2.6.2 Random Fill

Random fill will be used within the disposal cell and tailings cells, placed on and around mill material and debris and placed for the components of the cover system. Fill materials will be obtained from soils stockpiled on site.

2.6.3 Topsoil

Topsoil for the surface of the disposal cell and surrounding areas to be revegetated will be obtained from on-site stockpile areas.

2.6.4 Rock Mulch

A mixture of gravel and topsoil will be used in select areas on the cover. The mixture will be 25 percent gravel (with a D_{100} less than 1-inch) by weight. The sources of rock are nearby commercial sources of alluvial gravel. Rock mulch shall meet the particle-size distribution requirements outlined in Section 8.

2.6.5 Erosion Protection and Perimeter Apron Material

A layer of rock will form the erosion protection zone on the side slopes and on the perimeter apron of the disposal cell as well as within the discharge channel. The sources of rock are nearby commercial sources of alluvial gravel and cobbles. Perimeter apron material shall meet the particle-size distribution and durability requirements outlined in Section 8, and shall meet requirements for rock durability outlined in NRC (1990) and Johnson (1999, 2002).

2.6.6 Filter Materials

Filter layer materials will be obtained from an off-site local commercial source or from select on-site borrow areas.

2.6.7 Granular Materials

Granular materials will be used for filter material and may also be used for subsurface fill for the cell base. These materials will be obtained from off-site commercial sources of alluvial sand and gravel.

2.7 Staging and Stockpile Areas

Areas on site identified as staging areas or stockpile locations shall be approved by the Owner. These areas will be constructed and used in a manner consistent with the Owner's plans for storm water management. The contractor shall maintain proper erosion control measures for stockpiles and may be required to cover piles in situations where precipitation is anticipated.

2.8 Access and Security

Access to the site will be controlled at gated entrances through the existing restricted area fencing. All gated entrances and security for EFRI property will be maintained by the Owner.

2.9 Utilities

Utilities on site will be maintained by the Owner outside of work areas (areas to be demolished or reclaimed). Utilities inside of work areas will be provided and maintained by the Contractor.

2.10 Sanitation Facilities

The Contractor, in accordance with the Owner's Radiation Protection Manual for Reclamation, will maintain sanitation facilities required during construction.

3.0 WORK AREA PREPARATION

3.1 General

This Section describes the preparation of site areas for reclamation. This work will be conducted according to applicable sections of the Owner's Radiation Protection Manual for Reclamation.

3.2 Water Management

Preparation for work in the site area will include water management tasks outlined below.

- a. Removal of raffinate crystals from Cell 1.
- b. Breaching of the Cell 1 dike for construction the cell as a sedimentation basin. Re-route runoff from the mill area and areas immediately north of the cell into the sedimentation basin for discharge onto the natural ground via the channel to be located at the southwest corner of the basin.
- c. Diversion of clean area storm water runoff from work areas (where facilities demolition and material excavation will take place) and from the disposal cell footprint area.
- d. Collection of storm water runoff from within the work areas and the disposal cell footprint for treatment and permitted discharge, or for disposed material compaction or dust control. The planned storage location for this affected storm water is the sedimentation pond.
- e. Isolation of water used for processing operations associated with reclamation from storm water runoff. Water from processing operations or other contaminated water will not be used for disposal cell construction.

3.3 Cell Construction

A clay lined disposal area will be constructed adjacent to and parallel with the existing Cell 1 dike for permanent disposal of contaminated material and debris from the mill site

decommissioning and the Cell 1 Disposal Area. The area will be lined with a 12-inch thick layer of compacted clay prior to placement of contaminated materials and installation of the final reclamation cap. If there is not sufficient debris, rubble and contaminated soil to fill Cell 1 as designed, the footprint of Cell 1 can be reduced to decrease the horizontal dimension extending out from Cell 2 and the lateral extent of the disposed materials, to be closer to the base of the Cell 2 dike. If a design modification is required for Cell 1, it will be submitted to DWMRC for review and approval and these Technical Specifications will be revised accordingly.

3.4 Soil Borrow Areas

Disposal cell fill and liner materials will be excavated from among the identified borrow areas on site. Cover and liner soil will be from suitable materials stockpiled on site during cell construction.

Specific soil borrow areas will be selected based on haul distance to the disposal cell, ease of excavation of cover material, geotechnical characteristics, uniformity of the borrow material, and acceptable radiological and geochemical characteristics.

Borrow area preparation will consist of setup for storm water management (Section 3.2) and clearing and stripping (Section 3.5).

3.5 Clearing and Stripping

For work areas that are vegetated, preparation work will include tasks outlined below.

3.5.1 Clearing

Clearing of vegetation and grubbing of roots will be in identified work areas. Clearing and grubbing shall not extend beyond 20 feet from the edge of the work area, unless as shown on the Drawings or as approved by the Reclamation Project Manager.

Vegetation from clearing and grubbing may be shredded or chipped to form mulch. Alternative methods of on-site or off-site disposal or burning of stripped vegetation shall be conducted only as approved by the Reclamation Project Manager.

3.5.2 Stripping

Stripping of salvageable topsoil (if present) shall be done within the entire work area. Stripping of topsoil shall not extend beyond 10 feet from the edge of the work area, unless approved by the Reclamation Project Manager. The depth of stripping of reclamation soil shall be based on the presence of suitable topsoil and approved by the Reclamation Project Manager. Water shall be added to the area of excavation if the soils are dry and stripping work is generating dust.

Topsoil shall be stockpiled in approved stockpile areas. The final stockpile surface shall be graded and smoothed to minimize erosion and facilitate interim revegetation of the stockpile surfaces.

4.0 CELL 1 DISPOSAL AREA BASE CONSTRUCTION

4.1 General

This section outlines work associated with construction of the disposal cell base for receipt of materials (as described in Section 7.0) within Cell 1. The base of the disposal cell will be lined with a compacted clay liner. The cell base will be constructed as shown on the Drawings and outlined in these Technical Specifications.

4.2 Materials Description

4.2.1 Subgrade Fill

The disposal cell footprint is likely to have an irregular surface from areas that have been excavated. Low areas of the excavated surface should be filled to form a smooth, competent foundation for clay liner construction. Subgrade fill will be used in excavated areas of the disposal cell footprint to meet desired grades and elevations for the disposal cell foundation (shown on the Drawings).

Subgrade fill may consist of off-site granular materials, or soils and weathered sedimentary rock from approved on-site excavation areas. Subgrade fill shall be minus 6-inch size, and shall be free from roots, branches, rubbish, and process area debris.

4.2.2 Clay Liner Material

Clay liner material shall be minus 1-inch size, and shall be free from roots, branches, rubbish, and process area debris. Clay liner material shall have a minimum of 40 percent passing the No. 200 sieve and a minimum plasticity index (PI) of 15 percent. Suitable materials will classify as CL, CH, or SC materials under the Unified Soil Classification System.

4.3 Work Description

4.3.1 Foundation Preparation

The footprint of the disposal cell shall form a competent foundation for clay liner and cover construction. The surface of the disposal cell footprint shall be filled (where required) in low areas to form a smooth, competent foundation for clay liner and cover construction. Subgrade fill (Section 4.2.1) shall be placed in lifts and compacted in excavated areas of the disposal cell footprint to meet desired grades and elevations for the disposal cell foundation (shown on the Drawings). The final filled surface shall be compacted with approved construction equipment to provide a foundation surface with uniform density for clay liner placement.

4.3.2 Disposal Cell Foundation Area

The footprint of the disposal cell is established along the north side of the tailings dike along the south edge of Cell 1 (shown on the Drawings).

4.3.3 Subgrade Fill Placement

Subgrade fill (Section 4.2.1) shall be placed in lifts and compacted in excavated areas of the disposal cell footprint to meet desired grades and elevations for the disposal cell foundation. Subgrade fill may be (1) granular material from off-site commercial sources, or (2) soils and weathered sedimentary rock from approved on-site excavation areas.

4.3.4 Clay Liner Material Placement

Clay liner material (Section 4.2.2) shall be placed in lifts with a maximum compacted thickness of 6 inches to form a continuous layer with a total minimum compacted layer thickness of 12 inches. Clay liner material shall be placed over the prepared subgrade surface of the disposal cell (Section 4.3.1).

Compaction of the clay liner material shall be done with a sheepsfoot or tamping-foot roller of sufficient weight to achieve the required compaction specifications. Rubber-tired equipment shall not be used solely to compact the clay liner material.

If the moisture content of any layer of clay liner is outside of the allowable placement moisture content range specified, the material shall be moistened and/or reworked with a harrow, scarifier, or other suitable equipment to a sufficient depth to provide relatively uniform moisture content and a satisfactory bonding surface before the next layer of clay material is placed. If the compacted surface of any layer of clay liner material is too wet (due to precipitation) for proper compaction of the fill material to be placed thereon, it will be reworked with a harrow, scarifier or other suitable equipment to dry out the layer and reduce the moisture content to within the required limits. The layer would then be re-compacted.

The layers of the placed clay liner will be such that the liner will, as far as practicable, be free of lenses, pockets, streaks or layers of material differing substantially in texture, gradation or moisture content from the surrounding material. Oversized material will be controlled through selective excavation of stockpiled material, observation of placement by a qualified individual with authority to stop work and reject material being placed and by culling oversized material from the fill.

No clay liner material will be placed when either the materials, or the underlying material, is frozen or when ambient temperatures do not permit the placement or compaction of the materials to the specified density without developing frost lenses in the fill.

Any holes in the clay liner material resulting from testing should be repaired by hand by filling with clay fill, or by filling with bentonite powder which is hydrated to fully seal the hole.

4.4 Performance Standards and Testing

Test results indicating dry densities less than the specified values will be rejected. Such rejected material shall be reworked by the contractor as necessary and rerolled until a dry density equal to or greater than the specified percent of standard Proctor maximum density is attained. Material that is too dry or too wet to permit bonding of layers during compaction will be rejected and shall be reworked by the contractor until the moisture content is within the specified limits. Reworking may include removal, re-harrowing, reconditioning, rerolling, or combinations of these procedures.

4.4.1 Subgrade Testing

Where required, checking of compaction of compacted subgrade fill and the final subgrade surface shall consist of a minimum of one field density test per 1,000 cubic yards of material compacted. A minimum of two tests will be taken for each day that an applicable amount of fill is placed in excess of 150 cubic yards. A minimum of one test per lift and at least one test for every full shift of compaction operations will be taken.

Field density tests shall be compared with standard Proctor tests (ASTM D698 Method A or C). Where required, standard Proctor or Maximum Index Density tests shall be conducted at a frequency of at least one test per 5,000 cubic yards of material compacted, or when material characteristics show significant variation.

Field density testing may be conducted with the sand cone test (ASTM D1556) or a nuclear density gauge (ASTM D6938, or as modified by the QA Manager). Correlation of nuclear density gauge results shall be by comparison with results from sand cone test(s) and laboratory testing for water content(s) using the oven drying method (ASTM D2216) on similar material.

Subgrade fill will be placed in lifts not exceeding 8 inches in loose thickness. Each lift shall be compacted to a minimum of 90 percent of standard Proctor (ASTM D698) density and within three percent of the optimum moisture content for the material.

4.4.2 Clay Liner Testing

Material specifications for the clay liner material shall be confirmed by gradation testing conducted by approved personnel. Testing shall consist of No. 200 sieve wash and maximum particle size testing (ASTM D422), and Atterberg limits testing (ASTM D4318) on samples of clay liner materials, at a frequency of at least one test per 2,500 cubic yards of fill placed, or when material characteristics show a significant variation.

Checking of compaction of the clay liner material shall consist of a minimum of one field density test per 500 cubic yards of material compacted. A minimum of two tests will be taken for each

day that an applicable amount of fill is placed in excess of 150 cubic yards. A minimum of one test per lift and at least one test for every full shift of compaction operations will be taken.

Field density tests shall be compared with standard Proctor tests (ASTM D698 Method A or C) on the same material. Standard Proctor tests shall be conducted at a frequency of at least one test per 2,500 cubic yards of material compacted, or when material characteristics show significant variation.

Field density testing may be conducted with the sand cone test (ASTM D1556) or a nuclear density gauge (ASTM D6938, or as modified by the QA Manager). Correlation of nuclear density gauge results shall be by comparison with results from sand cone test(s) and laboratory testing for water content(s) using the oven drying method (ASTM D2216) on similar material.

Each lift of clay liner material shall be compacted to at least 95 percent of the maximum dry density for the material, as determined by the standard Proctor test (ASTM D698). During compaction, the material shall be within 2 percent above to 2 percent below optimum moisture content for the material, as determined by the standard Proctor test. If water addition is required to achieve this range of moisture contents, the added water shall be thoroughly mixed into the material prior to compaction.

4.4.3 Grading Tolerances

The completed grading for the clay liner shall be within 1.0 foot (horizontally) of the lines as designed, and within 0.1 foot (vertically) of the elevations as designed. The final surfaces shall be smoothed to avoid abrupt changes in surface grade or areas of runoff concentration. The layer thicknesses shall meet the required minimum thicknesses.

5.0 DISCHARGE CHANNEL GRADING

5.1 General

This section outlines specifications for the work associated with excavating the discharge channel into competent bedrock. Portions of the grading for the sedimentation basin may be in soil, while other areas may require rock excavation. In general, the rock is believed to be rippable, however the Contractor should account for the possibility that harder rock may be encountered in the excavation areas.

5.2 Work Description

5.2.1 Discharge Channel Excavation

The discharge channel shall be excavated to the slopes and grades shown on the Drawings. The channel width(s) shall be constructed to the dimensions shown on the Drawings. The side slopes of the channel shall be 3:1 (horizontal to vertical).

Discharge channel excavation will include breaching of the Cell 1 dike on the east side. Riprap will not be required to armor the discharge channel when the channel excavation is into competent sedimentary rock. The competency of the sedimentary rock must be verified in the field by the CQA Manager.

5.2.2 Grading Tolerances

Completed grading for the sedimentation basin, in soil, shall be within 1.0 foot (horizontally) of the lines as designed, and within 0.1 foot (vertically) of the elevations as designed. Final surfaces shall be smoothed to avoid abrupt changes in surface grade or areas of runoff concentration.

The completed grading for the discharge channel (and portions of the sedimentation basin) in rock shall be within 2.0 foot (horizontally) of the lines as designed, and within 0.5 foot (vertically) of the elevations as designed. The final rock surfaces will be rough and should not be filled to make grade. The bedrock channel should be constructed at or below the design grades in order to meet the intent of the design.

6.0 MILL DECOMMISSIONING

The following subsections describe decommissioning plans for the mill buildings and equipment, the mill site, and associated windblown contamination.

6.1 Mill Buildings and Equipment

The uranium and vanadium processing areas of the Mill, including all equipment, structures and support facilities, will be decommissioned by demolition and disposed of in tailings or buried on site as appropriate. All equipment, including tankage and piping, agitation equipment, process control instrumentation and switchgear, and contaminated structures will be cut up, removed and buried in tailings prior to final cover placement. Concrete structures and foundations will be broken up and removed. Concrete foundations may be left in place and covered with soil as appropriate.

Decommissioned areas will include, but not be limited to the following:

- Coarse ore bin and associated equipment, conveyors and structures
- Grind circuit including semi-autogeneous grind (SAG) mill, screens, pumps and cyclones
- Three pulp storage leach tanks to the east of the mill building, including all tankage, agitation equipment, pumps and piping
- Seven leach tanks inside the main mill building, including all agitation equipment, pumps and piping
- The counter-current decantation (CCD) circuit including all thickeners and equipment, pumps and piping
- Uranium precipitation circuit, including all thickeners, pumps and piping
- Two yellow cake dryers and all mechanical and electrical support equipment, including uranium packaging equipment

- Clarifiers to the west of the mill building including the preleach thickener (PLT)
- The boiler and all ancillary equipment and buildings
- The entire vanadium precipitation, drying and fusion circuit
- All external tankage not included in the previous list including reagent tanks for the storage of acid, ammonia, kerosene, water, dry chemicals, etc. and the vanadium oxidation circuit
- The uranium and vanadium solvent extraction (SX) circuit including all SX and reagent tankage, mixers and settlers, pumps and piping
- The SX building
- The mill building
- The alternate feed processing circuit
- The decontamination pads
- The office building
- The shop and warehouse building
- The sample plant building
- The reagent storage building

The sequence of demolition will proceed so as to allow the maximum use of support areas of the facility such as the office and shop areas. It is anticipated that all major structures and large equipment will be demolished using hydraulic shears. This equipment will expedite the process, provide proper sizing of the materials for transport and placement, and reduce exposure to radiation and other safety hazards during the demolition. Any uncontaminated or

decontaminated equipment to be considered for salvage and remediation equipment will be released in accordance with the terms of License Condition 9.10 and NUREG 1575 Supplement 1, Multi-Agency Radiation Survey and Assessment of Materials and Equipment Manual (MARSAME) (NRC, 2009) as appropriate and applicable. Contaminated soils from the mill area will be disposed of in the tailings cells in accordance with Section 7.0 of the Technical Specifications.

6.2 Mill Site and Windblown Contamination

Areas with contamination around the mill site are expected to be primarily surficial and include the ore storage area and surface contamination of some roads. All ore and alternate feed materials will have been previously removed from the ore stockpile area. All contaminated materials will be excavated and be disposed in one of the tailings cells in accordance with Section 7.0 of these Technical Specifications. The depth of excavation will vary depending on the extent of contamination and will be based on the criteria in Section 7.2.3 of these Technical Specifications. All other 11e.(2) byproduct materials will be disposed of in the tailings cells.

As discussed in Section 6.1, as well as above, EFRI proposes to reclaim the mill and surrounding land areas within the property boundary by excavating and placing wastes, demolition debris and contaminated soils into a fenced and controlled permanent tailings disposal area. The permanent tailings disposal area, the current restricted area, and the property boundary, are delineated in Figure REC-1. EFRI proposes to survey and release all areas within the property boundary, excluding the proposed tailings disposal area, for unrestricted use. Contaminants of concern are Ra-226, Th-230 and natural uranium (U-nat). The evaluation and remediation will be by Ra-226, which is the contaminant with the most restrictive cleanup standard based on the SENES Consultants, Inc. letter to EFRI dated August 15, 2012. This letter was provided as Attachment I to EFRI's Supporting Documentation for Response to Utah DWMRC Interrogatory 13/1 (SENES 2012). The relationship between Ra-226 and the remaining two contaminants will be developed as discussed in subsequent sections of this Specification. Verification of the remediation will be established through a Wilcoxon Rank Sum (WRS) test between the study areas and local background areas. The procedure for verification will follow guidance from NUREG 1575 Multi-

Agency Radiation Survey and Site Investigation Manual (MARSSIM) (NRC, 2000). The procedure will include:

- Scoping and characterization surveys: soil samples will be collected to develop a correlation between gamma radiation levels and the unity rule.
- Classification of land areas: to (MARSSIM) Class 1 through Class 3.
- Remediation of land areas driven by correlation-based prediction equation between gamma radiation and the unity rule for multiple radionuclides.
- Final Status Survey using the Wilcoxon Rank Sum (WRS) test with local background areas.

The procedure also follows the Data Quality Objective (DQO) process defined in the MARSSIM Guidance, as discussed in Section 6.6, below and NUREG-1757 Volume 2 Consolidated Decommissioning Guidance, Characterization, Survey, and Determination of Radiological Criteria (NRC, 2006).

6.3 Scoping and Characterization Surveys

Areas contaminated through process activities or windblown contamination from the tailings areas will be remediated to meet applicable cleanup criteria for Ra-226, Th-230, and U-nat. Contaminated areas will be remediated such that the residual radionuclides remaining on the site, which are distinguishable from background, will not result in a dose that is greater than that which would result from the Ra-226 soil standard, that is, 5 pCi/g above background for the surface 15 cm soil layer and 15 pCi/g for the subsurface 15 cm soil layer, respectively as discussed in Section 6.6.3.3 and hereafter referred to as “5/15”.

An initial scoping survey for windblown contamination will be conducted based on analysis of pertinent past radiometric and land use information. Operational surveys of the areas surrounding the mill and tailings area have indicated potential windblown contamination only to the north and east of the ore storage area, and to the southwest of Cell 3. The initial scoping survey will be conducted using calibrated gamma radiation instruments on 15 meter (15 m) transects. Additional surveys will be conducted in a halo, or buffer zone, around the projected impact area.

The survey in the halo will be conducted using 25 m transects. Areas where no readings exceed 75 percent of the gamma radiation guideline value, as developed per Section 6.3.2, will be classified as unaffected, and will not require remediation. Areas where one or more readings exceed the gamma radiation guideline value will be further investigated to determine whether or not remediation is required.

Prior to initiating cleanup of windblown contamination, a statistically-based soil sampling program will be conducted in an area within or outside the property boundary that is similar to the areas to be remediated, to determine the average background Ra-226 concentration, or concentrations, to be ultimately used for the cleanup. Similarity, or representativeness, will be determined based on geology, soil type and soil chemistry.

Soil cleanup verification will be accomplished by use of calibrated gamma radiation instruments. Multiple instruments will be maintained and calibrated to ensure availability and consistency during remediation efforts (Section 6.3.4).

6.3.1 Scoping and Characterization Survey for the Subsurface

The subsurface will only be investigated in areas where the historical site assessment (HSA) demonstrates the possibility of contamination below the surface 15 cm. This does not include areas of windblown contamination, or the ore storage area (unless also affected by an event demonstrated by the HSA). The method for the subsurface investigation will include boreholes where soil sampling and downhole gamma radiation investigations may occur. This method will be developed based on the HSA.

6.3.2 Gamma Radiation to Unity Rule Correlation

EFRI plans to use radiation measurement instrumentation for soil background analyses, unity rule – gamma radiation correlations, verification data, and sensitivity analyses. Soil background analyses will be completed using MARSSIM methodology for background reference areas.

Soil samples taken during characterization for correlation will be analyzed by a certified laboratory to determine the on-site correlation between the gamma radiation readings and the concentration of Ra-226, Th-230 and U-nat, in the samples. Samples will be taken from:

- Areas known to be contaminated with only processed uranium materials (i.e. tailings sand and windblown contamination)
- Areas in which it is suspected that unprocessed uranium materials (i.e. ore pad and windblown areas downwind of the ore pad) are present

The actual number of samples used will depend on the correlation of the results between gamma radiation readings and the unity rule as discussed below. Windblown contamination to the northeast of the mill area is primarily associated with the unprocessed ore from the ore storage pad. The slightly larger windblown contamination area to the southwest of the mill area is primarily associated with the processed tailings. A minimum of 35 samples of windblown tailings (to the southwest), and 15 samples of windblown unprocessed ore materials (to the northeast) will be collected.

Sufficient samples will be taken to ensure that prediction equations can be developed to adequately calculate the linear regression lines and the corresponding upper and lower 95 percent confidence levels for each of the instruments. The upper one-sided 95 percent confidence limit will be used for the guideline value for correlation between gamma radiation readings and Ra-226 concentration. Because the unprocessed materials are expected to have proportionally higher values of uranium in relation to the Ra-226 and Th-230 content, the correlation to the gamma radiation readings are expected to be slightly different than readings from areas known to be contaminated with only processed materials. Areas expected to have contamination from both processed and unprocessed materials will be evaluated on the more conservative correlation, or will be excavated to the Ra-226 standard which should ensure that the uranium is removed.

The samples will be judgmentally selected with Ra-226 concentration at three different intervals:

- Twenty-five percent of the guideline value (5 pCi/g above background)

- Approximately the guideline level (5 pCi/g)
- Approximately twice the guideline level for the area of interest

This selection will maximise the precision of the correlation relationship at 5.0 pCi/g above background. Background Ra-226 concentrations have been gathered over a 16-year period at sample station BHV-3 located upwind and 5 miles west of the mill. The Ra-226 background concentration from this sampling location is 0.93 pCi/g. This value and the concentrations of U-nat and Th-230 assumed in equilibrium with the Ra-226 will be used as an interim value for the background concentration used only in the initial planning for this project (e.g. use of historical knowledge for preliminary setting of verification sample sizes). Background locations for the verification test will have the three contaminants measured at multiple locations.

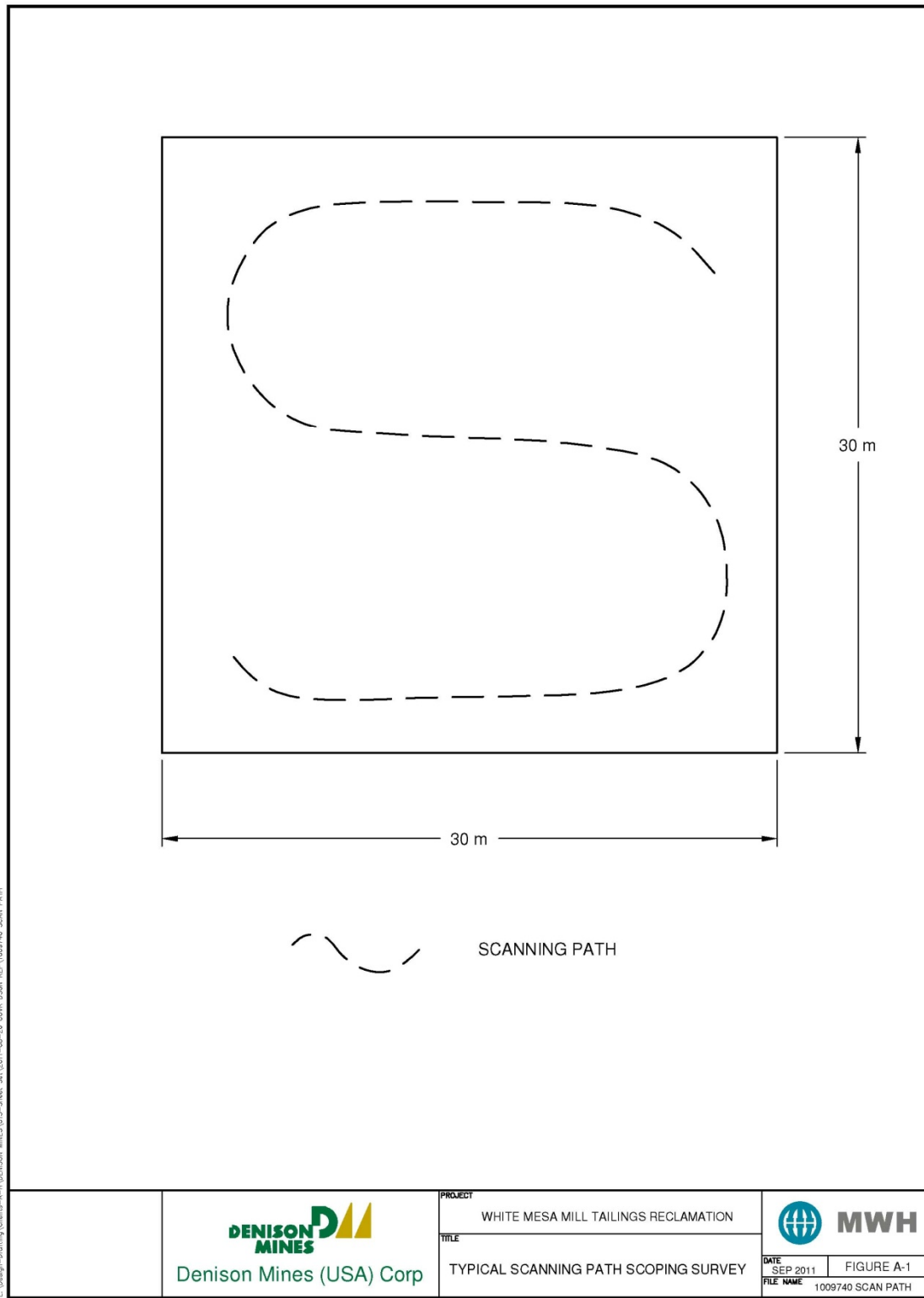
Because Ra-226 has short-lived radioactive decay products that are strong gamma radiation emitters (namely Pb-214 and Bi-214), gamma radiation surveys can be effective for characterizing soil Ra-226 distributions across large areas, including on relatively small spatial scales. The well-established, effective, and widely-used analytical approach for spatially comprehensive characterization of Ra-226 concentrations in surface soils involves spatially intensive gamma radiation surveys combined with the use of gamma radiation and soil Ra-226 concentration correlations.

If a gamma radiation and Ra-226 concentration correlation is statistically significant, Ra-226 concentrations in surface soils can be predicted with reasonable accuracy based on gamma radiation readings collected at a high density of measurements across large areas. The same is true for other radionuclides, though correlative relationships tend to be less statistically significant and estimation uncertainty can be higher. The advantage of gamma radiation surveys is that a much higher density of measurements of terrestrial sources of gamma radiation is possible and when combined with gamma radiation/soil radionuclide correlation analysis, the approach produces a more comprehensive spatial characterization for comparisons against baseline conditions and evaluation of potential radiological contamination.

Fifteen soil samples will be collected in the restricted area to establish a correlation between the soil sampling analysis and the gamma radiation count. Additional measurement locations will be added, if necessary, to reach suitable precision, as defined in Section 6.6.3.7. The method that will be used in an effort to develop statistically significant gamma radiation/soil radionuclide correlations is as follows:

1. At each correlation plot, a 100 m² (10 m x 10 m) plot for correlation measurements and soil sampling will be established with pin flags. A gamma radiation scan will be performed across each correlation plot (5 m transects at a detector height of 18 inches). The average gamma radiation reading (e.g. cpm) from scan data across each correlation plot will be calculated and recorded in the field logbook, or developed using data collected from the gamma radiation scan. See Figure A-1 for the scan path.
2. Within each 10 m x 10 m, correlation plot nine sub samples of surface soils, one in the center, and eight against the edges of the plot, will be collected across the plot (at a depth of 15 cm) and composited into a single sample to represent average soil radionuclide characteristics across the correlation plot. Composite surface soil samples from each correlation plot will be submitted to a qualified commercial laboratory for analysis of U-nat, Ra-226, Th-230, Th-232 (by Ra-228), and K-40. The correlation plot scanning and sampling design for each location is illustrated in Figure A-1.
3. The laboratory chain of custody/analysis request form to be submitted with composite correlation plot soil samples will specify the following requirements:
 - a. Thorough homogenization of each sample at the laboratory.
 - b. Ra-226 analysis by EPA Method 901.1, modified for soil samples, with sample counting to be performed at least 21 days after sealing in the counting tin to ensure full ingrowth of Rn-222 and its decay products. Analysis of K-40 will also be conducted with EPA method 901.1, as will analysis of Ra-228 (to determine Th-232 concentrations under the assumption of radiological equilibrium).

- c. U-nat analysis by EPA Method 200.8 (ICP-MS) or equivalent, preferably with soil matrix digestion using EPA Method 3052 (microwave assisted acid digestion). EPA Method 3050B or equivalent digestive methods may alternatively be used, however digestion will not be as complete.
 - d. Th-230 analysis by EPA Method 200.8 (ICP-MS) or equivalent, preferably with soil matrix digestion using EPA Method 3052 (microwave assisted acid digestion). Ten percent of the correlation plot samples will also be analyzed for Th-230 by alpha spectroscopy.
4. Upon receiving soil analysis results from the laboratory, regression analysis will be performed to determine, based on paired data from all correlation plots, if significant statistical correlations exists between average gamma radiation readings and soil Ra-226, U-nat, Th-230, Th-232 by Ra-228 and K-40 concentrations.



6.3.3 Area Classification

The characterization and scoping surveys will be used to classify areas as either non-impacted or impacted areas. The impacted areas will be further classified into Classes 1-3 (NUREG 1575). The classification of the areas will determine the rigor required to survey and release the areas.

- Class 1 areas are areas which have, or had prior to remediation, a potential for radioactive contamination based on mill operating history, or known contamination based on previous radiological surveys. Areas containing contamination in excess of the release criterion, specifically the Derived Concentration Guideline Level (DCGL) associated with the Wilcoxon Rank Sum Test (DCGL_w), established by the radium benchmark dose (RBD) approach in Section 6.6.3.3 prior to remediation should be classified as Class 1 areas. The concentration terms “DCGL_w”, “release criterion”, and “unity rule”, have been used interchangeably throughout the remainder of this Specification. However, where a gamma radiation-based level is meant, the term “gamma guideline level” is used specifically.
- Class 2 areas are areas which have, or had prior to remediation, a potential for radioactive contamination or known radioactive contamination, but are not expected to exceed the DCGL_w.
- Class 3 areas are any impacted areas not expected to contain any residual radioactivity, or are expected to contain levels of residual radioactivity at a small fraction of the DCGL_w, based on mill operating history and previous radiological surveys

Table 6.1 - Final Status Survey Unit Classification for Land Areas

Survey Unit Classification		Statistical Test	Elevated Measurement Comparison	Sampling and/or Direct Measurements	Suggested Area (m ²)	Scanning
Impacted	Class 1	Yes	Yes	Systematic	2000	100% Coverage
	Class 2	Yes	Yes	Systematic	10,000	10-100% Systematic
	Class 3	Yes	Yes	Random	No limit	Judgmental
Non-Impacted		No	No	No	None	None

6.3.4 Remediation

Remediation will only occur in survey units that cannot pass the release criterion (DCGL_w). Remediation will consist of excavation of soils and placement in the tailing cells, as stated in Section 7.2.3, below. Remedial action support surveys will be conducted to guide the remediation. Remedial action support surveys will be conducted in a manner similar to the Final Status Surveys (FSSs), described in Sections 6.4 and 6.6, to ensure that the remedial action achieves the DCGL_w. Excavation will continue until the gamma radiation guideline value is achieved for surface soils

Upon completion of remediation, gamma radiation surveys will be conducted on the excavated area and areas surrounding the excavation.

6.4 Final Status Surveys

Areas of the site will be released through the final status survey (FSS) process (see Section 6.6). Survey units will be released through FSS reports provided to DWMRC for each survey unit. Survey units that require remediation will undergo the FSS process after remediation. Survey units must meet the release criterion set forth in this section. Each survey unit that meets the release criterion will be released, pending DWMRC approval.

6.4.1 Release Criterion

Release criteria have been established and are discussed in more detail in Section 6.6.

6.4.2 Statistical Test

The WRS test will be performed using the background reference data set and the systematic sample data set from the survey unit under investigation. The background reference data set will be added to the unity rule (1) prior to the statistical test being completed. The two data sets will be derived using the weighted sum for multiple radionuclides set forth in MARSSIM:

For surface soils:

$$\frac{A \text{ (pCi/g Ra226)}}{5 \text{ (pCi/g)}} + \frac{B \text{ (pCi/g Unat)}}{545 \text{ (pCi/g)}} + \frac{C \text{ (pCi/g Th230)}}{46 \text{ (pCi/g)}} + 1$$

For subsurface soils:

$$\frac{A \text{ (pCi/g Ra226)}}{15 \text{ (pCi/g)}} + \frac{B \text{ (pCi/g Unat)}}{2908 \text{ (pCi/g)}} + \frac{C \text{ (pCi/g Th230)}}{142 \text{ (pCi/g)}} + 1$$

For instance, if the background reference area surface soil data set showed that one sample contained 2.2 pCi/g Ra-226, 2.2 pCi/g U-nat, and 2.0 pCi/g Th-230, the sample would be represented in the WRS data set as the following:

$$\frac{2.2 \text{ (pCi/g Ra226)}}{5 \text{ (pCi/g)}} + \frac{2.2 \text{ (pCi/g Unat)}}{545 \text{ (pCi/g)}} + \frac{2.0 \text{ (pCi/g Th230)}}{46 \text{ (pCi/g)}} + 1 = 1.49$$

Thus, 1.49 (unitless) for this particular background sample would be used in the WRS comparison data set for the background reference area to be compared to the survey unit data. If this sample were from the survey unit, the value would be 0.49 (unitless).

The WRS test will be performed on the survey unit and background reference area using the method in MARSSIM. For Class 1 to Class 3 survey units, the null hypothesis is that the survey unit exceeds the release criterion. If the null hypothesis is rejected, the mean for the survey unit does not exceed the DCGL_W, and no area exceeds the DCGL Elevated Measurement Comparison (DCGL_{EMC}) then the survey unit is presumed to meet the release criterion and, pending DWMRC approval, released.

If an area in a survey unit exceeds the $DCGL_W$, the area of the contamination will be determined using a mixture of soil sampling and gamma radiation surveying.

A comparison will be made to the EMC will be made to determine if the area presents a dose equal to, or lower than, the $DCGL_W$ scenario. This determination will be completed through the derivation of area factors based on the size of hypothetical areas of contamination. The area factor for a contaminated area will be multiplied by the $DCGL_W$ to determine the allowable contaminant concentration for that size of area, which still meets the unity rule. Area factors will be determined prior to FSS's and will be approved by DWMRC.

Areas of elevated activity that do not meet the $DCGL_{EMC}$ will be remediated.

6.5 Instrument Quality Assurance/Quality Control (QA/QC)

Field gamma radiation survey instrumentation will be sodium iodide (NaI) detectors. To the extent possible, the same instruments will be use throughout the characterization, remediation and final status survey. These instruments will be cross calibrated to allow other identical instruments or similar instruments to be used. Individuals will be appropriately trained to use the selected instrumentation and the instrumentation will be suitable for its intended use. Instrumentation shall be operated in accordance with written procedures and manufacturer's manuals which will provide guidance to field personnel on the proper use and limitations of the instruments.

6.5.1 Calibration

The manufacturer's current calibration/maintenance records will be kept on site for review and inspection for all instruments used during the survey. Past calibration records will be retained for inclusion in the FSS report.

The records will include, at a minimum, the following:

- Equipment identification (name, model, and serial number)
- Manufacturer
- Date of calibration

- Calibration due date

Instrumentation must be maintained and calibrated to manufacturer's specifications to ensure that required traceability, sensitivity, accuracy, and precision of the equipment/instruments are maintained. Instruments will be maintained and calibrated in accordance with American National Standards Institute N323A (ANSI, 1997).

6.5.2 Source and Background Checks

Prior to and after daily use, instruments will be QC-checked by comparing the instrument's response to a designated gamma radiation source and to ambient background. Prior to commencement of field operations, a site reference location will be selected for the performance of these checks. Acceptable ranges (count rate) for each instrument will be established by performing a series of counts. The acceptable range will be ± 2 sigma of the mean of the series of counts. QC source checks will consist of one-minute integrated counts with the designated source position in a reproducible geometry, performed at the designated location. Background checks will be performed in an identical fashion with the source removed. Results of the background and QC checks will be recorded in a field logbook.

Instrument response to the designated QC check source will be plotted on control charts or in tabular form (spreadsheets) and evaluated against the average source and background readings established at the start of the field activities. A performance criterion of ± 2 sigma of this average will be used as an investigation action level, and a repeat of the measurement will be performed. A performance criterion of ± 3 sigma of this average will be used as a failure level requiring corrective action. Results exceeding this criterion will be investigated and appropriate corrections to instrument readings will be made if the response is affected by factors beyond personnel control, such as large humidity or temperature changes. The instrument(s) in question will be removed from service while investigations and corrective actions are in progress.

Instrument response to ambient background will be used to establish a mean background response for each instrument, to monitor gross fluctuations in background activity (e.g., from changes in barometric pressure and other, non-contaminant related causes), and to evaluate

detector response. The background measurements are performed for the purpose of checking for detector contamination and electronic stability (especially cabling).

Instrument response to source checks are used to prove detector efficiency and electronics stability.

During QC checks, instruments shall be inspected for physical damage, current calibration and erroneous readings. The individual performing these tasks shall document the results in accordance with the instrument protocol within MARSSIM, as provided in Exhibit A-1. Instrumentation that does not meet the specified requirements of calibration, inspection, or response check will be removed from operation. If the instrument fails the QC response check, any data obtained to that point, but after the last successful QC check will be considered invalid due to potentially faulty instrumentation.

6.6 Data Quality Objectives

This plan was developed using guidance from MARSSIM was developed to ensure surveys are conducted with the proper rigor, quality assurance, and statistical analysis to make proper decisions. A key step in the MARSSIM process is the development of DQOs. DQOs ensure collection of data of the right type, quality, and quantity to support decisions, the decommissioning process, and the achievement of the desired end state. The DQOs are outlined below, and include systematic processes to:

- 1) State the problem
- 2) Identify the goal of the characterization
- 3) Identify inputs to the decision
- 4) Define the study boundaries
- 5) Develop the decision rules/analytical approach
- 6) Define acceptable decision errors

7) Optimize the design

6.6.1 State the Problem

Ultimately, the mill will be decommissioned, the demolition and decommissioning waste disposed in the tailings cells, and the tailings system reclaimed as approved by Utah DWMRC. The reclamation objective is to release the mill's land areas other than the tailings area, for unrestricted use. Land areas may have radiological contamination from milling operations. The scanning procedure needs to identify and distinguish areas that can be released, from areas that must be remediated prior to being released. The data collected following excavation in remediation areas must also be suitable for use in the final status survey (FSS) to demonstrate that the clean-up criteria have been met.

6.6.2 Identify the Decisions

The decision process will be based on data from scoping and characterization surveys, gamma radiation correlation, remediation and final status surveys.

Survey and sampling data will be used to:

- 1) Assist in classification of survey units
- 2) Determine areas requiring remediation
- 3) Develop Final Status Surveys to verify that clean-up criterion has been met

6.6.3 Identify Inputs to the Decision

6.6.3.1 Characterization and Scoping

HSAs, scoping surveys, and characterization surveys will be used to determine the extent of the contamination as well as the presence of useable relationships/ratios between the radionuclides of background reference areas. The presence of useable relationships will be established in accordance with Section 4.5 of MARSSIM. Soil sampling will be conducted in the survey areas and samples will be analyzed for U-nat, Th-230 and Ra-226.

The background must be correctly characterized and a proper background reference area chosen to represent the background for the mill soils. This will ensure that the soil will be cleaned up to the appropriate level. Goals of the characterization include selecting an appropriate background reference area(s) and appropriate background(s), and correctly comparing selected background(s) with the survey units. Multiple backgrounds may be selected for different survey units depending on the characterization and scoping surveys in conjunction with the HSA.

From MARSSIM Section 4.5, a site background reference area should have similar physical, chemical, geological, radiological, and biological characteristics as the survey unit being evaluated. Background reference areas are normally selected from non-impacted areas, but are not limited to natural areas undisturbed by human activities. In some situations, a reference area may be associated with the survey unit being evaluated, but cannot be potentially contaminated by site activities. For example, background measurements may be taken from core samples of a building or structure surface, pavement, or asphalt. The selected reference areas will be reviewed with Utah DWMRC.

Systematic soil sampling will occur prior to the FSS, and samples will be analyzed for Ra-226, Th-230, and U-nat to determine background concentrations to be used for the cleanup. The soil sampling to determine the average background radionuclide concentrations to ultimately be used for the cleanup will be conducted prior to remediation. Background sampling will be conducted in a reference area within or outside of the property boundary that is similar to the area to be remediated.

Background reference areas will be chosen such that they are representative of the survey unit locations but are non-impacted from site operations. Representativeness shall be determined on the basis of geomorphology, geological, geochemical, and radiological, considerations.

6.6.3.2 Correlation

A correlation of the unity rule in the soil to the gamma radiation will be developed. This correlation will guide remediation and excavation. This correlation is explained in Section 6.3.2.

Remediation of the soil to meet the unity rule is described in Section 6.3.4. The final status survey reports will be the definitive source of information to describe the final impacts on the soil left by the mill. The reports will detail how the cleanup met the Site Cleanup Criteria and show that each survey unit meets the cleanup criteria. The FSS reports will verify that the remediation has achieved the cleanup criteria.

6.6.3.3 Site Cleanup Criteria

The DCGLs for Ra-226 are set at 5 pCi/g for the surface 15 cm soil layer and 15 pCi/g for the subsurface 15 cm soil layer, respectively (hereafter referred to as “5/15”) (See Attachment I for further discussion).

The DCGLs for radionuclides other than Ra-226 are derived from doses calculated for Ra-226 at 5/15 using the same exposure scenarios as were used to estimate the dose from Ra-226 at 5/15. This is referred to as the radium benchmark dose (RBD).

Generally, elevation of U-nat and Th-230 concentrations relative to Ra-226 is unexpected since the contaminated materials will either be ore (which are at or near secular equilibrium) or tailings where U-nat is reduced relative to the other uranium decay series radionuclides of interest. Possible exceptions are:

- Areas with raffinate crystals which may have higher Th-230 concentrations compared to Ra-226 concentrations
- Areas of spilled yellowcake product near the mill where U-nat may be elevated relative to Ra-226

The RBD approach was applied as described in Attachment I Supporting Documentation for Interrogatory 13/1: The Radium Benchmark Dose Approach. The RESRAD (Version 6.5) code (Yu et al. 2001) was used to implement the RBD approach. As described in NUREG-1569 as Appendix E (NRC 2003, a Guidance document for NRC Commission Staff on the Radium Benchmark Dose Approach), NRC considers the RESRAD code as an acceptable code for application of the Ra-226 benchmark dose approach. In brief, radionuclides at their respective DCGLs result in the same benchmark dose as the Ra-226 DCGL.

The DCGLs for the radionuclides of interest for the surface and subsurface layers were calculated and are provided in Table 6.2. The scenario is for a rancher with the doses determined using the RESRAD Version 6.5 model. The default RESRAD dietary and inhalation data which apply for the adult are carefully selected from literature and are already considered to represent conservative parameter values. Details on the calculation of DCGL's are provided in Attachment I.

Table 6.2 - DCGL above background

DCGL (pCi/gram) above background		
Radionuclide	Surface	Subsurface
Ra-226	5	15
U-nat	545	2908
Th-230	46	142

Since there is more than one radionuclide of concern, the criteria for unrestricted use is applied using the unity rule such that the RBD is never exceeded.

In the equations below, the numerator is determined by subtracting the local background from the sample analysis following remediation. It is possible that the background may vary between survey units due to variation in soil types.

The unity rules are:

For surface soil:

$$\frac{A \text{ (pCi/g Ra226)}}{5 \text{ (pCi/g)}} + \frac{B \text{ (pCi/g Unat)}}{545 \text{ (pCi/g)}} + \frac{C \text{ (pCi/g Th230)}}{46 \text{ (pCi/g)}} \leq 1$$

For subsurface soil:

$$\frac{A \text{ (pCi/g Ra226)}}{15 \text{ (pCi/g)}} + \frac{B \text{ (pCi/g Unat)}}{2908 \text{ (pCi/g)}} + \frac{C \text{ (pCi/g Th230)}}{142 \text{ (pCi/g)}} \leq 1$$

MARSSIM requires that the median concentration in a survey unit be demonstrably lower than the DCGL_w following remediation. This is accomplished with a WRS test between soil concentrations in the survey unit and appropriate background reference locations. For the WRS test, the actual concentrations are used for the survey unit rather than using the incremental concentrations, discussed previously in Section 6.4.2.

6.6.3.4 *Gamma Radiation Surveys*

Gamma radiation surveys will be conducted with a GPS-integrated system using 2-inch by 2-inch sodium iodide (NaI) detectors or the equivalent. Statistical correlations will be developed between the radiological soil sample analysis and the gamma radiation count rate. See Section 6.4.2 for the method for development and use of the gamma radiation correlation.

With the GPS-integrated method, high density gamma radiation scanning surveys will be done using the Ludlum 44-10 detectors at a height of 18 inches above the ground. The surveyor speed will be approximately 0.5 m/s.

For Class 1 survey units, transects will be 5 m apart and gamma radiation scanning surveys will continue up to 20 m outside the excavation with averages calculated on each 10-m by 10-m block. Class 1 survey units will scanned at a density to ensure that 95 percent of the 10-m by 10-m blocks have at least 20 gamma radiation measurements for blocks in and adjacent to the excavation areas with measurements in at least three of the four quadrants of the 10-m by 10-m block

The remainder of the survey area outside the remediation area will be classified as Class 2 and will be surveyed at 10 m transects. The requirement for the remainder of the survey area, Class 2, will be that 95 percent of the blocks have at least 10 gamma radiation measurements.

The Class 3 area will include the buffer areas outside the area of contamination, and this area will be surveyed with planned transects of 50 m. Twenty percent or more of the 10 m by 10 m blocks will have at least 10 gamma radiation measurements.

The mean, median, and standard deviation of the 10-m by 10-m averages will be calculated by survey unit for data logged during the scanning surveys.

6.6.3.5 Gamma Radiation Guideline Level

The average gamma radiation count rate will be established over the 10-m by 10-m blocks. A correlation will be established between the gamma radiation level and the unity rule using co-located gamma radiation and soil concentration measurements. The gamma radiation guideline value will be the gamma radiation counts that equate to 0.8 (80 percent of unity rule) from the correlation equation. Locations where the gamma radiation guideline is exceeded will have additional gamma radiation surveys and potentially additional excavation before verification sampling.

6.6.3.6 Selection of Verification Samples

Following completion of excavation, if necessary, verification sampling will be carried out for each survey unit to allow a WRS test with background samples to confirm that the compliance criteria has been met. Ten sampling blocks will be determined from a random sampling approach for each survey unit. Following the final status gamma radiation survey, a minimum of 15 blocks in the survey unit will be measured to confirm the gamma radiation guideline level. For these 15 samples, the five 10- by 10-m blocks with the highest average gamma radiation will be sampled along with another 10 sample blocks randomly selected from the area.

The soil samples from the 10 randomly selected locations will be assessed to determine if the mean concentration in the survey unit is statistically below the unity rule with an alpha error of 0.05 using the MARSSIM WRS test.

The number of samples may be increased per Section 6.6.8.

6.6.3.7 Revision of Correlation

The verification sample measurements (soil analysis and mean gamma radiation counts) will be compared to the correlation to determine if the correlation is statistically valid. The correlation will be updated with the verification measurements if there is less than a 95 percent probability

(p-value of 0.05) that the random verification data is less than DCGL_w. Verification measurements (soil sample and mean gamma radiation counts) will be taken with the same method as the correlation measurements.

6.6.3.7.1 Reporting

For each survey unit, the following will be reported:

1. Number of blocks remediated during remediation phase.
2. Number of blocks with subsequent remediation initiated by gamma radiation measurement.
3. Gamma radiation coverage compliance (i.e. percentage of blocks meeting number of measurement criteria).
4. Mean gamma radiation level averaged over the 10-meter by 10-meter blocks.
5. Mean and range of predicted unity rules based on gamma radiation survey.
6. Mean and range of measured unity rules based on verification sampling.

6.6.3.8 Field Data

The objectives of the survey and sampling activities are to identify the concentrations of residual radioactive material in the survey units so that the unity rule can be evaluated. This information will allow a determination of whether a survey unit is likely to be suitable for release. The average soil concentrations will be evaluated to verify that each radiological DCGL_w is met.

6.6.4 Define the Study Boundaries

The soil in the restricted area will be surveyed for radiological contamination of U-nat, Th-230, and Ra-226. This does not include the tailings cells, and unrestricted areas. Survey units will be established in the unrestricted area if, during the survey of the restricted area, contamination is found at the boundary of the restricted area or if there is reason to believe contamination is present in the unrestricted area.

6.6.5 Develop the Decision Rules/Analytical Approach

If soils exhibit widespread contamination above the $DCGL_w$, then removal of the soil will be necessary or the EMC process will need to be followed to ensure that areas of contamination will not exceed the $DCGL_w$ following excavation.

6.6.6 Define Acceptable Decision Errors

6.6.6.1 Statistical Tests

The WRS test will be used to compare background reference areas to survey units in the MARSSIM framework for the FSS reporting. The WRS test is a nonparametric test used to test for a difference in values between two populations; that is, one data population is hypothesized to consist of higher average values than the other data population.

MARSSIM suggests using the WRS test in cases where the contaminant is present in background at a significant fraction of the $DCGL_w$. Since the $DCGL$ is 5 pCi/g for Ra-226 and the background is in the order of 1 pCi/g or more for Ra-226, the WRS test is the preferred test.

The soil concentrations from the 10 randomly selected locations as defined in Section 6.6.3.6 will be assessed with the WRS test to determine if the median concentration in the survey unit is statistically below the unity rule with an alpha error of 0.05 using the MARSSIM WRS test.

6.6.6.2 Hypothesis

The decisions necessary to determine compliance with the soil cleanup criteria are based on precise statistical statements called hypotheses, which are tested using the data from the survey unit

Null Hypotheses - The situation that is presumed to exist is expressed as the null hypothesis (H_0), which states “*the median concentration in the survey unit exceeds the median concentration in the background reference area by more than the $DCGL$.*”

Alternative Hypotheses - For a given H_0 , there is a specified alternative hypothesis (H_a), which is an expression of what is believed to be the situation if the null hypothesis is not true. The H_a

states “*the median concentration in the survey unit does not exceed the median concentration in the background reference area by more than the DCGL.*”

These hypotheses were chosen for the following two reasons: (1) the burden of proof is placed on the H_A and, (2) the survey unit will not be released until proven to meet the cleanup criterion. In order to pass the WRS using the above H_0 , the median concentration of the systematic samples in the survey unit must be less than the $DCGL_w$ above background.

6.6.6.3 Error Types

Decision errors help to determine the number of samples required. Generally, more samples are required to generate lower decision errors (i.e., the fewer samples, the larger the uncertainty).

The statistical acceptability decisions are designed to avoid two kinds of errors:

- Releasing a survey unit which requires additional remediation
- Remediating a survey unit which is already below the $DCGL_w$

Two possible error types are associated with such decisions, Type I and Type II, which are described below.

Type I – which is also referred to as a false positive, occurs when H_0 is rejected when it is actually true. The probability of a Type I error is usually denoted by α . This error could result in higher potential doses to future site occupants than prescribed by the dose-based criterion. The maximum Type I error rate has been set at $\alpha = 0.05$ (there is less than 5 percent chance of error).

Type II - which is referred to as a false negative, occurs when H_0 is not rejected when it is actually false. The probability of a Type II error is usually denoted by β . Consequences of Type II errors include unnecessary remediation expense and project delays. The Type II error rate has been set at $\beta=0.10$ (there is less than 10 percent chance of error).

Statistical correlations will be developed between the unity rule and the gamma radiation measurements. The unity rule will be determined from measurement data for incremental concentrations at each sample location. The correlation between the unity rule and the gamma

radiation measurement at the sample location will produce a prediction equation. MARSSIM requires that the mean concentration in a survey unit be demonstrably lower than criteria following remediation but does not require all sampling units, in this case the 10-m by 10-m areas, to be lower than the criteria. The precision goal for the relationship will be that the mean prediction uncertainty for the survey unit will be +/- 0.2 when the predicted unity rule is equal to "1".

Protocols will be in place to ensure decision errors are kept to a minimum. For example, instrument quality assurance checks will be required and minimum detectable concentrations (MDCs) will be met.

The gamma radiation survey will be limited by the minimum detectable concentration (MDC) for the 2-inch x 2-inch sodium iodide (NaI) detector which is approximately 104 Bq/Kg (2.8 pCi/gram) for Ra-226, MARSSIM Table 6.7. This MDC is dependent on the background which may raise or lower the MDC (NRC, 2000).

Table 6.3. Reported MDC's from MARSSIM Table 6.7

Nuclide	MDC (Bq/kg)	MDC (pCi/gram)
U-Nat	2960	80
Th-230	78,400	2100
Ra-226 (with decay products in equilibrium)	104	2.8

6.6.7 Relative Shift and Number of Samples

The target decision errors are 0.05 and 0.10 for α and β , respectively. The major contributor to the unity rule is Ra-226 since the criterion is much lower for Ra-226 compared to U-nat and Th-230. The lower bound of the gray region (LBGR) has been set to 0.8 as Ra-226 has a typically concentration that is only about 25 percent of the LBGR and the uncertainty will likely be of this order.

The preliminary estimate is that a relative shift of 2.0 based on the LBGR of 0.8 and an uncertainty of twice the background concentration. Using Table 5.3 of MARSSIM, the required number of samples is 8.

Should any area exceed the $DCGL_{EMC}$ or large areas exceed the $DCGL_W$, remediation of the affected areas would be completed prior to resampling.

6.6.8 Optimize the Design

Initially, gamma radiation scans will be conducted in the restricted areas of the mill site. The data from these scans will be reviewed to determine the location of any hotspots. These hotspot locations will be sampled to determine the activity concentrations of U-nat, Th-230, and Ra-226. A prediction equation of the unity rule will provide the basis for scanning large areas effectively to direct focused remediation and to ensure that the cleanup criterion is met.

The statistical test (WRS test) could fail to show that the mean is below the criterion due to the initial number of verification samples, since there may be insufficient samples to achieve the desired decision error rates given the characteristics of the survey unit. In cases where data suggest that the concentration is below the criterion (e.g., the mean bases), additional samples would reduce the decision error and potentially allow the survey unit to pass. In this case, the mean and variability of the 10 randomly selected measurements will be used to determine MARSSIM's relative shift with the lower bound of the gray region equal to 0.8 of the unity rule. The α error will be set to 5 percent and the β error set to 10 percent to determine the required total number of samples. These samples would be collected and the WRS repeated on the larger data set.

6.7 Soil Sampling

6.7.1 Laboratory Approval

All samples will be analyzed for radionuclide concentration (pCi/g). All analyses will be performed by a Utah DWMRC-approved/certified laboratory and a DOE-certified, or National Environmental Laboratory Accreditation Program (NELAP)-certified laboratory. The laboratory

shall analyze method blanks, matrix spike samples, laboratory control samples and replicates. Typical required detection levels will be less than or equal to one tenth of the DCGL for each radionuclide.

6.7.2 Data Validation

Laboratory analytical results from the final status survey will be validated and will be reviewed by the data validator for the following:

- Data completeness/sample integrity
- Holding times
- Calibration
- Alpha spectroscopy tracer analysis
- Laboratory and field blanks
- Laboratory control samples
- Laboratory and field duplicates
- Alpha spectroscopy matrix spikes
- Quantitation and detection limits
- Alpha spectroscopy chemical separation specificity
- Gamma radiation spectroscopy target radionuclide list identification
- Secular equilibrium verification, and result verification

Review of these parameters serves to ensure the quality of the data with respect to:

- Precision – which is a measure of the reproducibility of an analysis under a given set of conditions. Precision was evaluated through a review of field duplicate and laboratory duplicate samples.
- Accuracy – which is a measure of the bias that exists in a measurement system. Accuracy was evaluated through a review of laboratory control samples, matrix spike samples, method blanks, and tracer recoveries.

- Representativeness – which is a measure of the degree to which the sampling data accurately and precisely represent site conditions. Representativeness was evaluated through a review of raw data and through a comparison of whether the proposed scoping survey was implemented.
- Comparability – which is a measure of the degree of confidence with which two data sets can be compared to each other. Comparability was evaluated through an assessment of whether appropriate and acceptable analytical methods were used.
- Completeness – which is a measure of the amount of valid data obtained.

6.8 Employee Health and Safety

Programs currently in place for monitoring of exposures to employees will remain in effect throughout the time period during which tailings cell reclamation, mill decommissioning and clean up of windblown contamination are conducted. This will include personal monitoring and the ongoing bioassay program. Access control will be maintained at the Restricted Area boundary to ensure employees and equipment are released from the site in accordance with the current License conditions. In general, no changes to the existing programs are expected and reclamation activities are not expected to increase exposure potential beyond current levels.

6.9 Environment Monitoring

Existing environmental monitoring programs will continue during the time period in which reclamation and decommissioning is conducted. This includes monitoring of surface and groundwater, airborne particulates, radon, soils and vegetation according to the existing License conditions. In general, no changes to the existing programs are expected and reclamation activities are not expected to increase exposure potential beyond current levels.

6.10 Quality Assurance

In general, the QA/QC Plan details the Owner's organizational structure and responsibilities, personnel qualifications, operating procedures and instructions, record keeping and document control, sampling procedures and outside laboratory testing.

7.0 MATERIAL DISPOSAL

7.1 General

This section outlines work associated with placement of materials in the disposal cell and tailings cells.

7.2 Materials Description

The types of materials to be disposed of are outlined below.

7.2.1 Raffinate Crystals

After the residual liquid in Cell 1 has been evaporated, the Contractor will remove the raffinate crystals from Cell 1 and move them to the tailings disposal cells. The crystals are likely to have the consistency of a granular material and have larger crystal masses that require breaking down for loading and transport (using the loading equipment).

7.2.2 Synthetic Liner

The existing PVC liner shall be removed from Cell 1 and disposed of in the tailings disposal area.

7.2.3 Contaminated Soils

During remediation, soils located in and around the mill site exceeding the gamma radiation guideline value will be placed in the tailings disposal cells. Soils excavated from Cell 1 shall be placed in the tailings disposal cells.

7.2.4 Mill Debris

The mill debris will include all equipment, including tankage and piping, agitation equipment, process control instrumentation and switchgear, and contaminated structures; including concrete structures and foundations, will be placed in the disposal cell.

7.3 Work Description

Materials described will be spread over the working surface as much as possible to provide relatively uniform settlement and consolidation characteristics of the cleanup materials.

7.3.1 Raffinate Crystals

Raffinate crystals will be removed from Cell 1 and transported to the tailings cells. Placement of the crystals will be performed as a granular fill, with care being taken to avoid nesting of large sized material. Voids around large material will be filled with finer material or the crystal mass will be broken down by the equipment. Actual placement procedures will be evaluated by the QC officer during construction as crystal materials are placed in the cells and modified with the agreement of the DWMRC.

7.3.2 Synthetic Liner

The PVC liner will be cut, folded (when necessary), removed from Cell 1, and transported to the tailings cells. The liner material will be spread as flat as practical over the designated area. After placement, the liner will be covered as soon as possible with at least one foot of soil, crystals or other materials for protection against wind uplift, as approved by the CQA Manager.

7.3.3 Contaminated Soils

The extent of contamination of the mill site will be determined by gamma radiation survey as described in Section 6. A correlation between gamma survey readings and the unity rule concentrations will be developed. Gamma survey readings can then be used to define cleanup areas and to monitor the cleanup. Soil sampling will be conducted to confirm that the cleanup results in levels that meet criteria described in 7.2.3.

Where surveys indicate the above criteria have not been achieved, the soil will be removed to meet the criteria. Soil removed from Cell 1 will be excavated and transported to the tailings cells.

7.3.4 Mill Debris

Placed debris will be spread across the bottom of the disposal cell to avoid nesting and to reduce the volume of voids present in the disposed mass. Stockpiled soils and/or other approved materials will be placed over and into the scrap in sufficient amount to fill the voids between the large pieces and the volume within the hollow pieces to form a coherent mass. It is recognized that some voids will remain because of the scrap volume reduction specified, and because of practical limitations of these procedures. Reasonable effort will be made to fill the voids. The approval of the CQA Manager or a designated representative will be required for the use of materials other than stockpiled soils for the purpose of filling voids.

7.3.5 Material Sizing and Preparation

Demolition debris to be placed in the disposal cell will consist of equipment and structural material from facilities demolition. Demolition procedures are outlined in the Preliminary Mill Decommissioning Plan. Because of the wide variety in shape and size of demolition debris, material of odd shapes will be cut or dismantled, to the extent practical, prior to disposal, to facilitate handling and placement and minimize void spaces in the disposal cell. The maximum size of dismantled or cut materials shall not exceed 20 feet in the longest dimension and a maximum volume of 30 cubic feet for placement in the cells. Smaller dimensions may be necessary for loading, handling, hauling, and placement of material in the disposal cell.

The debris, after having been reduced in dimension and volume if required, will be placed in the tailings cells as directed by the CQA Manager.

7.3.6 Incompressible Debris

Material that is not compressible (steel columns and beams, concrete, and other solid material) shall be reduced in size for loading, hauling, and placement in the disposal cell. Incompressible debris shall be placed, oriented, or spread in a manner that minimizes void spaces below, between, and above these materials. Incompressible debris shall be placed on and covered with soils or similar materials (Specification Section 7.3.3). Incompressible debris such as steel members shall be placed in the disposal cell with the longest dimension oriented horizontally.

Thick-walled pipe, conduit, tanks, vats, pressure vessels, and other hollow materials that cannot be crushed or dismantled shall be transported to the planned location within the disposal cell and oriented for filling and burial. The voids on the inside of the item shall be filled with contaminated soil, clean fill soil, or grout (controlled low-strength material, flowable fill, etc.). Contaminated soil (Section 7.3.3) or clean fill will be placed outside of the items and compacted with standard compaction equipment (where possible) or hand-operated equipment to the compaction requirements in Specification Section 7.4. Several lifts of compacted contaminated soil or clean fill may be necessary to fill around and cover these items.

For debris where internal voids cannot practically be filled with soil, a grouting program would be initiated to pump controlled low strength material (CLSM, flowable fill) into the voids. Debris would be grouped together and characterized as materials that would require grouting, so that a significant volume of debris can be grouted in a single action, rather than grouting individual lengths of pipe. Pipe sections could be stacked horizontally, or cut short enough to stand vertically in a safe manner. Grout would then likely be batched offsite and delivered to the site and a pump truck would likely be required to place the material within the debris, within the cell. A soil berm would be used to contain the grout laterally around the perimeter of the selected debris. The debris voids would be grouted, and grout would also be placed around the debris to develop a monolithic grouted mass.

If CLSM is required for the grouting of voids that cannot be filled mechanically with soil, the mix design for the grout should mimic, as closely as possible, the strength and hydraulic properties of the contaminated soil that will also be used for filling voids within the debris. This will minimize any effects of differential settlement that would result from the grout having a higher strength and being less compressible than the surrounding soil.

The unconfined compressive strength of the CLSM should be between 30 psi (minimum) and 150 psi (maximum), and unit weights should be approximately 100 to 120 pcf.

7.3.7 Compressible Debris

Materials that are compressible (such as thin-walled piping and thin-walled tanks) shall be flattened or crushed in the disposal cell, prior to final placement. Flattening or crushing shall be done with hydraulic excavator attachments, or with a dozer or other steel-tracked equipment.

These materials shall be placed in the disposal cell and spread to form a lift with a maximum thickness of two feet. Spreading shall be done in a manner resulting in materials lying flat and minimizing void spaces. All pipe that shall be cut into lengths of approximately 10 feet or less for disposal. Pipe larger than 12 inches in diameter shall be longitudinally split or cut.

7.3.8 Organic Debris

The volume of organic materials (such as wood and paper) that may be prone to long-term biodegradation within the cell is anticipated to be a small percentage of the material being disposed. However, to limit the potential for settlement due to consolidation of organics, the contractor shall not dispose of organic materials in any lift thicker than 12 inches. The material shall be spread with a dozer in lifts, or thoroughly mixed with soil that will be placed around incompressible debris, and compacted. Organics mixed with soil for spreading shall be limited to 30 percent by volume of the mixture.

7.3.9 Soils and Similar Materials

Soils and soil-like materials to be placed in the disposal cell will be from on-site areas identified by EFRI for excavation. Soil or soil-like material shall be placed and compacted over each lift of debris (Section 7.2.4) or other materials in lifts not to exceed two feet in loose thickness and compacted prior to placement of additional lifts. Soils will also be used for interim soil cover to minimize exposure of demolition materials and other materials to air and meteoric water.

7.4 Performance Standards and Testing

7.4.1 Material Compaction – Debris Lifts

During construction, the compaction requirements for the crystals will be evaluated based on field conditions and material quantities. The compaction requirements will be determined by the

CQA Manager and the Reclamation Project Manager or a designated representative, with the agreement of the Owner.

The debris, contaminated soils and other materials for the first lift will be placed to a depth of up to four feet thick, in a bridging lift, to allow access for placing and compacting equipment. The first lift will be compacted by the tracking of heavy equipment, such as a Caterpillar D6 Dozer (or equivalent), using at least four passes, prior to the placement of the next lift. Subsequent lifts will not exceed 12 inches and will be compacted using a minimum of four passes with the tracked equipment.

Soil or similar material shall be compacted with a minimum of 6 passes with self-propelled, towed, or hand-held vibratory compaction equipment. The number of passes shall be confirmed with actual compaction equipment on site with a field test section of soil to establish a correlation between the field compaction method and 80 percent of maximum dry density for the soil, as determined by the standard Proctor test (ASTM D698). During compaction, the material shall be within 1 percent above to 4 percent below optimum moisture content for the material, as determined by the standard Proctor test. If water addition is required to achieve this range of moisture contents, the added water shall be thoroughly mixed into the material prior to compaction.

The CQA technicians will monitor and approve of the final debris placement. In areas where voids are observed during placement, the contractor shall re-excavate the area, fill any voids encountered with soil and recompact the materials, or grout the voids. The CQA technicians will make a recommendation to the Contractor for the implementation of a grouting program where voids, either within a debris mass, or within a vessel, cannot be properly filled with soil using conventional equipment.

7.4.2 Material Compaction - Disposed Materials

The upper 12 inches of the final disposed material surface shall be compacted to 90 percent of the maximum dry density for the material, as determined by the Standard Proctor test. During compaction, the material shall be within 1 percent above to 4 percent below optimum moisture

content for the material, as determined by the standard Proctor test. If water addition is required to achieve this range of moisture contents, the added water shall be thoroughly mixed into the material prior to compaction.

7.4.3 Testing Frequency

Field density tests shall be compared with standard Proctor tests (ASTM D698 Method A or C) on the same material. Standard Proctor tests shall be conducted at a frequency of at least one test per 5,000 cubic yards of material compacted, or when material characteristics show significant variation.

Field density testing may be conducted with the sand cone test (ASTM D1556) or a nuclear density gauge (ASTM D6938, or as modified by the QA Manager). Correlation of nuclear density gauge results shall be by comparison with results from sand cone test(s) and laboratory testing for water content(s) using the oven drying method (ASTM D2216) on similar material.

The frequency of the field density and moisture tests will be not less than one test per 1,000 cubic yards of compacted fill. A minimum of two tests will be taken for each day that an applicable amount of fill is placed in excess of 150 cubic yards. A minimum of one test per lift and at least one test for every full shift of compaction operations will be taken.

7.4.4 Final Slope and Grades

The final disposed material surface shall have maximum side slopes of 5:1 and a top surface sloping in the directions and grades shown on the Drawings. The side slopes and top surface shall be free from abrupt changes in grade or areas of runoff concentration. The final disposed material surface shall be compacted with approved construction equipment to form a smooth surface with uniform density for subsequent cover placement.

8.0 COVER CONSTRUCTION

8.1 General

This section outlines work associated with construction of the earthen cell cover. A multi-layered earthen cover will be placed over tailings Cells 2, 3 and 4A and a portion of Cell 1 used for disposal of contaminated materials (the Cell 1 Disposal Area).

8.2 Materials Description

8.2.1 Cover Random Fill

The random fill for the radon attenuation layers, and the water storage/frost protection layer will consist of a mixture of sands and silts with varying amounts of clay.

In the initial bridging (platform) lift of the tailings, rock sizes of up to 2/3 of the thickness of the lift will be allowed. On all other fill lifts, rock sizes will be limited to 2/3 of the lift thickness, with at least 30 percent of the material finer than the No. 40 sieve. The portion passing the No. 40 sieve, will classify as CL, SC, ML or SM materials under the Unified Soil Classification System. Oversized material will be controlled through selective excavation at the stockpiles and through the utilization of a grader, bulldozer or backhoe to cull oversize materials from the fill.

The source of these materials will be on-site stockpiles from previous cell construction activities.

8.2.2 Organic Matter Amendment

Composted biosolids will be used to amend the physical and chemical properties of the water storage/frost barrier material for plant growth (Section 8.3.7). Composted biosolids will be added to the upper six inches of the water storage fill material at a rate of 10 tons/acre.

8.2.3 Rock Mulch

Gravel will be mixed with topsoil and placed on portions of the cover on Cells 2, 3, 4A, and 4B top surfaces (as shown on the Drawings) for erosion protection. Rock mulch material shall be free from roots, branches, rubbish, and debris.

The rock portion of the rock mulch will consist of granular materials from approved off-site areas. The mixture shall be 25 percent gravel by weight. The rock (gravel) portion of the rock mulch shall be a screened product and have a D₁₀₀ particle size of less than 1-inch (100 percent passing the 1-inch sieve).

The soil portion of the rock mulch will consist of select material from the on-site topsoil borrow area (Section 3.5).

8.2.4 Erosion Protection and Perimeter Apron Rock

Material for the perimeter apron erosion protection will consist of granular materials from approved off-site sources. The perimeter apron rock will be placed along the toe of the disposal cell and the tailings cells in the erosion protection areas (as shown on the Drawings). Perimeter apron rock shall meet NRC long-term durability requirements (a rock quality designation of 65 or more).

Perimeter apron rock shall be a screened product, free from roots, branches, rubbish, and debris. The specifications as given below are for rock quality designations of 70 or higher. If actual rock quality designation is between 65 and 69, oversizing will be required. Rock quality designations below 65 will not be acceptable.

Designated gradations for the apron rock will be as specified on the Drawings. Apron rock will be imported from off-site.

- Side Slope riprap shall have a minimum D₅₀ as listed below and a minimum layer thickness of 1.5 times the D₅₀ or the D₁₀₀ of the riprap, whichever is greater:
 - 1.7 in. for non-accumulating flow side slopes
 - 5.3 in. for Cell 4A and Cell 4B southern side slopes
 - 4.5 in. for Cell 1 Disposal Area side slope

- Rock aprons shall have a minimum D_{50} as listed below and a minimum layer thickness of 1.5 times the D_{50} or the D_{100} of the riprap, whichever is greater
 - 3.4 in. for Rock Apron A
 - 10.5 in. for Rock Apron B
 - 9.0 in. for Rock Apron C

8.2.5 Erosion Protection Filter

Erosion protection filter material shall be free from roots, branches, rubbish, and debris. The filter material will generally classify as sand containing gravel and fines and shall meet the following gradation specifications.

Table 8.1 – Filter Material Gradation

Sieve Size	Percent Passing, By Weight
3-inch	100
No. 4	70-100
No. 20	40-60
No. 200	0-5

8.2.6 Topsoil

Topsoil will consist of select material from the designated, on-site topsoil borrow area (Section 3.5). The topsoil shall have a plasticity index (PI) less than 10 (%), as determined by Atterberg limits testing.

8.3 Work Description

The contractor will place cover materials based on a schedule determined by the Owner and the Owner's analysis of settlement data, piezometer data and equipment mobility considerations. The DWMRC must approve fill grades and elevations prior to placement of final cover materials. Settlement monitoring points (both temporary and permanent) will be established and

monitored in accordance with Sections 8.3.1 to 8.3.3 of the Technical Specifications and the Settlement Monitoring Plan approved by DWMRC for the site.

In each layer of the cover, the distribution and gradation of the materials throughout each fill layer will be such that the fill will, as far as practicable, be free of lenses, pockets, or layers of material differing substantially in texture, gradation or moisture content from the surrounding material. Nesting of oversized material will be controlled through selective excavation of stockpiled material, observation of placement by a qualified individual with authority to stop work and reject material being placed and by culling oversized material from the fill utilizing a grader. Successive loads of material will be placed on the fill so as to produce the best practical distribution of material.

If the compacted surface of any layer of fill is too dry or smooth to bond properly with the layer of material to be placed thereon, it will be moistened and/or reworked with a harrow, scarifier, or other suitable equipment to a sufficient depth to provide relatively uniform moisture content and a satisfactory bonding surface before the next succeeding layer of fill is placed. If the compacted surface of any layer of fill in-place is too wet, due to precipitation, for proper compaction of the fill material to be placed thereon, the contractor will rework the material with a harrow, scarifier or other suitable equipment to reduce the moisture content to the specified range. The contractor will then recompact the fill.

No material will be placed when either the material being compacted, or the underlying material, is frozen or when ambient temperatures do not permit the placement or compaction of the materials to the specified density, without developing frost lenses in the fill.

8.3.1 Monitoring Interim Cover Settlement

The contractor will maintain the existing settlement monitoring points located within tailings disposal cells by extending them through additional fill placement. For areas without settlement monitoring points, the contractor will install temporary settlement points to monitor settlements of the interim cover surface. The temporary settlement points will consist of wooden stakes, rebar, or an approved equivalent; set a minimum of 12 inches into the interim cover surface.

Settlement data will be collected and analyzed; and the reclamation techniques and schedule will be adjusted accordingly.

8.3.2 Monitoring Final Cover Settlement

After placement of final cover material, the contractor will install permanent settlement plates to monitor settlement of the final cover surface. The settlement plates will consist of a corrosion resistant steel plate (1/4-inch thick; two-foot square to which a one-inch diameter corrosion resistant monitor pipe has been welded. The one-inch diameter monitor pipe will be surrounded by a three-inch diameter guard pipe which will not be attached to the base plate.

The installation will consist of leveling an area on the surface and placing the base plate directly on the cover soil. A minimum of two feet of initial soil will be placed on the base plate for a minimum radial distance of five feet from the center pipe.

8.3.3 Monitoring Settlement Points

Settlement monument placement and data collection will be made in accordance with the DWMRC approved Settlement Monitoring Plan.

8.3.4 Platform Layer Fill

A layer of 2.5 feet of platform fill will be placed over the tailings surface to form a stable working platform for subsequent controlled fill placement. This platform fill will be placed by pushing random fill material across the tailings in increments such that the underlying tailings are displaced as little as possible. The fill soils shall be placed in lifts of 12-inch maximum loose thickness to form a uniform subsoil layer for the cover system. A rough surface will be maintained on the surface of each lift.

8.3.5 Highly Compacted Layer

The highly compacted layer shall be placed in lifts with maximum compacted thickness of 6 inches to form a continuous layer with a total minimum compacted layer thickness of 30 inches. A rough surface will be maintained on the surface of each lift. If water addition is required to

achieve the required range of moisture contents, the added water shall be thoroughly mixed into the material prior to compaction.

8.3.6 Water Storage Layer Fill Placement

Random fill will be placed to a minimum of 42 inches thick, above the highly compacted layer in 18-inch lifts. If oversized material is observed during the excavation of fill material, it will be removed, as far as practicable, before it is placed in the fill. A rough surface will be maintained on the surface of all but the uppermost lift. If water addition is required to achieve the required range of moisture contents, the added water shall be thoroughly mixed into the material prior to placement.

8.3.7 Organic Matter Amendment

Composted biosolids will be applied prior to the placement of topsoil or the topsoil-gravel mixture. Composted biosolids will be uniformly spread over the surface of the water storage layer (frost barrier) and mixed to a depth of 6 in. (15 cm). The soil amendment will be applied prior to placement of the topsoil and topsoil-rock mixture.

8.3.8 Rock Mulch Placement

The contractor shall provide a method of thoroughly mixing the topsoil and the gravel mixture to provide the 25 percent gravel- 75 percent topsoil mixture (by weight). The mixture shall be prepared prior to transport to the placement areas. Gradation samples will be collected at the point of placement (on the topdeck) to verify the mixture's content. The CQA manager will approve the contractor's proposed method of mixing based on the gradation results during initial placement.

The mixture shall be placed in one loose lift to form a uniform layer with a final thickness of 6 inches on the slope surfaces of the disposal cell (shown on the Drawings). The gravel-topsoil mixture shall be spread with tracked equipment and compacted using two passes with rubber-tracked equipment. Low-ground pressure equipment may be necessary to prevent overcompaction of the mixture. Field density tests will be conducted to monitor and prevent overcompaction of the material.

The topsoil-gravel erosion control layer will not be amended for organic matter or nutrients to avoid the stimulation of undesirable weedy species.

Following placement of the topsoil-gravel erosion protection layer, the area shall be harrowed to reduce any compaction that may have occurred during placement of the cover and to create an uneven surface for optimum seedbed conditions.

8.3.9 Topsoil Placement

Topsoil (Section 8.2.7) shall be placed in one loose lift to form a uniform layer with a final thickness of 6 inches on the top and side slope surfaces of the disposal cell (shown on the Drawings). The topsoil shall be spread with tracked equipment and compacted using two passes with rubber-tracked equipment. Low-ground pressure equipment may be necessary to prevent over-compaction of the topsoil.

The topsoil layer will not be amended for organic matter or nutrients to avoid the stimulation of undesirable weedy species.

Following placement of the topsoil layer, the area will be harrowed to reduce any compaction that may have occurred during placement of the cover and to create an uneven surface for optimum seedbed conditions.

8.3.10 Rock and Filter Material Placement

The side slopes of the reclaimed cover will be protected by rock surfacing. Riprap, perimeter apron rock (Section 8.2.5), and erosion protection filter material (Section 8.2.6) shall be placed in one or more lifts to the depths outlined in the Drawings and using the methods outlined below.

The Drawings show the location of rock protection with the size and thickness requirements for the various side slopes and aprons.

Filter material and rock shall be handled, loaded, transported, stockpiled, and placed in a manner that minimizes segregation. Rock and filter material shall be placed in or near its final location by dumping, then spreading with a small dozer, the bucket of a trackhoe, or other suitable equipment. Rock and filter material shall be placed and spread in a manner that minimizes

displacement of underlying cover soils, natural soils, or filter material. Each layer of rock and filter material shall be track-walked with a small dozer, tamped with the bucket of a trackhoe, or densified by other approved methods.

Placement of the riprap will avoid accumulation of riprap sizes less than the minimum D_{50} size and nesting of the larger sized rock. The riprap layer will be compacted by at least two passes by a D7 Dozer, tamping with the bucket of a trackhoe, or equivalent methods in order to key in the rock particles for stability. The completed layer of rock mulch and filter material shall be well-graded in particle-size distribution and free from pockets of smaller material and free from large voids or loose areas.

8.4 Performance Standard and Testing

8.4.1 Platform Fill Testing

Compaction of the platform fill will be dictated by the methods used by EFRI in platform fill placement.

Prior to placement of the highly compacted layer material, the top surface platform fill will be compacted to at least 95 percent of the maximum dry density for the material as determined by the standard Proctor test. The upper 6 inches of the platform fill shall be tested for compaction according to Section 8.4.2. Placement of platform fill will be monitored by a qualified individual with the authority to stop work and reject material being placed.

8.4.2 Highly Compacted Layer Testing

Each lift of the highly compacted layer shall be compacted to at least 95 percent of the maximum dry density for the material, as determined by the standard Proctor test (ASTM D698). Water contents should be adjusted, as needed, to meet the density requirements.

Material specifications for the random fill material shall be confirmed by gradation testing conducted by approved personnel. Testing shall consist of No. 200 sieve wash and particle-size distribution testing (ASTM D422) and Atterberg limits (ASTM D4318) at a frequency of at least

one test per 2,000 cubic yards of fill placed, or when material characteristics show a significant variation.

Checking of compaction shall consist of a minimum of one field density test per 500 cubic yards of material compacted. A minimum of two tests shall be taken for each day that an applicable amount of fill is placed in excess of 150 cubic yards. A minimum of one test per lift and at least one test for every full shift of compaction operations will be taken.

Field density tests shall be compared with Standard Proctor tests (ASTM D698 Method A or C) on the same material. Standard Proctor tests shall be conducted at a frequency of at least one test per 2,500 cubic yards of material compacted, or when material characteristics show significant variation.

Field density testing may be conducted with the sand cone test (ASTM D1556) or a nuclear density gauge (ASTM D6938, or as modified by the QA Manager). Correlation of nuclear density gauge results shall be by comparison with results from sand cone test(s) and laboratory testing for water content(s) using the oven drying method (ASTM D2216) on similar material.

8.4.3 Water Storage Layer Fill Material Testing

Material specifications for the random fill for water storage layer shall be confirmed by gradation testing conducted by approved personnel. Testing shall consist of No. 200 sieve wash and particle-size distribution testing (ASTM D422) and Atterberg limits (ASTM D4318) at a frequency of at least one test per 2,000 cubic yards of fill placed, or when material characteristics show a significant variation. Cover material compaction will be verified by the maximum lift thickness outlined in Section 8.3.6.

Each lift of this upper fill material layer shall be compacted to at least 85 percent of the maximum dry density for the material, as determined by the standard Proctor test (ASTM D698). Water contents should be adjusted, as needed, to meet the density requirements.

The frequency of the field density and moisture tests will be not less than one test per 1,000 cubic yards of compacted fill. A minimum of two tests will be taken for each day that an

applicable amount of fill is placed in excess of 150 cubic yards. A minimum of one test per lift and at least one test for every full shift of compaction operations will be taken.

Field density tests shall be compared with Standard Proctor tests (ASTM D698 Method A or C) on the same material. Standard Proctor tests shall be conducted at a frequency of at least one test per 5,000 cubic yards of material compacted, or when material characteristics show significant variation.

Field density testing may be conducted with the sand cone test (ASTM D1556) or a nuclear density gauge (ASTM D6938, or as modified by the QA Manager). Correlation of nuclear density gauge results shall be by comparison with results from sand cone test(s) and laboratory testing for water content(s) using the oven drying method (ASTM D2216) on similar material.

8.4.4 Topsoil Testing

Material specifications for the topsoil material shall be confirmed by Atterberg limits testing (ASTM D4318) on samples of the topsoil, once for each 1,000 cubic yards of total topsoil material placed (including the quantity of topsoil added to the rock mulch mixture).

The topsoil shall be compacted to between 80 and 85 percent of the maximum dry density for the material, as determined by the standard Proctor test. During placement, the material shall be within the optimum moisture content and 3 percent below the optimum moisture content for the material, as determined by the standard Proctor test.

Checking of compaction of the topsoil shall consist of a minimum of one field density test per 500 cubic yards of material placed. A minimum of two tests shall be taken for each day that an applicable amount of fill is placed in excess of 150 cubic yards. A minimum of one test per lift and at least one test for every full shift of placement operations will be taken.

Field density tests shall be compared with Standard Proctor tests (ASTM D698 Method A or C) on the same material. Standard Proctor tests shall be conducted at a frequency of at least one test per 2,500 cubic yards of material placed, or when material characteristics show significant variation.

Field density testing may be conducted with the sand cone test (ASTM D1556) or a nuclear density gauge (ASTM D6938, or as modified by the QA Manager). Correlation of nuclear density gauge results shall be by comparison with results from sand cone test(s) and laboratory testing for water content(s) using the oven drying method (ASTM D2216) on similar material.

8.4.5 Rock Mulch Testing

The maximum particle size for the rock used for rock mulch material shall be confirmed by gradation testing prior to mixing with the topsoil, to determine the maximum particle size. Testing shall consist of particle-size distribution testing (ASTM D422) at a frequency of at least one test per 2,000 cubic yards of rock delivered to the site, or when rock characteristics show a significant variation.

The gradation specifications for the rock mulch material (topsoil-gravel mixture) (Specification Section 8.2.4) shall be confirmed by gradation testing, on samples collected from the point of placement (on the topdeck). Testing shall consist of particle-size distribution testing (ASTM D422) at a frequency of at least one test per 2,000 cubic yards of mixture placed, or when the characteristics of the mixture show a significant variation. The QA Manager may choose to conduct to increase the frequency of testing at the beginning of placement to evaluate the mixing method proposed by the contractor.

Rock mulch thickness will be controlled through the establishment of grade stakes placed on a 200 x 200 foot grid on the top of the cells and by a 100 x 100 foot grid on the cell slopes. Physical checks of rock mulch depth will be accomplished through the use of hand dug test pits at the center of each grid in addition to monitoring the depth indicated on the grade stakes.

The rock mulch mixture shall be compacted to between 80 and 85 percent of the maximum dry density for the material, as determined by the standard Proctor test. During placement, the material shall be within the optimum moisture content and 3 percent below the optimum moisture content for the material, as determined by the standard Proctor test.

Checking of compaction of the rock mulch mixture shall consist of a minimum of one field density test per 500 cubic yards of material placed. A minimum of two tests shall be taken for each day that an applicable amount of fill is placed in excess of 150 cubic yards. A minimum of one test per lift and at least one test for every full shift of placement operations will be taken.

Field density tests shall be compared with Standard Proctor tests (ASTM D698 Method A or C) on the same material. Rock corrections (ASTM D4718) for oversize particles may be required for the mixture depending on the gradation of the gravel material selected. Standard Proctor tests shall be conducted at a frequency of at least one test per 2,500 cubic yards of material placed, or when material characteristics show significant variation.

Field density testing may be conducted with the sand cone test (ASTM D1556) or a nuclear density gauge (ASTM D6938, or as modified by the QA Manager). Correlation of nuclear density gauge results shall be by comparison with results from sand cone test(s) and laboratory testing for water content(s) using the oven drying method (ASTM D2216) on similar material.

The durability of the rock shall be verified by durability tests outlined in Specification Section 8.4.8.

8.4.6 Erosion Protection and Perimeter Apron Rock Testing

Material specifications for the perimeter apron rock shall be confirmed by gradation testing conducted by approved personnel. Testing shall consist of particle-size distribution testing (ASTM D422) at a frequency of at least one test per 2,000 cubic yards of rock delivered to the site, or when rock characteristics show a significant variation.

Rock layer thickness will be controlled through the establishment of grade stakes placed on a 200 x 200 foot grid on the top of the cells and by a 100 x 100 foot grid on the cell slopes. Physical checks of riprap depth will be accomplished through the use of hand dug test pits at the center of each grid in addition to monitoring the depth indicated on the grade stakes.

The durability of the rock shall be verified by durability tests outlined in Specification Section 8.4.8.

8.4.7 Erosion Protection Filter Testing

Material specifications for erosion protection filter material (Section 8.2.6) shall be confirmed by gradation testing conducted by approved personnel. Testing shall consist of No. 200 sieve wash and maximum particle size testing (ASTM D422) at a frequency of at least one test per 10,000 cubic yards of fill placed, or when material characteristics show a significant variation.

Filter layer thickness will be established during construction with grade stakes placed on a grid or centerline and offset pattern and layer thickness marks on each grade stake. The minimum thickness of the layer will be verified by spot checking of layer thickness by hand excavation in selected locations.

8.4.8 Rock Durability Testing

For riprap materials, each load of material will be visually checked against standard piles for gradation prior to transport to the tailings piles. Prior to delivery of any riprap materials to the site, rock durability tests will be performed for each gradation to be used. Test series for riprap durability will include specific gravity, absorption, sodium soundness and LA abrasion. During construction, additional test series and gradations will be performed for each type of riprap when approximately one-third ($1/3$) and two-thirds ($2/3$) of the total volume of each type have been produced or delivered. For any type of riprap where the volume is greater than 30,000 cubic yards, a test series and gradations will be performed for each additional 10,000 cubic yards of riprap produced or delivered.

8.5 Surface Slopes and Grades

The final cover surface shall have maximum side slopes of 5:1 and a top surface sloping in the direction and grade shown on the Drawings. The side slopes and top surface shall be free from abrupt changes in grade or areas of runoff concentration. The perimeter apron at the toe of the side slopes shall have a minimum width of 20 feet from the toe of the side slopes and slope away from the toe of the side slopes (as shown on the Drawings).

8.6 Grading Tolerances

The completed cover surface shall be constructed to within 1.0 foot (horizontally) of the lines as designed, and within 0.1 foot (vertically) of the elevations as designed. The final surface of the subsoil zone shall be smoothed to avoid abrupt changes in surface grade. The layer thicknesses shall meet the required minimum thicknesses.

The completed riprap shall be placed to within 5.0 foot (horizontally) of the layout as designed, and within 0.5 foot (vertically) of the elevations as designed. The rock layer thicknesses shall meet the minimum requirements.

9.0 REVEGETATION

9.1 General

Following topsoil placement, the cover surface and other areas disturbed during reclamation work will be revegetated. This section outlines the requirements for vegetation establishment where required. This section may be revised as necessary based on field requirements and soil nutrient analyses at the time of revegetation.

9.2 Materials Description

The soil amendments, seed mixture, and erosion control materials for revegetation are outlined below. Submittals for each of the following products shall be provided to the Owner for approval prior to use of such products.

9.2.1 Soil Amendments

The proposed application rate may be adjusted up or down based on soil chemical analysis that is conducted prior to placement of the water storage layer.

Composted biosolids shall be added at a rate of 10 tons/acre and uniformly spread over the surface of the water storage layer and mixed to a depth of 15 cm. This treatment will be applied after the water storage layer is in-place and before placement of the topsoil-gravel erosion protection layer.

9.2.2 Seed Mix

Species selection for the seed mixture was based on native vegetation found in the area as well as soil and climatic conditions of the mill site. Changes to the seed mixture will be as approved by EFRI. The following seed mixture shall be used on all seeded areas.

Table 9.1. Species and seeding rates proposed for Mill site.

Scientific Name	Common Name	Varietal Name	Native/ Introduced	Seeding Rate (lbs PLS/acre) [†]	Seeding Rate (# seeds/ft ²)
Grasses					
<i>Pascopyrum smithii</i>	Western wheatgrass	Arriba	Native	3.0	7.9
<i>Pseudoroegneria spicata</i>	Bluebunch wheatgrass	Goldar	Native	3.0	9.6
<i>Elymus trachycaulus</i>	Slender wheatgrass	San Luis	Native	2.0	6.2
<i>Elymus lanceolatus</i>	Streambank wheatgrass	Sodar	Native	2.0	7.3
<i>Elymus elymoides</i>	Squirreltail bottlebrush	Toe Jam	Native	2.0	8.8
<i>Thinopyrum intermedium</i>	Pubescent wheatgrass	Luna	Introduced [‡]	1.0	1.8
<i>Achnatherum hymenoides</i>	Indian ricegrass	Paloma	Native	4.0	14.7
<i>Poa secunda</i>	Sandberg bluegrass	Canbar	Native	0.5	11.4
<i>Festuca ovina</i>	Sheep fescue	Covar	Introduced [‡]	1.0	11.5
<i>Bouteloua gracilis</i>	Blue grama	Hachita	Native	1.0	16.5
<i>Hilaria jamesii</i>	Galleta	Viva	Native	2.0	7.3
Forbs					
<i>Achillea millefolium</i> , variety <i>occidentalis</i>	Common yarrow	VNS*	Native	0.5	32
<i>Artemisia ludoviciana</i>	White sage	VNS	Native	0.5	45
Shrubs					
<i>Atriplex canescens</i>	Fourwing saltbush	Wytana	Native	3.0	3.4
<i>Ericameria nauseosa</i>	Rubber rabbitbrush	VNS	Native	0.5	4.6
Total				26.5	188

[†]Seeding rate is for broadcast seed and presented as pounds of pure live seed per acre (lbs PLS/acre).

[‡]Introduced refers to species that have been 'introduced' from another geographic region, typically outside of North America. Also referred to as 'exotic' species. *VNS=Variety Not Specified and seed source will be from sites that are climatically similar to White Mesa.

Seed shall be purchased as pounds of pure live seed and will be certified by the Utah State Department of Agriculture and Food. Certification will verify that the seed is correctly identified and genetically pure. Once the seed is obtained, seed labels will be checked to determine the percent PLS and the date that the seed was tested for percent purity and percent germination. If the test date is greater than 6 months old, the seed will be tested again before being accepted.

9.2.3 Erosion Control Materials

Wood fiber mulch will consist of specially prepared wood fibers and will not be produced from recycled material such as sawdust, paper, cardboard, or residue from pulp and paper plants. The fibers will be dyed an appropriate color, with non-toxic, water-soluble dye to facilitate visual metering during application. Wood-fiber mulch will be supplied in packages and each package will be marked by the manufacturer to show the air-dry weight.

A tackifier will be used with the wood-fiber mulch to improve adhesion. The tackifier will be a biodegradable organic formulation processed specifically for the adhesive binding of mulch. In addition, the tackifier will uniformly disperse when mixed with water and will not be detrimental to the homogeneous properties of the mulch slurry.

9.3 Work Description

Revegetation efforts shall be directed at all reclaimed and disturbed areas. The goal of the revegetation plan is to ensure that a self-sustaining vegetative community is established.

9.4 Soil Amendment Application

Following final placement and grading of the frost barrier layer, amendments will be applied as discussed in Section 9.2.1. Inorganic sources of nitrogen, phosphorus, and potassium will not be applied to the soil because composted biosolids will provide all the macronutrients required for long-term sustainability.

9.5 Growth Zone Preparation

A favorable seedbed shall be prepared on the topsoil layer or topsoil-rock mixture, prior to seeding operations. The soil should be loose and friable so as to maximize contact with the seed. The soil will be tilled, following site contours with a disc or harrow (or similar approved equipment) to a maximum depth of 6 inches. The depth of valleys and the height of ridges caused by the final tillage operations are not to exceed 3 inches.

9.6 Seed Application

Seeding will follow the application of soil amendments and seedbed preparation, by broadcast spreading method. This procedure will use a centrifugal type broadcaster (or similar implement), also called an end gate seeder. The broadcasters will have a minimum effective spreading width of 20 feet. Seed will be applied in two separate passes. One-half of the seed will be spread in one direction and the other half of seed will be spread in a perpendicular direction. This will ensure that seed distribution across the site is highly uniform and also provide the opportunity to adjust the seeding rate if the specified rate is not being achieved. Seeding will not occur if wind speeds exceed 10 mph.

Immediately following seeding, the area will be lightly harrowed to provide seed coverage and to maximize seed-soil contact. Broadcast seed shall be harrowed into the soil to a depth of 0.25 to 0.75 inches.

Seeding will take place as soon as practical after the cover system is in place. Successful seeding in southeastern Utah can occur either in late fall (e.g. October) as a dormant seeding, with germination and establishment occurring the following spring or can be conducted in June, prior to the summer monsoon season. Timing for seeding will depend upon the construction schedule for the cover system.

9.7 Erosion Control Material Application

Mulch will be applied immediately following seeding. A weed-free, wood-fiber mulch shall be applied to the seeded area at a minimum rate of 1.5 tons/acre. The wood-fiber mulch will be applied by means of hydraulic equipment that utilizes water as the carrying agent. A continuous agitator action, that keeps the mulching material and approved additives in uniform suspension, will be maintained throughout the distribution cycle.

The pump pressure will be capable of maintaining a continuous non-fluctuating stream of slurry. The slurry distribution lines will be large enough to prevent stoppage and the discharge line will be equipped with a set of hydraulic spray nozzles that will provide even distribution of the mulch

slurry to the seedbed. Mulching will not be done in the presence of free surface water resulting from rains, melting snow, or other causes. Tackifier may be added either during the manufacturing of the mulch or incorporated during mulch application.

9.8 Performance Standard and Testing

The following section describes performance-based criteria for successful revegetation.

9.8.1 Seeding Rates

Prior to seeding, a known area will be covered with a tarp and seed will be distributed using the broadcaster and simulating conditions that would exist under actual seeding conditions. Seed will then be collected and weighed to determine actual seeding rate in terms of pounds per acre. This process will be repeated until the specified seeding rate is obtained.

During the seeding process, the seeding rate will be verified at least once by comparing pounds of seed applied to the size of the area seeded.

9.8.2 Erosion Control

The cover shall be inspected two times per year for eroded areas. Any area that has experienced erosion shall be backfilled and reseeded. Erosion control materials shall also be reapplied over reseeded areas.

9.8.3 Weed Control

Weed management would be conducted on the Mill site by identifying the presence of any noxious weeds during annual vegetation surveys and developing a weed control plan that is specific to the species that are present (Table 9.2). Noxious weed control is species-dependent and both method and timing will vary from species to species.

Table 9.2. Noxious weed species.

Scientific Name	Common Name
Utah State—Listed Noxious Weeds	
<i>Acroptilon repens</i>	Russian knapweed
<i>Cardaria spp.</i>	Whitetop (all species)
<i>Carduus nutans</i>	Musk thistle
<i>Centaurea diffusa</i>	Diffuse knapweed
<i>Centaurea solstitialis</i>	Yellow star thistle
<i>Centaurea stoebe ssp. micranthos</i>	Spotted knapweed
<i>Centaurea virgate ssp. Squarrosa</i>	Squarrose knapweed
<i>Cirsium arvense</i>	Canada thistle
<i>Convolvulus spp.</i>	Bindweed (all species)
<i>Cynodon dactylon</i>	Bermuda grass
<i>Elymus repens</i>	Quackgrass
<i>Euphorbia esula</i>	Leafy spurge
<i>Isatis tinctoria</i>	Dyer's woad
<i>Lepidium latifolium</i>	Broadleaf pepperweed
<i>Lythrum salicaria</i>	Purple loosestrife
<i>Onopordum acanthium</i>	Scotch thistle
<i>Sorghum almum</i>	Perennial sorghum (all species)
<i>Taeniatherum caput-medusae</i>	Medusahead
San Juan County—Listed Noxious Weeds	
<i>Aegilops cylindrical</i>	Jointed goatgrass
<i>Alhagi maurorum</i>	Camelthorn
<i>Asclepias subverticillata</i>	Western whorled milkweed
<i>Solanum elaeagnifolium</i>	Silverleaf nightshade
<i>Solanum rostratum</i>	Buffalobur

Each survey will identify noxious weed populations and locate these populations on a map using a set of symbols to identify species, size of the infestation, and density of the population. The effectiveness of control methods will be documented in each annual survey. In addition, immediately adjacent off-site properties will be visually surveyed to a distance of 100 feet. Inspections will be conducted by personnel familiar with the identification of noxious weeds in the area and based on Utah's Noxious Weed List.

The selected control methods will be based on the type, size, and location of the mapped noxious weeds. The treated area(s) will be monitored and re-inspected annually for new weed introductions and to evaluate the success of the control methods. Prevention is the highest priority weed management practice on non-infested lands; therefore protecting weed-free plant communities is the most economical and efficient land management practice. Prevention is best accomplished by ensuring that new weed species seed or vegetative reproductive plant parts of weeds are not introduced into new areas, and by early detection of any new weed species before they begin to spread.

Control methods may include chemical or mechanical approaches. The optimum method or methods for weed management vary depending on a number of site-specific variables such as associated vegetation, weed type, stage of growth, and severity of the weed infestation.

Chemical Control

Chemical control consists mostly of selective and non-selective herbicides. Considerations for chemical controls include: herbicide selection, timing of application, target weed, desirable plant species being grown or that will be planted, number of applications per year and number of years a particular species will need to be treated for desired control. Also important are the health and safety factors involved, and the need to consider undesirable impacts. The use of herbicides will be in compliance with all Federal and State laws on proper use, storage, and disposal. The chemical application will be done by a licensed contractor in accordance with all applicable laws and regulations and all label instructions will be strictly followed. Applications of herbicides would not be permitted when the instructions on the herbicide label indicate conditions that are not optimal.

Mechanical Control

Mechanical control is the physical removal of weeds from the soil and includes tilling, mowing, and pulling undesirable plant species. Tillage is most effective prior to seeding and establishment of desirable vegetation. The tillage method of weed control can be effective in eliminating noxious perennial weeds when repeated at short intervals (every 1-2 weeks) throughout the growing season. Tillage has the drawback of indiscriminately impacting all vegetation interspersed with weeds in established areas and can eliminate competitive, desirable vegetation leaving behind a prime seedbed for weeds to reinvade. Mowing can be an effective method for controlling the spread of an infestation and preventing the formation and dispersal of seeds. Mowing is most effective on weeds which spread solely or primarily by seed. In order to achieve this, it must be repeated at least twice during the growing season prior to, or shortly after bloom. Also, even the most intense mowing treatment will not kill hardy perennial weeds. Additional considerations will be made when selecting control treatments when specific situations arise regarding type, size, and location of weed infestations. Examples of this are perennial versus biennial, broadleaf versus grasses, noxious weeds interspersed with desirable vegetation, large monoculture patches, or small patches requiring spot treatment.

Treatment windows schedules, based on the control methods chosen and the noxious weeds present, will be established for each treatment area. The best time to treat perennial noxious weeds is in the spring or fall during their active growth phase. Different species will have different optimum treatment times even with the same type of control. Perennial weeds usually grow vegetatively in the spring, flower and seed in late spring and early summer, enter dormancy during the summer and actively grow again in the fall. The treatment windows selected will depend on the species present and control methods selected.

The final preparatory step is to determine the priority for areas to be treated. Prioritization ensures that the most important areas are dealt with at the most effective times. Important areas of concern include areas that may transport weed seeds. These areas include ditches, roadsides,

and land equipment storage sites. Large monoculture patches are of concern wherever they occur and would always be high priority. Also, small patches of weeds would be treated to prevent expansion of weed populations.

Once the treatment plan is implemented, detailed records will be kept, and success or failure of treatment will be recorded so as to eliminate unsuccessful treatments.

9.8.4 Vegetation Establishment Performance

The following Revegetation Acceptance Goals/Criteria have been adapted from the Monticello Site and would be used at the Mill Site to determine reclamation success.

Revegetation Acceptance Goal/Criteria:

Criterion 1 Species Composition

- a. The vegetative cover (the percentage of ground surface covered by live plants) shall be composed of a minimum of five perennial grass species (at least four listed as native), and one perennial forb species, and two shrub species listed in Table 9.1

Criterion 2 Vegetative Cover

- a. Attain a minimum vegetative cover percentage of 40 percent.
- b. Individual grass and forb species listed in Table 9.1 that are used to achieve the cover criteria shall have a minimum relative cover (the cover of a plant species expressed as a percentage of total vegetative cover) of 4 percent and a maximum relative cover of 40 percent.
- c. Individual species not listed in Table 9.1 may be accepted as part of the cover criteria if it is demonstrated that the species is native or adapted to the area and is a desirable component of the reclaimed project site.
- d. Species not listed in Table 9.1, including annual weeds or other undesirable species such as those listed in Table 9.2, shall not count toward the minimum vegetative cover requirement. Every attempt should be made to minimize establishment of all non-noxious weeds.

- e. Reclaimed areas shall be free of state- and county-listed noxious weeds (Table 9.2).
- f. The vegetative cover shall be self-regenerating and permanent. Self-regeneration shall be demonstrated by evidence of reproduction, such as tillers and seed production.

Criterion 3 Shrub Density

- a. A minimum shrub density of 500 stems per acre.
- b. Shrubs shall be healthy and have survived at least two complete growing seasons before being evaluated against success criteria

Plant cover would be measured annually on the tailing cells for a minimum of ten years or until the revegetation goals stated above are achieved. Cover would be measured by the point method, using a vegetation sighting scope mounted on an adjustable tripod with a level. Cover would be measured for each species encountered, as well as litter, rock, and bareground. Cover measurements would be made along a minimum of ten randomly placed transects on each tailing cell that are 100 feet long. A total of 100 points would be sited at one-foot intervals along each transect to collect cover data in the categories of live vegetation, litter, rock, and bareground. Sample adequacy would be determined for each tailing cell using the following formula that identifies the minimum number of samples that are necessary to estimate the population mean at a 90 percent level of confidence. Total live vegetation cover would be used to calculate sample adequacy.

$$n = \frac{t^2 s^2}{(.10x)^2}$$

Where: n = minimum number of samples required to meet sample adequacy requirements

s^2 = variance

$t^2 = 1.64$ for 90% confidence

\bar{x} = sample mean

Shrub density would be measured in belt transects placed on either side of the cover transects. All shrubs would be counted within a three-foot wide strip or belt transect along each side of the transect used for point cover measurements, resulting in a belt transect that is six-feet wide and 100 feet long.

In addition to the above cover sampling, annual observations would be made of overall plant community health and sustainability. Overall health would be based on plant vigor, presence of annual weeds, and signs of plant deficiencies or toxicities. Plant community sustainability would be based on observations of reproduction, including both vegetative reproduction, such as tillering, and seed production.

If revegetated areas are not making satisfactory progress in meeting revegetation goals outlined above, then remedial actions will be implemented as needed. These actions may include fertilization/soil amendments, reseeding, weed control, and/or erosion control depending upon the cause of the problem that may exist and the best remediation approach to ensure plant community success.

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Exhibit A-1: Daily QA/QC Checks

1.0 INTRODUCTION

A background count rate and reliability check using a check source shall be performed daily, prior to use, when the detector/scaler is used for counting. Background count rates and source checks shall be input on a control chart after developing of the mean and standard deviation (sigma) as discussed below.

2.0 QC CONTROL CHARTING

Select a background location such as an office or other location where background gamma radiation gamma values are not expected to vary. Take ten 30-second count readings and record them on Form 1. Using the ten readings, calculate the mean, sigma, and 2 sigma). These results should also be recorded on Form 1.

Daily, prior to use, and at the end of surveys, perform a 30-second background and source count at the same location and in the same configuration as the acceptable ranges were developed. If the background or source check result exceeds a difference of two standard deviations, (2s or 2 sigma) from the mean, as shown on Figure 2, the Instrument Control Chart, re-count the background or source, log the results, and enter the new data on the Instrument Control Chart. Two successive background or source check counts outside the 2s Instrument Control Chart range indicates possible problems with the detector/electronics.

Values between $\pm 2s$ of the mean net counts generally indicate normal operation of the instrument. Values outside the mean $\pm 2s$ will occur with a frequency of less than 5 percent. Values greater than 3s from the mean will occur with a frequency of less than one percent and should be investigated. Two consecutive measurements outside 3s indicate problems with equipment and require adjustments and/or repairs as necessary. The scaler shall be removed from service and immediate notification shall be made to the RSO or designee prior to counting any samples.

Calibrations shall be checked whenever a significant change or repair is made to the measurement system, or when changes are detected as a result of check source measurements.

Control charts shall be maintained to indicate instrument operability and/or malfunction problems on a daily basis when instruments are in use. Use the attached control chart. Control charts should be kept for both background counts and counts with a check source, such as a 5 μCi Cs-137 source.

FORM 1: CALCULATION OF INSTRUMENT STANDARD DEVIATION

Date of 1st Instrument Use	Count 1	Count 2	Count 3	Count 4	Count 5	Count 6	Count 7
	Count 8	Count 9	Count 10	Sample Mean (λ)	Sample Standard Deviation (σ)	Lower Control Limit ($\lambda-2s$)	Upper Control Limit ($\lambda+2s$)

$$\lambda = \frac{1}{10} \sum_{i=1}^{10} n_i$$

Where λ is the mean of the counts, and n is the 30 second count rate

$$s = \sqrt{\frac{\sum_{i=1}^m (n_i - \lambda)^2}{9}}$$

Where σ is the standard deviation, λ is the mean of the counts, and n is the 30 second count rate

FORM 2: INSTRUMENT CONTROL CHART

[illegible]

ATTACHMENT C.2

**REVISED CONSTRUCTION QUALITY ASSURANCE/ QUALITY CONTROL PLAN TO
ATTACHMENT B OF RECLAMATION PLAN, REVISION 5.0**

CONSTRUCTION QUALITY ASSURANCE/QUALITY CONTROL PLAN
FOR RECLAMATION OF WHITE MESA MILL FACILITY
BLANDING, UTAH

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1 INTRODUCTION

This Construction Quality Assurance/Quality Control Plan (CQA/QC Plan) has been prepared for construction activities related to the reclamation of the Energy Fuels Resources (USA) Inc. ("EFRI") White Mesa Mill Facility located in Blanding, Utah and is submitted as an attachment to the Reclamation Plan.

1.1 Purpose and Scope

The purpose of this CQA/QC Plan is to address the Construction Quality Assurance (CQA) and Construction Quality Control (CQC) procedures and requirements to be used during reclamation activities at the site to assure that the project is constructed in conformance with the Technical Specifications, Drawings, and applicable regulatory requirements and permit conditions. The CQA/QC Plan is intended to: 1) define individuals and organizations who will be involved in reclamation activities and their respective responsibilities and qualifications; 2) establish guidelines for the flow of information and project communication; 3) establish protocols for project documentation; and 4) establish specific CQA/CQC procedures for the major components of the project.

This CQA/QC Plan addresses reclamation of the following facilities:

- Cell 1 (evaporation)
- Cells 2, 3, 4A and 4B (tailings)
- Mill buildings and equipment
- On-site contaminated areas
- Off-site contaminated areas (i.e., potential areas affected by windblown tailings)

Reclamation of the above facilities will include the following:

- Placement of contaminated soils, crystals, and synthetic liner material and any contaminated underlying soils from Cell 1 into the last active tailings cell
- Placement of a compacted clay liner on a portion of the Cell 1 impoundment areas to be used for disposal of contaminated materials and debris from the Mill site

- Decommissioning the Cell 1 (evaporation) area
- Reclamation of the Mill and ancillary areas
- Placement of materials and debris from Mill decommissioning into the Cell 1 Disposal Area or the last active tailings cell
- Placement of an Evapotranspiration (ET) cover over the entire area of Cells 2, 3, 4A, 4B and the Cell 1 Disposal Area
- Construction of runoff control and diversion channels as necessary
- Reclamation of borrow sources

1.2 Definition of Terms

In the context of this CQA/QC Plan, the following definitions apply:

Construction Quality Assurance (CQA) – A planned and systematic pattern of means and actions designed to assure adequate confidence that the materials or services meet contractual and regulatory requirements and will perform satisfactorily in service. CQA refers to means and actions employed by the involved parties to assure conformity of the project work with this CQA/QC Plan, the Drawings, and the Technical Specifications.

Construction Quality Control (CQC) – Actions that provide a means to measure and regulate the characteristics of an item or service in relation to contractual and regulatory requirements. CQC refers to those actions taken by the Contractor, technicians, or other involved parties to verify that the materials and the workmanship meet the requirements of this CQA/QC Plan, the Drawings, and the Technical Specifications.

Technical Specifications – The document that prescribes requirements and standards for specific elements of the reclamation. This document is included as Attachment A to the 2011 Reclamation Plan. Technical Specifications will be prepared in final form prior to commencement of reclamation activities.

Drawings – Detailed project drawings to be used in conjunction with the Technical Specifications. These drawings will be prepared in final form as construction drawings prior to reclamation.

Construction Project – The total authorized/approved reclamation project that requires several construction segments to complete.

Construction Segment – A portion of the total construction project involving a specific area or type of work. Several construction segments will likely take place simultaneously during reclamation.

Construction Task – A basic construction feature of a construction segment involving a specific construction activity.

ASTM Standards – The latest versions of the American Society for Testing and Materials specifications, procedures and methods.

2 INVOLVED PARTIES AND PERSONNEL

Each construction task within each segment of the overall project will consist of both a QC and QA component. Compliance reporting will be completed for each segment. Upon completion of all project segments, a final construction report will be prepared for the project. Following is a listing of the parties (organizations and individuals) that will be involved in the implementation of the CQA/QC Plan during the reclamation at the site, including a discussion of each party's responsibility, authority and qualifications.

2.1 Owner

The Owner of this project is EFRI.

2.2 Construction Manager

Responsibility & Authority: The on-site Construction Manager is responsible for the conduct, direction and supervision of all reclamation activities as detailed in the Drawings and Technical Specifications. The Construction Manager will be selected/appointed by the Owner. The Construction Manager is responsible for maintaining a detailed schedule for the various Construction Segments so that each is performed according to the schedule for the overall Reclamation Project. The Construction Manager will interact as required with all other parties involved in implementing the reclamation including the Contractor, the CQA/QC personnel, and the DWMRC Project Manager. In the temporary absence of the Construction Manager, a designated representative will assume the duties of the Construction Manager. The Owner may appoint separate Construction Managers to oversee the various Construction Segments within the overall Reclamation Project. The Construction Manager(s) will report directly to the Owner.

Qualifications: The Construction Manager(s) shall have the mine reclamation and construction experience necessary to manage a large-scale reclamation project.

2.3 Design Engineer

Responsibility & Authority: The Design Engineer is responsible for the design of the various elements of the reclamation project and for preparing the Drawings and Technical Specifications. Throughout the project, the Design Engineer will interact as necessary with the Owner,

Construction Manager, CQA/QC staff, and the DWMRC Project Manager. The Design Engineer will approve all design changes that arise during the course of the Reclamation Project.

Qualifications: The Design Engineer shall be a qualified Professional Engineer registered in the State of Utah. The Design Engineer shall have expertise which demonstrates significant familiarity with the design and construction of the various elements of mine and mill site reclamation including earthwork, cover design, mill demolition and disposal.

2.4 Contractor

Responsibility & Authority: The Contractor refers to an independent party or parties, contracted by the Owner, performing the work in accordance with this CQA/QC Plan, the Drawings, and the Technical Specifications. It is anticipated that various Contractors will be employed to perform the various Construction Segments within the overall Reclamation Project. The Contractor will work under the direction of and report directly to the Construction Manager.

Qualifications: Qualifications of the Contractor are specific to the construction contract and the specific Construction Segment. The Contractor shall have a demonstrated history of successful construction experience as appropriate for the Construction Segment. The Contractor shall maintain current state and federal licenses as appropriate.

2.5 Surveyor

Responsibility & Authority: The Surveyor is a party, independent from the Owner or Contractor, who is responsible for surveying, documenting, and verifying the location of all significant components of the work. The Surveyor is responsible for issuing Record Drawings of the completed elements of the Construction Project. The Surveyor's work is coordinated with the Contractor and CQA Consultant. The Surveyor will report directly to the Construction Manager.

Qualifications: The Surveyor will be a well-established surveying company with at least 3 years of surveying experience in the State of Utah. All survey activities shall be performed under the direction of a Professional Land Surveyor, licensed as required by State of Utah regulations. The Surveyor shall be fully equipped and experienced in the use of total stations and the most recent version of AutoCAD.

2.6 CQA/QC Consultant

Responsibility & Authority: The CQA/QC Consultant is a party, independent from the Owner or Contractor, who is responsible for observing, testing, and documenting the various activities comprising the Reclamation Project in accordance with this CQA/QC Plan, the Technical Specifications and the Drawings. The CQA/QC Consultant will be responsible for issuing a CQA report at the completion of the Reclamation Project which will document construction and associated CQA/QC activities. The CQA/QC Consultant will work in coordination with the Contractor, Surveyor and other parties and will report directly to the Construction Manager.

Qualifications: The CQA Consultant shall be a well-established firm specializing in geotechnical and reclamation engineering that possesses the equipment, personnel, and licenses necessary to conduct the observation and testing required. The CQA/QC Consultant will be experienced with earthwork, mill decommissioning, and other reclamation activities. The CQA/QC Consultant will be experienced in preparation of CQA documentation including field documentation, field testing procedures, laboratory testing procedures, and CQA reports.

The CQA Consultant will provide qualified staff for the project which will include the following individuals.

- 1) CQA Officer
- 2) CQA Site Manager
- 3) QC Technicians

2.7 CQA Officer

Responsibility & Authority: The CQA Officer will be responsible for overall implementation and management of the CQA/QC Plan for the reclamation project. The CQA Officer works from the office of the CQA Consultant and conducts periodic visits to the site as required. The CQA Officer will supervise the CQA Site Manager and all QC Technicians and will coordinate with the Surveyor, the Contractor and other staff. The CQA Officer will report directly to the Construction Manager.

The CQA Officer will be expected to maintain a thorough understanding of the existing White Mesa facilities and the reclamation project design documents including the Drawings, Technical

Specifications, and this CQA/QC Plan. He/she will have the authority to reject work or material, to require removal or placement, to specify and require appropriate corrective actions if it is determined that the Quality Control/Quality Assurance, personnel, instructions, controls, tests, records are not conforming to the CQA/QC Plan, the Construction Plans, or the Technical Specifications. The approval of the CQA Officer is required on all Compliance Reports required in this CQA/QC Plan. Specific responsibilities of the CQA Officer will include the following:

1. Administer the CQA program (i.e., provide supervision of and manage all CQA personnel and activities)
2. Provide and document all necessary training and certifications for CQA personnel
3. Review and approve the Contractor's QC Plan(s), if applicable
4. Attend Project Kickoff and Pre-Construction Meetings, and make site visits as needed
5. Perform ongoing, timely review of all CQA documentation and provide signature on all CQA documentation

Qualifications: The CQA Officer will be a Professional Engineer registered in the State of Utah and will be experienced in providing CQA oversight for large construction projects.

2.8 CQA Site Manager

Responsibility & Authority: The CQA Site Manager will be appointed by the CQA Consultant to provide day-to-day, on-site oversight of the CQA/CQC activities. The CQA Site Manager will report directly to the CQA Officer and will interact with the Construction Manager, Contractor and others on a daily basis, as project activities take place. The CQA Site Manager will maintain a thorough understanding of the Drawings, Technical Specifications, and this CQA/QC Plan. Specific responsibilities of the CQA Site Manager will include the following:

1. Attend all CQA-related meetings including Project Kickoff and Pre-Construction Meetings
2. Provide direct oversight of QC Technicians
3. Assign locations for testing and sampling
4. Oversee the collection and shipping of laboratory test samples

5. Review results of field and laboratory testing and any test results provided by the Contractor and make appropriate recommendations
6. Review the calibration and condition of onsite testing equipment, and maintain necessary equipment documentation
7. Report any deviations from the CQA/QC Plan, Drawings, or Technical Specifications to the Construction Manager and CQA Officer and arrange consultation with other parties as necessary to find solutions to unsolved problems
8. Prepare a daily field report for submittal to the CQA Officer and Construction Manager

Qualifications: The CQA Site Manager will be an engineer experienced in providing field CQA/CQC oversight for construction projects.

2.9 QC Technicians

Responsibility & Authority: The CQA Consultant will utilize various QC Technicians to assist the on-site CQA Site Manager to perform specific tasks through the project to verify the adequacy of construction materials and procedures. The QC Technicians will work under the direct supervision of the CQA Site Manager and will work in close coordination with the Contractor. The number of technicians will depend on the project needs as the work progresses.

Qualifications: The CQA Consultant will identify areas of competency and select technicians as necessary. The QC Technicians will receive on-the-job training or off-site training as required under the direction of the CQA Consultant. The CQA Officer will determine the areas of expertise of the respective technician and maintain a file on each technician's training and certifications.

2.10 Document Control Officer

Responsibility & Authority: The Document Control Officer will be appointed by the Construction Manager to assist with managing the various documents that will be produced throughout the project. The Document Control Officer will maintain permanent files for the Construction Project. All tests, surveys, monitoring and report originals will be maintained in the project files. The Document Control Officer will oversee document reproduction and

distribution. A distribution list will be prepared in coordination with the Owner, Construction Manager, and CQA Officer.

Qualifications: The Document Control Officer will have the organizational and computer skills necessary to manage and distribute the various project documents.

2.11 CQA Laboratory

Responsibility & Authority: The CQA Laboratory is a party, independent from the Owner and Contractor, responsible for conducting tests of soils and other project materials in accordance with ASTM and other applicable standards in either an on-site or off-site laboratory. It is likely that more than one CQA Laboratory will be used to perform testing during reclamation activities, depending upon the material being tested. The CQA Laboratory will work in coordination with other personnel and will report directly to the CQA Consultant.

Qualifications: The CQA Laboratory will be an AASHTO AMRL accredited laboratory in testing soils using the ASTM standards outlined in the Technical Specifications. The CQA Laboratory will be capable of providing test results within a maximum of seven days of receipt of samples and will maintain that capability throughout the duration of the project.

2.12 DWMRC Project Manager

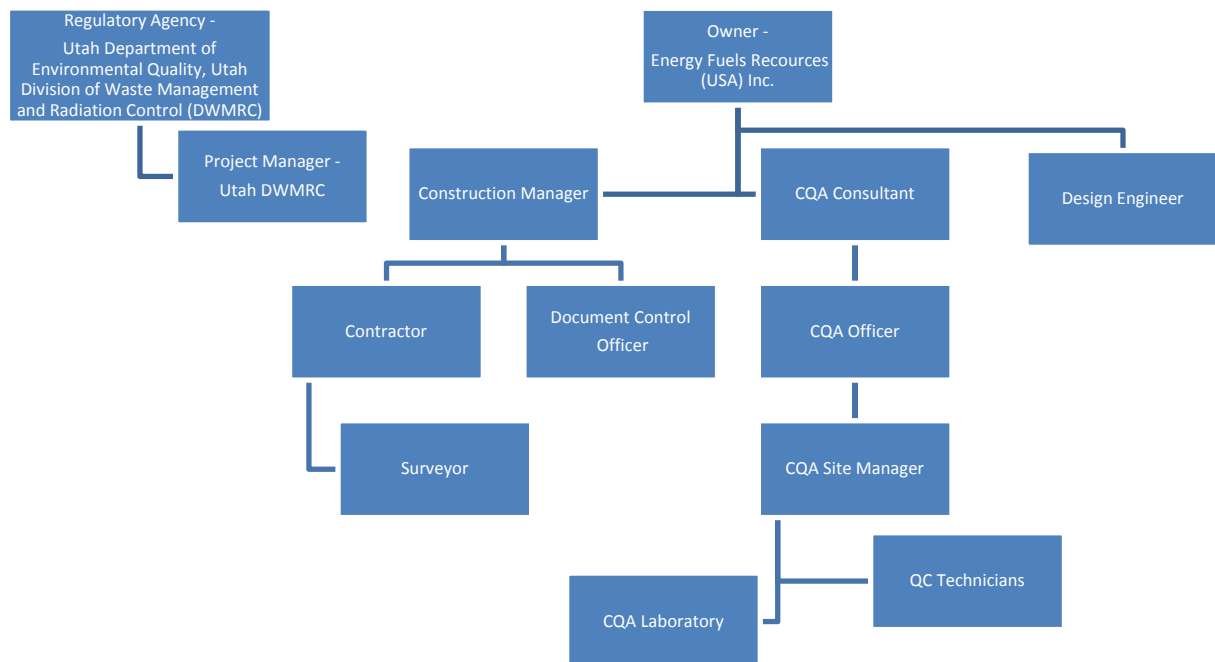
The DWMRC Project Manager will represent the DWMRC's interests in the Reclamation Project. The DWMRC Project Manager may choose to review selected procedures, personnel qualifications, equipment, calculations, and documentation. DWMRC personnel will be granted full access to the project files upon request.

3 PROJECT COMMUNICATION

3.1 Flow of Information

Effective communication is necessary to ensure a high degree of quality during the Reclamation Project. Specific meetings of key project personnel will take place including a Project Kickoff Meeting, Pre-Construction Meetings, weekly Progress Meetings, and Problem or Work Deficiency Meetings. In addition, informal communication and cooperation will take place between the various parties listed in Section 2 above. The organizational chart showing the proposed lines of communication between the various parties is shown in Figure 1. The planned project meetings are described in the following sections.

Figure 1 – Project Organization



3.2 Project Kickoff Meeting

At the beginning of major reclamation activities, a Project Kickoff Meeting will take place at the site. At a minimum, this meeting will be attended by the Owner, the Construction Manager, the Contractors, the CQA Consultant, the Engineer, and the DWMRC Project Manager. The Construction Manager will conduct a site tour to observe the current site conditions and to identify various areas of the site including equipment storage areas, soil stockpiling areas, and staging areas. The Construction Manager will appoint an individual to record the discussions and decisions of the meeting and distribute meeting minutes to all attendees. Specific items for discussion will include:

1. The Drawings, Technical Specifications, and CQA/QC Plan and any modifications or clarifications to these documents
2. Lines of communication and authority
3. The responsibilities of each party
4. The overall schedule for the Reclamation Project and the anticipated sequencing and schedule of the various Construction Segments
5. Documentation requirements

3.3 Pre-Construction Meetings

The overall Reclamation Project will be comprised of several individual Construction Segments. At the beginning of each Construction Segment, a Pre-Construction meeting will take place at the site and will be attended by the Construction Manager, the Contractor, the CQA Consultant, and the DWMRC Project Manager. The Construction Manager will conduct a tour of the work area to observe the current site conditions and to identify various areas of the site including equipment storage areas, soil stockpiling areas, staging areas, and other details related to the Construction Segment. The Construction Manager will appoint an individual to record the discussions and decisions of the meeting and distribute meeting minutes to all attendees. Specific items for discussion at the Pre-Construction Meetings include the following:

1. The Drawings, Technical Specifications, and CQA/QC Plan and any modifications or clarifications to these documents

2. Safety procedures
3. Lines of communication and authority
4. The responsibilities of each party
5. The overall schedule for the Construction Segment
6. Acceptance and rejection criteria
7. Protocols for handling deficiencies, repairs, and re-testing
8. Documentation requirements

3.4 Progress Meetings

Progress meetings will be held weekly between the CQA Site Manager, the Contractor, the Construction Manager, and other concerned parties participating in the construction of the project. This meeting will include discussions of the progress of the project, planned activities for the next week, and revisions to the work plan or schedule. The Construction Manager will appoint an individual to document the meeting and send meeting minutes to all attendees for review and comment.

3.5 Problem or Work Deficiency Meetings

It is anticipated that most work deficiencies will be minor and can be resolved in the field by the QC Technicians, the CQA Site Manager, and the Contractor. The deficiency and resolution will be recorded in daily field reports and weekly summary reports prepared by the CQA Site Manager.

A special meeting will be held when a problem or deficiency is present, or likely to occur, that cannot be easily resolved in the field. The meeting will be attended by the Contractor, the Construction Manager, the CQA Site Manager, and other parties as appropriate. If the problem requires a design modification, the Engineer should either be present at, consulted prior to, or notified immediately upon conclusion of this meeting. The Construction Manager will appoint an individual to record the meeting and send meeting minutes to all attendees for review and approval. The purpose of the work deficiency meeting is to define and resolve the problem or work deficiency as follows:

1. Define and discuss the problem or deficiency
2. Review alternative solutions
3. Select a suitable solution agreeable to all parties
4. Implement an action plan to resolve the problem or deficiency

4 DOCUMENTATION

4.1 Overview

The CQA Consultant will be responsible to prepare documentation that demonstrates that CQA/CQC requirements have been addressed and satisfied. Documentation will include monitoring logs, testing data sheets, photo logs, equipment calibration forms, daily field reports, weekly summary reports, reports of design or specification changes, and a final CQA Report. Documentation will be maintained in the White Mesa Project files and will be available to the Owner, Engineer, CQA Officer, and the DWMRC Project Manager at all times.

The CQA Officer and Site Manager will be responsible for preparing forms required throughout the Reclamation Project. These forms will be used by QC Technicians and other parties to document QC activities.

4.2 Daily Field Reports

The CQA Site Manager will prepare daily field reports that will document each day's activities. These daily reports will include the following, as applicable:

1. Basic information including date, project name, weather conditions, and the applicable Construction Segment
2. A summary of construction locations, activities, and observations and QC activities performed
3. Equipment and personnel on the project and a summary of meetings and attendees
4. Monitoring logs, testing data sheets, photo logs, and equipment calibration forms
5. A description of materials used and result of testing and documentation
6. Laboratory test reports
7. Reports of construction problems and resolution data sheets
8. Identification of deficient work or materials, and results of re-testing of deficient work
9. The signature of the CQA Site Manager

4.3 Weekly Summary Reports

At the end of each work week, a weekly summary report will be prepared and submitted to the Construction Manager and the CQA Officer. Weekly summary reports will include a brief description of the week's activities and all of the week's daily field reports. The CQA Officer will be responsible to review and sign each weekly summary report.

4.4 Field Change Reports

Changes that do not alter the intent of the Construction Plans or Technical Specifications may be made during construction to fit field conditions. Field changes require the approval of the Construction Manager and the CQA Site Manager. Field changes are to be reported on Form No. F-25 (Included in Section 6.0).

4.5 Construction Problems and Resolution Data Sheets

If significant recurring nonconformance occurs, or if special construction situations arise, the Construction Manager and CQA Officer will be made aware of the situation. The cause of the nonconformance will be determined and appropriate changes in procedures or specifications may be recommended. A Construction Problems and Resolution Data Sheet will be prepared to describe the situation and the resolution. Supporting documentation, such as photos or testing data sheets, will be attached to the data sheet. Data sheets will be included in the daily field reports and weekly summary reports.

4.6 Design or Specification Changes

During construction, design or specification changes may be required. Design changes will require the written approval of the Engineer and will take the form of technical memorandum and/or an addendum to the Drawings or Technical Specifications. Design changes are to be reported on Form No. F-26 (Included in Section 6.0).

4.7 CQA Compliance Reports

At the completion of each Construction Segment, the CQA Consultant will prepare a CQA Compliance Report signed and sealed by a Professional Engineer licensed in the State of Utah. The CQA Report will acknowledge that the work has been performed in conformance with the

Drawings and Technical Specifications. The CQA Report will incorporate supporting documentation including:

1. All daily field reports and weekly summary reports
2. Laboratory test reports
3. Field change reports
4. Construction problems and resolution data sheets
5. Documentation of design or specification changes

Any subsequent Construction Segment that is dependent upon successful completion of a specific Construction Segment cannot be initiated until a Compliance Report is prepared and approved for the previous dependent Construction Segment. Compliance Reports are to be completed on Form No. F-23 (Included in Section 6.0).

4.8 Final Construction Report

At the conclusion of the Reclamation Project, the Construction Manager or a designated representative will prepare a Final Construction Report. This report will be submitted to the DWMRC for review and approval within 180 calendar days after completion of construction. This report will be prepared under the direct supervision of and stamped by a Professional Engineer registered in the state of Utah. This report will include, at a minimum:

1. All of the individual CQA Compliance Reports which will summarize all CQA/CQC operations, construction equipment and processes, results, and observations of conformance/verification testing
2. A summary of any actions taken to resolve construction problems encountered
3. Field notes and photographs
4. As-built drawings and details

5 CQA/CQC PROCEDURES

This section describes the CQA/CQC monitoring and testing procedures to be used during the Reclamation Project to ensure that construction takes place in accordance with the Drawings and Technical Specifications. Specific requirements for construction procedures and materials are presented in the Drawings and Technical Specifications, along with criteria for site cleanup activities.

5.1 Contractor Evaluation

Prior to construction, each Contractor will submit a summary of proposed construction methods, equipment and testing protocols. The Construction Manager, CQA Officer, and Engineer will review the submittal and provide approval, in writing, of the Contractor's plans. The Contractor may be required to modify proposed methods, equipment, or testing protocols prior to approval.

5.2 Testing Methods

Throughout the Reclamation Project, various field and laboratory testing will be conducted to ensure that materials meet the Technical Specifications. Where applicable, testing will be conducted in accordance with the current versions of the corresponding ASTM test procedures. Any revisions to the testing methods will be reviewed and approved by the Engineer and the CQA Officer prior to usage. Testing methods to be used are summarized in Table 1. The required frequency of testing is described in the applicable Sections that follow.

Table 1 - Summary of Testing Methods

TEST METHOD	TEST STANDARD
Particle Size Analysis (Gradation)	ASTM D422
Atterberg Limits	ASTM D4318
Standard Proctor	ASTM D698
Rock Correction of Unit Weight & Water Content	ASTM D4718
Nuclear Moisture/Density Gauge	ASTM D6938
Sand-Cone Test	ASTM D1556
LA Abrasion – Coarse	ASTM C535

TEST METHOD	TEST STANDARD
LA Abrasion – Fine	ASTM C131
Specific Gravity – Aggregate	ASTM C127
Absorption – Aggregate	ASTM C127
Sodium Soundness – Aggregate	ASTM C88

During earthwork operations and fill placement, testing will be conducted to verify that the materials meet the gradation and classification specifications. Testing will include gradation testing (ASTM D422) and Atterberg Limit testing (ASTM D4318).

Moisture-density curves will be developed using the standard Proctor test (ASTM D698). Rock corrections (ASTM D4718) for the Proctor tests may be required depending on the material being tested. Field density testing may be conducted with the sand cone test (ASTM D1556) or a nuclear density gauge (ASTM D6938, or as modified by the QA Manager). Correlation of nuclear density gauge results shall be by comparison with results from sand cone test(s) and laboratory testing for water content(s) using the oven drying method (ASTM D2216) on similar material. A sufficient number of sand cone tests and moisture content tests will be performed to provide a correlation between the sand cone and nuclear density tests.

Rock protection aggregate will be tested using the LA Abrasion test for coarse or fine material (ASTM C535 or C131), the sodium soundness test (ASTM C88), and the specific gravity and absorption test (ASTM C127).

Other field or laboratory testing may be required throughout the Reclamation Project. Any testing shall be performed in accordance with the applicable ASTM or other industry standard.

5.3 Cell 1 Reclamation

Reclamation of Cell 1 will include the removal of contaminated materials including raffinate crystals, PVC liner, and contaminated site soils and the construction of a clay-lined area for permanent disposal of contaminated site materials. This disposal area (the Cell 1 Disposal Area)

will be constructed adjacent to and parallel with the existing Cell 1 dike. A sedimentation basin will then be constructed and a drainage channel provided.

5.3.1 Removal of Contaminated Materials

QC staff will monitor of the removal of raffinate crystals, liner, and contaminated soils from Cell 1 and placement in the designated area. QC procedures for the placement of these materials are described in Section 5.4.

5.3.2 Subgrade Preparation

Subgrade for the clay liner may be leveled and filled as needed to provide a stable base for the placement of the clay liner. The QC staff will monitor placement and compaction of any subgrade fill.

5.3.3 Clay-Lined Cell 1 Disposal Area

A clay lined area will be constructed adjacent to and parallel with the existing Cell 1 dike for permanent disposal of contaminated material and debris. Tailings will not be placed in the Cell 1 Disposal Area. The area will be lined with a 12-inch thick clay layer prior to placement of contaminated materials and installation of the final reclamation cap. Placement of clay liner materials will be based on a schedule determined by the availability of contaminated materials removed from the Mill decommissioning area in order to maintain optimum moisture content of the clay liner prior to placing of contaminated materials.

5.3.4 Clay Fill Conformance Monitoring and Testing

The CQA Contractor will perform monitoring and frequent verification testing to verify that the clay fill meets the gradation and classification specifications. The CQA Contractor will monitor earthmoving operations to ensure that fill material is taken from the proper borrow sources.

Clay liner material shall be minus 1-inch size, and shall be free from roots, branches, rubbish, and process area debris. Liner material shall have a minimum of 40 percent passing the No. 200 sieve and a minimum plasticity index (PI) of 15. Suitable soils will classify as CL, CH, or SC materials under the Unified Soil Classification System.

Gradation and classification testing will be performed at a minimum of one test per 1,000 cubic yards of clay liner material or when the material shows significant variation. Samples should be randomly selected for testing.

Laboratory test results for the clay liner shall be verified for compliance and approved by the CQA site manager prior to placement of disposed materials in the cell.

5.3.5 Clay Liner and Subgrade Material Placement

QC Technicians will observe the surface condition prior to fill placement. If the compacted surface of any layer of fill is too dry or smooth to bond properly with the layer of material to be placed thereon, it will be moistened and/or reworked with a harrow, scarifier, or other suitable equipment to a sufficient depth to provide relatively uniform moisture content and a satisfactory bonding surface before the next succeeding layer of earthfill is placed. If the compacted surface of any layer of earthfill in-place is too wet (due to precipitation) for proper compaction, it will be reworked with harrow, scarifier or other suitable equipment to dry out the layer and reduce the moisture content to within the required limits. It will then be recompacted to the earthfill requirements.

QC Technicians will monitor the weather and temperature conditions. No material will be placed when fill material or the underlying material is frozen or when ambient temperatures do not permit the placement or compaction of the materials to the specified density without developing frost lenses in the fill.

The QC Technicians will monitor lift thicknesses frequently to verify the specifications are being met. The required layer and lift thicknesses for the clay liner and subgrade fill are listed in Table 2.

Table 2 - Summary of Liner Component Layers and Lift Thicknesses

Liner Component	Material Type (USCS)	Layer Thickness	Lift Thickness
Subgrade Fill	CL, ML, SC, SP, or SM	Variable	8 in. loose (max.)
Clay Liner	CL, SC, or CH	12 in. (min.)	6 in. compacted (max.)

5.3.6 Moisture and Density Control

The QC Technicians will monitor placement, moisture conditioning, and compaction of the fill as it is placed. Prior to the start of field compaction operations, appropriate laboratory compaction curves will be obtained for the range of materials to be placed. Laboratory compaction curves based on complete Proctor tests will be obtained at the frequencies outlined in Table 3, depending on the variability of materials being placed.

Each layer of the fill will be conditioned so that the moisture content is uniform throughout the layer prior to and during compaction. As far as practicable, materials will be brought to the proper moisture content before placement. If necessary, water will be added after lift placement to the material by sprinkling on the layer. Each lift will be compacted by a sufficient number of roller passes or other compaction equipment to achieve the required dry density. Material that is too dry or too wet or does not meet the required dry density will be rejected and reworked until the moisture content and dry density are within the specified limits. Reworking may include removal, re-harrowing, reconditioning, rerolling, or combinations of these procedures.

The required density testing frequencies are included in Table 3. For all materials, a minimum of two tests will be taken for each day that an applicable amount of fill is placed in excess of 150 cubic yards. A minimum of one test per lift and at least one test for every full shift of compaction operations will be taken.

Field density testing may be conducted with the sand cone test (ASTM D1556) or a nuclear density gauge (ASTM D6938, or as modified by the QA Manager). Correlation of nuclear density gauge results shall be by comparison with results from sand cone test(s) and laboratory testing for water content(s) using the oven drying method (ASTM D2216) on similar material. A sufficient number of sand cone tests and moisture content tests will be performed to provide a correlation between the sand cone and nuclear density tests. Field density tests shall be compared with standard Proctor tests (ASTM D698 Method A or C) on the same material.

Testing frequency may be increased by the CQA Site Manager if variability of materials is noted at the site, during adverse conditions, or to isolate failing areas of the construction.

Field density testing should not jeopardize the integrity of the clay liner. Holes in the clay material resulting from testing should be repaired by hand by filling with clay fill, or by filling with bentonite powder which is hydrated to fully seal the hole.

**Table 3 - Summary of Liner Component Moisture-Density Testing
Frequencies and Requirements**

Liner Component	Test Frequency	Density Requirement*	Moisture Requirement*	Proctor Frequency
Subgrade Fill	1/1,000 cubic yards placed	90% (min.)	+/- 3%	1/5,000 cubic yards placed
Clay Liner	1/500 cubic yards placed	95% (min.)	+/- 2%	1/2,500 cubic yards placed

* Based on maximum dry density and optimum water contents as determined by standard Proctor tests (ASTM D698 Method A or C) on the same material.

5.3.7 Sedimentation Basin and Discharge Channel

After contaminated material is removed from Cell 1 and the Cell 1 Disposal Area clay liner has been constructed, Cell 1 will be breached and constructed as a sedimentation basin. A discharge channel out of the sedimentation basin will be constructed. Details of these features are provided in the Drawings and Technical Specifications. The QC staff will monitor the excavation and construction of these features to ensure conformance with the Technical Specifications.

The channel excavation will be located within competent bedrock. The CQA team must document and verify the competency of the sedimentary bedrock along the channel for the Engineer and the Owner's approval.

5.3.8 Riprap Conformance Monitoring and Testing

A rock apron will be constructed at the transition from soil to bedrock within the sedimentation basin. Rock apron riprap material of the specified size shall have a minimum rock quality designation or durability score of 70 or higher. If actual rock quality designation is between 65 and 69, oversizing will be required. Rock quality designations below 65 will not be acceptable.

The rock size specifications for the riprap shall be confirmed by particle-size distribution testing prior to placement, using ASTM D422, ASTM D5519, or an approved equivalent method for

large-sized material. Testing shall be at a frequency of at least one test per 10,000 cubic yards of riprap placed, per select size, or when riprap characteristics show significant variation.

Test series for rock durability will include specific gravity, absorption, sodium soundness and LA abrasion. During construction additional test series and gradations will be performed for each type of riprap when approximately one-third (1/3) and two-thirds (2/3) of the total volume of each type have been produced or delivered. For any type of rock where the volume is greater than 30,000 cubic yards, a test series and gradations will be performed for each additional 10,000 cubic yards of rock produced or delivered.

5.3.9 Material Placement

In subgrade areas requiring fill placement to achieve final grades, after liner removal, the upper 12 inches should be scarified, moisture conditioned and compacted prior to fill placement.

Riprap shall be placed in one or more lifts to form a continuous, uniform layer on top for the filter material layers with a minimum thickness of 12 inches (2 times the specified D_{50}). The top surface of the riprap shall be track-rolled or tamped with the bucket of a track-hoe to provide a uniform riprap surface and minimize void spaces within the riprap.

5.3.10 Tolerances

Completed grading for the sedimentation basin, in soil, shall be within 1.0 foot (horizontally) of the lines as designed, and within 0.1 foot (vertically) of the elevations as designed. Final surfaces shall be smoothed to avoid abrupt changes in surface grade or areas of runoff concentration.

The completed grading for the discharge channel (and portions of the sedimentation basin) in rock shall be within 2.0 foot (horizontally) of the lines as designed, and within 0.5 foot (vertically) of the elevations as designed. The final rock surfaces will be rough and should not be filled to make grade. The bedrock channel should be constructed at or below the design grades in order to meet the intent of the design.

5.3.11 Nonconformance, Corrective Action and Stop Work

The CQA staff, including the CQA Site Manager and QC Technicians, will have the authority to reject material brought to the site or material that has been placed. For a failed field

moisture/density test, the QC Technician will determine the extent and depth of the affected area and require the Contractor to re-work the material as described above. If persistent failed tests occur (indicating inadequate compaction methods), the CQA Site Manager will have the authority to stop the work until the underlying cause is determined and the Contractor can demonstrate that moisture/density specifications can be met.

Laboratory test results for the clay liner shall be verified for compliance and approved by the CQA site manager prior to placement of disposed materials in the cell.

5.3.12 Documentation

Field and laboratory test results, observations of fill placement, and field compaction test results will be recorded using the appropriate field forms and reports, as described in Section 4. Table 4 includes a summary of the required materials testing and frequencies.

Table 4 - Summary of Testing Frequency and Criteria for Clay Liner and Sedimentation Basin Riprap

Component	Test	ASTM Standard	Frequency	Criteria
Clay Liner	Gradation (200 Wash)	D422	1/2,500 cubic yards	40% min. passing the 200 sieve
	Atterberg Limits	D4318	1/2,500 cubic yards	Min. PI = 15
Riprap*	Gradation with 200 Wash	D422	1/10,000 cubic yards	D ₅₀ , Durability

*Rock durability testing per section 5.3.8

5.4 Mill Decommissioning

Decommissioning of the Mill will include:

- Disposal of the Mill processing equipment and structures and contaminated soils in the Mill area
- Cleanup of contaminated areas of the Mill Site including ore storage area and roadways
- Cleanup of windblown contamination

These areas are shown on the Drawings. The Technical Specifications describe methods and cleanup criteria, including radiological equipment that will be used and the development of cleanup criteria. Contaminated materials will be disposed of in the designated areas of the tailings impoundment.

The CQA Contractor will provide specialized QC Technicians qualified to monitor the dismantling of the Mill equipment and structures and the cleanup of contaminated soils. These Technicians will be trained in the proper use and calibration of radiological monitoring equipment and will monitor the work to ensure the cleanup criteria are met.

5.4.1 Characterization Surveys

Following scanning, classification and cleanup (as required), the areas will be scanned again to verify compliance with activity criteria. QC Technicians will use calibrated beta/gamma instruments capable of detecting activity levels of less than or equal to 25 percent of the guideline values.

After removal of contamination, the technicians will make final surveys over the remediated areas. The QC Technicians will document within the specific ten meter by ten meter grids, the sample point locations, as detailed in the Specifications. Soil samples from 10 percent of the surveyed grids will be chemically analyzed to confirm the initial correlation factors utilized and confirm the success of cleanup effort for radium, thorium and uranium. Ten percent of the samples chemically analyzed will be split and duplicates will be sent to an off-site laboratory. Spikes and blanks, equal to 10 percent of the samples that are chemically analyzed, will be processed with the samples.

5.4.2 Contaminated Material Disposal

Contaminated materials including mill debris, site soils, liner material, and raffinate crystals will be disposed of in the designated portion of the Cell 1 Disposal Area. Material specifications and placement methods are described in the Construction Plans and Technical Specifications. The CQA Contractor will provide full-time monitoring and testing during material placement.

5.4.3 Material Conformance Monitoring

For scrap and debris, the QC Technicians will monitor the volume and size of the material to ensure compliance with the maximum dimensions provided in the Technical Specifications (a maximum dimension of 20 feet and a maximum volume of 30 cubic ft) and to ensure that containers are properly pierced. If the size limits are exceeded, the QC staff will require the Contractor cut the material down to size.

5.4.4 Material Placement

QC Technicians will monitor material placement to verify the debris is spread out and placed according to the specifications and that voids are filled with stockpiled soils, contaminated soils, tailings and/or other approved materials. The approval of the Construction Manager and CQA Officer will be required for the use of other materials to fill voids.

A minimum of one foot of compacted soil will be required above the clay liner prior to placing any scrap or debris.

When liner or other lightweight material is placed, the QC staff will ensure that at least one foot of soil, crystals or other materials is placed above for protection against wind.

To the extent practicable, the various materials will not be concentrated in thick deposits on top of the tailings, but will be spread over the working surface as much as possible to provide relatively uniform settlement and consolidation characteristics of the cleanup materials.

It is anticipated that raffinate crystals will have a consistency similar to a granular material when brought to the cells, with large crystal masses being broken down for transport. Placement of the crystals will be performed as a granular fill, with care being taken to avoid nesting of large sized material. Actual placement procedures will be evaluated by the QC staff during construction as crystal materials are brought and placed in the cells.

Soil or soil-like material shall be placed and compacted over each lift of debris or other materials in lifts not to exceed two feet in loose thickness and compacted prior to placement of additional lifts.

5.4.5 Material Compaction

CQA staff will monitor material compaction to verify compliance with the specifications. The first lift (bridging lift) will be compacted by the tracking of heavy equipment, such as a Caterpillar D6 Dozer (or equivalent), using at least 4 passes, prior to the placement of a subsequent lift. Contaminated soils and other cleanup materials after the bridging lift will be compacted to the density requirement provided in the Technical Specifications. During construction, compaction requirements for the raffinate crystals will be re-evaluated based on field conditions and modified by the Construction Manager and CQA Officer, with the agreement of the DWMRC personnel.

Soil or similar material shall be compacted with a minimum of six passes with self-propelled, towed, or hand-held vibratory compaction equipment. The number of passes shall be confirmed with actual compaction equipment on site with a field test section of soil to establish a correlation between the field compaction method and 80 percent of maximum dry density for the soil, as determined by the standard Proctor test (ASTM D698). During compaction, the material shall be within 1 percent above to 4 percent below optimum moisture content for the material, as determined by the standard Proctor test.

The upper 12 inches of the final disposed material surface shall be compacted to 90 percent of the maximum dry density for the material, as determined by the standard Proctor test. During compaction, the material shall be within 1 percent above to 4 percent below optimum moisture content for the material, as determined by the standard Proctor test. If water addition is required to achieve this range of moisture contents, the added water shall be thoroughly mixed into the material prior to compaction.

Field density tests shall be compared with standard Proctor tests (ASTM D698 Method A or C) on the same material. Standard Proctor tests shall be conducted at a frequency of at least one test per 5,000 cubic yards of material compacted, or when material characteristics show significant variation.

Field density testing may be conducted with the sand cone test (ASTM D1556) or a nuclear density gauge (ASTM D6938, or as modified by the QA Manager). Correlation of nuclear density gauge results shall be by comparison with results from sand cone test(s) and laboratory testing for water content(s) using the oven drying method (ASTM D2216) on similar material. A sufficient number of sand cone tests and moisture content tests will be performed to provide a correlation between the sand cone and nuclear density tests.

The frequency of the field density and moisture tests will be not less than one test per 1,000 cubic yards of compacted fill. A minimum of two tests will be taken for each day that an applicable amount of fill is placed in excess of 150 cubic yards. A minimum of one test per lift and at least one test for every full shift of compaction operations will be taken. Tables 5 and 6 summarize the placement and testing criteria for the disposed materials.

Table 5 - Summary of Disposed Materials and Lift Thicknesses

Disposed Materials	Material Type (USCS)	Layer Thickness	Lift Thickness
Debris Lift	Variable	48 in. (max.)	As needed to fill voids
Fill Above Debris Lift	Variable	36 in. (min.)	12 in. compacted (max.)

**Table 6 - Summary of Disposed Materials Moisture-Density Testing
Frequencies and Requirements**

Disposed Materials	Test Frequency	Density Requirement *	Moisture Requirement *	Proctor Frequency
Fill around debris	1/1,000 cubic yards placed	80% (min.)	- 4% to +1	1/5,000 cubic yards placed
Upper Debris Fill	1/1,000 cubic yards placed	90% (min.)	- 4% to +1	1/5,000 cubic yards placed

* Based on maximum dry density and optimum water contents as determined by standard Proctor tests (ASTM D698 Method A or C) on the same material.

5.4.6 Final Slope and Grades

The final disposed material surface shall have maximum side slopes of 5:1 and a top surface sloping in the directions and grades shown on the Drawings. The side slopes and top surface shall be free from abrupt changes in grade or areas of runoff concentration. The final disposed material surface shall be compacted with approved construction equipment to form a smooth surface with uniform density for subsequent cover placement.

5.4.7 Tolerances

The final surface of the disposed material shall be smoothed to avoid abrupt changes in surface grade. The layer thicknesses shall meet the required minimum thicknesses.

5.4.8 Nonconformance, Corrective Action and Stop Work

The CQA Site Manager and QC Technicians will have the authority to reject scrap and debris that is not properly prepared for placement. The Contractor may be required to reduce the size of large pieces of material or pierce drums or other containers. CQ staff may also require site soils to be re-worked if a failed test indicates the compaction requirements were not met. If persistent inadequacies occur during the placement of contaminated materials, the CQA Site Manager will

have the authority to stop the work until the underlying cause is determined and the Contractor can demonstrate that the specifications can be met.

5.4.9 Documentation

All observations and monitoring of contaminated material placement and all field compaction test results will be recorded using the appropriate field forms and reports, as described in Section 4.

5.5 Settlement Plates

The CQA team will need to verify proper construction and placement of the settlement points. The Surveyor will conduct the settlement plate measurements based on the DWMRC approved monitoring plan.

5.6 Cover System

A multi-layered earthen cover will be placed over tailings Cells 2, 3, 4A, and 4B and the portion of Cell 1 used for disposal of contaminated materials (the Cell 1 Disposal Area). The cover layers, from bottom to top, will include: 1) platform fill, 2) high compacted layer 3) water storage layer, and 4) erosion protection layer. Layers 1 through 3 will consist of the same material type and are all identified as “random fill”. The material specifications, layer configurations, layer thicknesses, borrow sources, placement methods, and compaction requirements are described in the Technical Specifications. The CQA Contractor will provide full-time monitoring and testing during material placement.

5.6.1 Material Conformance Monitoring and Testing

The CQA Contractor will perform monitoring and frequent verification testing to ensure that the fill materials meet the gradation and classifications specifications. The CQA Consultant will monitor earthmoving operations to ensure that the fill material is taken from the proper borrow sources.

Prior to the placement of the next layer of the cover, the CQA Site Manager or the QC Technicians under the supervision of the CQA Site Manager shall inspect the completed layer and document any of the following:

- Erosion of the layer surface
- Cracking or desiccation of the surface
- Fill areas that may contain excessive organics or other debris
- Depressions, or settlement of the layer
- Irregularities in the layer surface (e.g. grading errors)

Any documented items that constitute non-conformance with the Drawings and Technical Specifications should be corrected prior to placement of the subsequent layer of the cover.

5.6.1.1 Random Fill

Random fill will be used for each of the lower three layers of the cover system. The fill will consist of mixtures of sands and silts with varying amounts of clay and random amounts of gravel and rock-size material. In the initial bridging lift of the platform fill, rock sizes of up to 2/3 of the thickness of the lift will be allowed. On all other random fill lifts, rock sizes will be limited to 2/3 of the lift thickness, with at least 30 percent of the material finer than the No. 40 sieve. The portion passing the No. 40 sieve, will classify as CL, SC, ML or SM materials under the Unified Soil Classification System. Oversized material will be controlled through selective excavation at the stockpiles and through the utilization of a grader, bulldozer or backhoe to cull oversize materials from the fill. The source of these materials will be site stockpiles from previous cell construction activities.

Testing for all layers except the lower layer of platform fill shall consist of No. 200 sieve wash and particle-size distribution testing (ASTM D422), and Atterberg limits (ASTM D4318) at a frequency of at least one test per 2,000 cubic yards of fill placed, or when material characteristics show a significant variation.

5.6.1.2 Rock Mulch

Rock mulch material shall be free from roots, branches, rubbish, and debris. The rock portion of the rock mulch will consist of granular materials from approved off-site sources.

The mixture will be 25 percent gravel (with a D₁₀₀ less than 1-inch) by weight. Rock will be purchased from nearby commercial sources of alluvial gravel and cobbles. The rock portion of

the rock mulch shall be a screened product and have a maximum particle size of less than 1-inch. The soil portion of the rock mulch will consist of select material from the on-site topsoil borrow area.

Gradation specifications for the rock used for rock mulch material shall be confirmed by gradation testing prior to mixing with the topsoil, to determine the maximum particle size. Testing shall consist of particle-size distribution testing (ASTM D422) at a frequency of at least one test per 2,000 cubic yards of rock delivered to the site, or when rock characteristics show a significant variation.

Gradation specifications for rock mulch material (topsoil-gravel mixture) shall be confirmed by gradation testing, on samples collected from the point of placement (on the topdeck). Testing shall consist of particle-size distribution testing (ASTM D422) at a frequency of at least one test per 2,000 cubic yards of mixture placed, or when the characteristics of the mixture show a significant variation.

Rock mulch thickness will be controlled through establishment of grade stakes placed on a 200 x 200 foot grid on the top of the cells and by a 100 x 100 foot grid on the cell slopes. Physical checks of rock mulch depth will be accomplished through the use of hand dug test pits at the center of each grid in addition to monitoring the depth indicated on the grade stakes.

5.6.1.3 Topsoil

Topsoil will consist of select material from the on-site topsoil borrow area. The topsoil shall have a plasticity index (PI) less than 10 (%), as determined by Atterberg limits testing.

Material specifications for the topsoil material shall be confirmed by Atterberg limits testing (ASTM D4318) on samples of the topsoil, once for each 1,000 cubic yards of total topsoil material placed (including the quantity of topsoil added to the rock mulch mixture).

5.6.2 Material Placement

QC Technicians will observe the surface condition prior to fill placement. If the compacted surface of any layer of fill is too dry or smooth to bond properly with the layer of material to be

placed thereon, it will be moistened and/or reworked with a harrow, scarifier, or other suitable equipment to a sufficient depth to provide relatively uniform moisture content and a satisfactory bonding surface before the next succeeding layer of earthfill is placed. If the compacted surface of any layer of earthfill in-place is too wet (due to precipitation) for proper compaction of the earthfill material to be placed thereon, it will be reworked with harrow, scarifier or other suitable equipment to reduce the moisture content to the required level. It will then be recompacted to the earthfill requirements.

Nesting of oversized material will be controlled through selective excavation of stockpiled material, observation of placement by QC Technicians with authority to stop work and reject material being placed and by culling oversized material from the fill utilizing a grader. Successive loads of material will be placed on the fill so as to produce the best practical distribution of material.

QC Technicians will monitor the weather and temperature conditions. No material will be placed when the fill material or the underlying material is frozen or when ambient temperatures do not permit the placement or compaction of the materials to the specified density without developing frost lenses in the fill.

QC Technicians will monitor and document lift thicknesses frequently to ensure the specifications are being met. The required layer and lift thicknesses are listed in Table 7.

Table 7 - Summary of Cover Component Layer and Lift Thicknesses

Cover Component	Material Type (USCS)	Layer Thickness	Lift Thickness
Platform Fill	CL, SC, ML or SM	30 in. (min.)	12 in. loose (max.)
Highly Compacted Layer	CL, SC, ML or SM	30 in. (min.)	6 in. compacted (max.)
Water Storage/Frost Barrier/Root zone	CL, SC, ML or SM	42 in. (min.)	18 in. loose (max.)
Topsoil or Rock Mulch	CL, ML, SC, SP, or SM	6 in. (min.)	6 in. (max.)

5.6.3 Moisture and Density Control

The QC Technicians will monitor placement, moisture conditioning, and compaction of the fill as it is placed. Prior to the start of field compaction operations, appropriate laboratory compaction curves will be obtained for the range of materials to be placed. Laboratory compaction curves based on complete Proctor tests will be conducted at the frequencies outlined in Table 8, depending on the variability of materials being placed.

Each layer of the fill will be conditioned so that the moisture content is uniform throughout the layer prior to and during compaction. As far as practicable, materials will be brought to the proper moisture content before placement. If necessary, water will be added after lift placement to the material by sprinkling on the layer. Each lift will be compacted by a sufficient number of roller passes or other compaction equipment to achieve the required dry density. Material that is too dry or too wet or does not meet the required dry density will be rejected and will be reworked until the moisture content and dry density are within the specified limits. Reworking may include removal, re-harrowing, reconditioning, re-rolling, or combinations of these procedures.

The required testing frequencies are included in Table 8. For all materials (except lower layer of platform fill at 80 percent compaction), a minimum of two tests will be taken for each day that an applicable amount of fill is placed in excess of 150 cubic yards. A minimum of one test per lift and at least one test for every full shift of compaction operations will be taken.

Table 8 - Summary of Cover Component Moisture-Density Testing Frequencies and Requirements

Cover Component	Test Frequency	Density Requirement*	Moisture Requirement*	Proctor Frequency
Upper Layer of Placed Platform Fill	1/1,000 cubic yards placed	** 95% (min.)***	n.a.	1/5,000 cubic yards placed
Highly Compacted Layer	1/500 cubic yards placed	95% (min.)	n.a.	1/2,500 cubic yards placed
Water Storage/Frost Barrier/Root zone)	1/1,000 cubic yards placed	85% (min.)	n.a.	1/5,000 cubic yards placed
Topsoil or Rock Mulch	1/500 cubic yards placed	80-85%	-3% to Optimum	1/2,500 cubic yards placed

* Based on maximum dry density and optimum water contents as determined by standard Proctor tests (ASTM D698 Method A or C) on the same material.

**Lower layer of platform fill will be placed at 80 percent compaction and does not require compaction testing.

***Upper 6 inches of the platform fill only.

Field density testing may be conducted with the sand cone test (ASTM D1556) or a nuclear density gauge (ASTM D6938, or as modified by the QA Manager). Correlation of nuclear density gauge results shall be by comparison with results from sand cone test(s) and laboratory testing for water content(s) using the oven drying method (ASTM D2216) on similar material. A sufficient number of sand cone tests and moisture content tests will be performed to provide a correlation between the sand cone and nuclear density tests. Field density tests shall be compared with standard Proctor tests (ASTM D698 Method A or C) on the same material. Rock corrections (ASTM D4718) for oversize particles may be required for the rock mulch mixture (or other materials) depending on the gradation of the gravel material selected.

The actual frequency of testing may be increased by the CQA Site Manager if variability of materials is noted at the site, during adverse conditions, or to isolate failing areas of the construction.

5.6.4 Surface Slopes and Grades

The final cover surface shall have maximum side slopes of 5:1 and a top surface sloping in the direction and grade shown on the Drawings. The side slopes and top surface shall be free from abrupt changes in grade or areas of runoff concentration. The perimeter apron at the toe of the side slopes shall have a minimum width of 20 feet from the toe of the side slopes and slope away from the toe of the side slopes (as shown on the Drawings).

5.6.5 Tolerances

The completed cover surface shall be constructed to within 1.0 foot (horizontally) of the lines as designed, and within 0.1 foot (vertically) of the elevations as designed. The final surface of the subsoil zone shall be smoothed to avoid abrupt changes in surface grade. The layer thicknesses shall meet the required minimum thicknesses.

5.6.6 Nonconformance, Corrective Action and Stop Work

The CQA Site Manager and QC Technicians will have the authority to reject material that is brought to the site or material that has been placed. For a failed field moisture/density test, the

QC Technician will determine the extent and depth of the affected area and require the Contractor to re-work the material as described above. If persistent failed tests occur (indicating inadequate compaction methods), the CQA Site Manager will have the authority to stop the work until the underlying cause is determined and the Contractor can demonstrate that the moisture/density specifications can be met.

5.6.7 Documentation

All field and laboratory test results, observations of fill placement, and field compaction test results will be recorded using the appropriate field forms and reports, as described in Section 4. Table 9 includes a summary of the required materials testing and frequencies for the cover components.

Table 9 - Summary of Testing Frequency and Criteria for Cover Components

Component	Test	ASTM Standard	Frequency	Criteria
Random Fill (highly compacted & water storage layers)	Gradation with 200 Wash	D422	1/2,000 cubic yards	Max. Particle = 2/3 of lift thickness, Min. 30% passing the No. 40 sieve*
	Atterberg Limits	D4318	1/2,000 cubic yards	CL, SC, ML or SM
Rock Mulch	Gradation	D422	1/2,000 cubic yards	D ₁₀₀ < 1 inch
Topsoil	Atterberg Limits	D4318	1/1,000 cubic yards	Max PI < 10

*Each lift after the initial tailings bridging lift.

5.7 Rock Protection and Erosion Control

The top and side slopes of the reclaimed cover will be protected by rock surfacing. The size, thickness and gradation requirements for the rock protection are provided in the Drawings and Technical Specifications.

5.7.1 Material Conformance Monitoring and Testing

Riprap will be a screened product transported from gravel sources north of the project site. The CQA Contractor will perform monitoring and frequent verification testing to confirm that the riprap meets the gradation and durability specifications.

During active riprap placement, each load of material will be visually checked against standard piles for gradation prior to transport to the tailings cells.

5.7.1.1 Erosion Protection and Apron Rock

Material for the perimeter aprons and slope erosion protection will consist of granular materials from approved off-site areas. Perimeter apron rock shall meet NRC long-term durability requirements (rock quality designation of 65 or more).

Perimeter apron rock shall be a screened product, free from roots, branches, rubbish, and debris. The specifications as given below are for rock quality designations of 70 or higher. If actual rock quality designation is between 65 and 69, additional oversizing will be required. Rock quality designations below 65 will not be acceptable.

Designated gradations for the apron rock will be specified on the final drawings for construction. Apron rock will be imported from off-site.

- Side slope riprap shall have a minimum D_{50} as listed below and a minimum layer thickness of 1.5 times the D_{50} or the D_{100} of the riprap, whichever is greater:
 - 1.7 in. for non-accumulating flow side slopes
 - 5.3 in. for Cell 4A and Cell 4B southern side slopes
 - 4.5 in. for Cell 1 Disposal Area side slope
- Rock aprons shall have a minimum D_{50} as listed below and a minimum layer thickness of 1.5 times the D_{50} or the D_{100} of the riprap, whichever is greater:
 - 3.4 in. for Rock Apron A
 - 10.5 in. for Rock Apron B
 - 9.0 in. for Rock Apron C

Rock Apron C shall have a minimum D_{50} of 9.0. Material specifications for the perimeter apron rock shall be confirmed by gradation testing conducted by the CQA Laboratory. Testing shall consist of particle-size distribution testing (ASTM D422) at a frequency of at least one test per 10,000 cubic yards of rock delivered to the site, or when rock characteristics show a significant variation.

Rock layer thickness will be controlled through establishment of grade stakes placed on a 200 x 200 foot grid on the top of the cells and by a 100 x 100 foot grid on the cell slopes. Physical checks of riprap depth will be accomplished through the use of hand dug test pits at the center of each grid in addition to monitoring the depth indicated on the grade stakes.

Test series for rock durability will include specific gravity, absorption, sodium soundness and LA abrasion. During construction additional test series and gradations will be performed for each type of riprap when approximately one-third ($1/3$) and two-thirds ($2/3$) of the total volume of each type have been produced or delivered. For any type of rock where the volume is greater than 30,000 cubic yards, a test series and gradations will be performed for each additional 10,000 cubic yards of rock produced or delivered. Gradations will also be performed at the direction of the QC Technician for any locations considered inadequate based on visual inspection by the QC Technician, or if difficulties are experienced by the Contractor during rock placement.

5.7.1.2 Erosion Protection Filter

Erosion protection filter material shall be free from roots, branches, rubbish, and debris. Filter material will generally be classified as sand containing gravel and fines and shall meet the following gradation specifications.

Table 10 – Filter Material Gradation

Sieve Size	Percent Passing, by Weight
3-inch	100
No. 4	70-100
No. 20	40-60
No. 200	0-5

Material specifications for the perimeter apron rock shall be confirmed by gradation testing conducted by the CQA Laboratory. Testing shall consist of particle-size distribution testing (ASTM D422) at a frequency of at least one test per 10,000 cubic yards of rock delivered to the site, or when rock characteristics show a significant variation.

Filter layer thickness will be established during construction with grade stakes placed on a grid or centerline and offset pattern and layer thickness marks on each grade stake. The minimum thickness of the layer will be verified by spot checking of layer thickness by hand excavation in selected locations.

5.7.2 Material Placement

QC Technicians will monitor riprap placement. An initial section of each type of riprap constructed shall be visually examined and used to evaluate future placement. The initial section will be constructed with material meeting gradation and riprap thickness requirements. Initial testing should be conducted to determine the gradation and the rock weight/unit volume that will be achieved in future rock placement activities. Riprap material will be hauled to the reclaimed surfaces and placed on the surfaces using belly dump highway trucks and road graders. Riprap will be dumped in windrows and the grader will spread the riprap in a manner to minimize segregation of the material. Depth of placement will be controlled through the establishment of grade stakes. Minimum required thicknesses for riprap layers are provided in Section 5.7.1. Physical checks of riprap depth will be accomplished through the use of hand dug test pits at the center of each grid in addition to monitoring the depth indicated on the grade stakes. The Contractor will excavate the test pits, and QC Technicians will observe and document the excavation. Placement of riprap will avoid accumulation of riprap sizes less than the minimum D_{50} size and nesting of the larger sized rock. Additional riprap placement requirements include:

- Individual stones shall not be greater than 90 percent of the riprap layer thickness.
- Dumped riprap shall be placed to its full course thickness in one operation and in such a manner as to avoid displacing bedding material.

- Hand placement or rearrangement of individual stones will be required only to the extent necessary to secure the results specified above. Larger stones may require individual placement by equipment.
- Any stones that are not firmly wedged shall be adjusted and additional selected stones inserted or existing stones replaced, so as to achieve a solid interlock.

5.7.3 Compaction

QC staff will monitor riprap placement. The riprap layer will be compacted by at least two passes by a D7 Dozer, tamping with the bucket of a trackhoe, or equivalent methods in order to key the rock for stability.

5.7.4 Tolerances

The completed riprap shall be placed to within 5.0 foot (horizontally) of the layout as designed, and within 0.5 foot (vertically) of the elevations as designed. The rock layer thicknesses shall meet the minimum requirements. Minimum required thicknesses for riprap layers are provided in Section 5.7.1. Riprap layer thickness will be directly measured as outlined in Section 5.7.2. A measurement device (i.e. tape measure) may be used to determine the distance from the top of the bedding or filter layer to the top of the riprap layer.

5.7.5 Nonconformance, Corrective Action and Stop Work

The CQA Site Manager and QC Technicians will have the authority to reject riprap that is brought to the site or riprap that has been placed. For rejected riprap, QC Technicians will identify the extent of inadequate riprap and will require the Contractor to excavate the material and place additional riprap. If persistent failed tests occur (indicating inadequate placement methods), the CQA Site Manager will have the authority to stop the work until the underlying cause is determined and the Contractor can demonstrate that the riprap can be placed according to the specifications.

5.7.6 Documentation

All field and laboratory test results, observations of riprap placement, and field compaction test results will be recorded using the appropriate field forms and reports, as described in Section 4.

Table 11 includes a summary of the required materials testing and frequencies for the erosion protection materials.

Table 11 - Summary of Testing Frequency and Criteria for Erosion Protection

Component	Test	ASTM Standard	Frequency	Criteria
Riprap*	Gradation with 200 Wash	D422	1/10,000 cubic yards	D ₅₀ and Durability*
Riprap Filter	Gradation with 200 Wash	D422	1/10,000 cubic yards	See Table 10

*Rock durability testing per section 5.7.1.1

5.8 Protection of Soil Stockpiles

The Contractor shall maintain proper erosion control measures for stockpiles and may be required to cover piles in situations where precipitation is anticipated. The CQA Site Manager should document improper stockpile management in situations where the integrity of the material is affected. The Construction Manager and/or the CQA Officer should determine corrective measures.

6 FIELD REPORT FORMS

Form No. F-23

COMPLIANCE REPORT

Project No. _____

Date: _____

Construction Segment: _____

Drawing No.: _____

Specification No.: _____

Description of Completed Construction Segment:

By: CQA Officer _____

Approvals:

CQA Site Manager _____

DWMRC Project Manager _____

Form No. F-25

FIELD CHANGE ORDER

Project No. _____

Date: _____

Drawing No.: _____

Specification No.: _____

Design Feature:

Modifications:

Reason:

Initiated by: _____

Approved by: _____

CQA Site Manager

Form No. F-26

DESIGN CHANGE ORDER

Project No. _____

Date: _____

Drawing No.: _____

Specification No.: _____

Design Feature:

Change in Design:

Reason:

Initiated by: _____

Approvals:

CQA Site Manager: _____

DWMRC Project Manager: _____

Design Engineer: _____

ATTACHMENT D

SUPPORTING DOCUMENTATION FOR INTERROGATORY 06/1:

**REVISED APPENDIX E, SLOPE STABILITY ANALYSIS,
TO THE UPDATED TAILINGS COVER DESIGN REPORT
(APPENDIX D OF RECLAMATION PLAN, REVISION 5.0)**

APPENDIX E

SLOPE STABILITY ANALYSIS

E.1 INTRODUCTION

This appendix presents the methods, input and results of slope stability analyses of the tailings cells at the Energy Fuels Resources (USA) Inc. (EFRI) White Mesa Uranium Mill (Mill). The Mill is located approximately 6.0 miles south of Blanding, Utah. These analyses were conducted according to applicable stability criteria under static and seismic conditions, including geotechnical stability criteria in NRC (2003). These analyses are an update to the slope stability analyses presented in MWH (2011) to incorporate revisions to the analyses to address State of Utah, Division of Waste Management and Radiation Control (DWMRC) (formerly Utah Division of Radiation Control, DRC) interrogatories (DRC, 2012) and review comments on EFRI responses to 2012 interrogatories (DRC, 2013). These analyses also incorporate the revised cover grading design, results of cover material testing conducted in 2010 and 2012 (summarized in Attachment B of EFRI, 2012), and the results of tailings testing conducted in 2013 (presented in MWH, 2015b).

Slope stability analyses were performed using limit equilibrium methods with the aid of the computer program SLOPE/W (GEO-SLOPE, 2007). The SLOPE/W program calculates factors of safety by any of the following methods: (1) Ordinary Fellenius, (2) Bishop's Simplified, (3) Janbu's Simplified, (4) Spencer, (5) Morgenstern-Price, (6) U.S. Army Corps of Engineers, (7) Lowe-Karafiath, and (8) Generalized Limit Equilibrium. The Morgenstern-Price method (Morgenstern and Price, 1965) with a half-sine function for inter-slice forces was selected for performing the computations in SLOPE/W. The method uses both circular and non-circular shear surfaces and satisfies both moment and force equilibrium.

E.2 CRITICAL CONDITIONS AND GEOMETRY

Slope stability analyses are typically conducted for scenarios that represent the critical conditions for post-reclamation. For the White Mesa Mill tailings cells, critical conditions for post-reclamation were evaluated and included: (1) reclaimed outside surfaces of the embankment with a 5H:1V slope, (2) existing inside surfaces of the embankments with a 2H:1V slope, and (3) conservative shear strength parameters based on previous reports.

A critical cross section, cross section A, was selected through the southern dike of Cell 4A near the southeast corner of the impoundment. The cross section location was selected based on overall impoundment height as well as base topography and is similar to the location used for the slope stability analyses presented in Titan (1996). The location of cross section A is shown in Figure E.1. The tailings are planned to be dewatered prior to placement of the final portion of cover. The phreatic surface was estimated to be five feet above the liner system for the analyses.

A second cross section, cross section B, was selected through the northern embankment of the Cell 1 Disposal Area. This location was chosen to address DRC interrogatories (DRC, 2012). The location of cross section B is shown in Figure E.2. The material placed in the Cell 1 Disposal Area will include mill debris and contaminated soils. The embankment cross section was assumed to be fully drained and therefore a phreatic surface was not included in the analyses.

Slope stability analyses were performed by calculating factors of safety along circular and non-circular failure surfaces for both static and pseudo-static conditions. Circular failure surface analyses were conducted by targeting both shallow and deep failure surfaces. Block failure

surfaces through the clay liner system were evaluated for cross section B. A number of failure surfaces were analyzed in order to calculate the factor of safety for the critical failure.

E.3 MATERIAL PROPERTIES

Material strength parameters used for the slope stability analysis are based on parameters presented in Denison (2009) for the Cell 4B slope stability analyses conducted by Geosyntec, historical laboratory testing on tailings and clay materials (Advanced Terra Testing, 1996; Chen and Associates, 1987; D'Appolonia, 1982; and Western Colorado Testing, 1999), laboratory testing conducted in 2010 and 2012 on potential cover borrow materials (see Attachment B of EFRI, 2012), laboratory testing conducted in 2013 on tailings (MWH, 2015b) and typical published values. The parameters for each material are discussed below and summarized in Table E.1.

Erosion Protection: The erosion protection materials include riprap and filter material on the embankment slopes, and rock mulch on the top surface of the cover system. Typical density values for sand and gravel were used for the riprap and filter materials. The riprap and filter material strength parameters were estimated based on the lower bound typical values from Lambe (1969) for loose to medium dense sand and gravel. The rock mulch consists of topsoil material mixed with 25 percent gravel by weight. The density of the rock mulch was based on the 2012 laboratory testing results for topsoil (see Attachment B of EFRI, 2012) and applying a rock correction based on 25 percent gravel by weight. The total unit weight of the rock mulch was calculated using the estimated dry density and the long-term water content presented in the radon analyses. Effective strength parameters of the rock mulch were estimated as an angle of internal friction of 33 degrees and no cohesion, based on a maximum plasticity index (PI) of the topsoil of 10 percent (listed in the specifications), and using the generalized relationship between PI and effective angle of internal friction presented in Holtz and Kovacs (1981).

Cover System: The cover system material properties were estimated based on the updated geotechnical site investigation in April 2012. The total unit weight values used in the model for the random fill layers were estimated using 2010 and 2012 laboratory tests conducted on potential cover borrow materials (see Appendix A.2) and based on the compaction effort for each layer. The total unit weights for the cover layers were calculated using the long-term water contents for the cover layers used in the radon analyses. Effective strength parameters for the cover materials were estimated based on the maximum measured PI (30) from the 2010 and 2012 laboratory test results and using the generalized relationship between PI and effective angle of internal friction presented in Holtz and Kovacs (1981), resulting in an angle of internal friction of 29 degrees and no cohesion.

Tailings Material: The dry density of the tailings was estimated as 96 pcf, based on laboratory tests (Chen and Associates, 1987 and Western Colorado Testing, 1999) and assuming the upper bound long-term density of the tailings should be no greater than 90 percent of the average laboratory measured maximum dry density for tailings. This is the same density used for the radon analyses. The total unit weight of the tailings was calculated using the long-term water content assumed for the tailings in the radon analyses. Based on existing operations at the site, the tailings deposits are primarily fine sands with silt and some clay. The strength parameters of the tailings were conservatively estimated using the Naval Design Manual for Soil Mechanics DM7-01 (NAVFAC, 1986) as zero percent relative density silty sand. The strength parameters used for the tailings (no cohesion and an effective angle internal friction of 25 degrees) are consistent with the values presented in Denison (2009) for the Cell 4B design stability analyses.

Contaminated Soils/Mill Debris: The materials to be placed in the Cell 1 Disposal Area include contaminated soils and mill debris. The contaminated soils will be from on-site and have similar properties as the cover soils. The material properties for the contaminated soils and mill debris were conservatively assumed to be the same as the cover soils (compacted to 85 percent standard Proctor compaction).

Clay Liner: Cell 1 will be lined with a clay liner. The dry density of the clay was estimated based on laboratory tests performed on Section 16 clay (D'Appolonia, 1982; Advanced Terra Testing, 1996) and assuming the clay will be compacted to 95 percent of standard Proctor compaction. The total unit weight for the clay was calculated using the estimated dry density and a long-term water content of 14 percent. The long-term water content was estimated based on 15 bar water contents measured for Section 16 clay samples by Chen and Associates (1987) presented in Titan (1996). The strength parameters for the clay were estimated using the average measured PI (60) of samples meeting the placement specifications for minimum PI and percent passing the No. 200 sieve, and the generalized relationship between PI and effective angle of internal friction presented in Holtz and Kovacs (1981), resulting in an angle of internal friction of 24 degrees and no cohesion.

Dike and Foundation: Density and strength parameters for the existing foundation and dike material were estimated as the values presented in stability analyses performed for the design of Cell 4B by Geosyntec (Denison, 2009). The strength parameters used in the model were based on laboratory testing results from samples obtained from the existing berm between Cell 4A and 4B (Denison, 2009).

Bedrock: Failures are not anticipated to occur within the bedrock underlying the embankment, due to the relatively high strength of the underlying sedimentary rock. Therefore, the material properties for the bedrock were modelled as those consistent with sedimentary rock.

Table E.1. Material Parameters Used in Model

Material	Total Unit Weight (pcf)	Effective Cohesion (psf)	Effective Friction Angle (deg.)
Riprap	125	0	36
Riprap Filter	125	0	30
Rock mulch	110	0	33
Cover Upper Layer (85% SP compaction)	107	0	29
Cover Middle Layer (95% SP compaction)	120	0	29
Cover Lower Layer (80% SP compaction)	100	0	29
Random Fill	100	0	29
Tailings	95	0	25
Contaminated Soils/Mill Debris	107	0	29
Clay Liner	110	0	24
Dike	137	900	26
Foundation	137	900	26
Bedrock	130	10000	45

E.4 SEISMIC ANALYSIS AND SEISMICITY

Stability analyses under seismic conditions were conducted as pseudo-static analyses, where a horizontal acceleration or seismic coefficient is applied to both cross-sections. This seismic coefficient represents the horizontal accelerations applied on the structure by an earthquake. A coefficient of 0.1 g was used for the analyses based on the site-specific probabilistic seismic hazard analysis (MWH, 2015a). This seismic coefficient represents the seismic loading for the Maximum Credible Earthquake (MCE) calculated to occur during the long-term life of the embankment. A summary of the site seismicity is provided in the MWH (2015a).

A liquefaction analysis was conducted for the tailings and is presented in Appendix F (revised version provided as Attachment G to this submittal). The results indicate the tailings are not susceptible to earthquake-induced liquefaction. For materials that do not liquefy or lose shear strength with seismic shaking, seismic slope stability is analyzed by a pseudo-static approach. This consists of application of an equivalent horizontal acceleration or seismic coefficient to the structure being analyzed. The seismic coefficient represents an inertial force due to strong ground motions during the design earthquake, and is represented as a fraction of the peak ground acceleration (PGA) at the site (typically at the base of the structure). The strategy of representing the seismic coefficient as a fraction of the PGA has been adopted in review of uranium tailings facility design and documented in DOE (1989). A seismic coefficient of 2/3 of the PGA typically represents the post-reclamation conditions. MWH (2015a) estimated the mean PGA for reclaimed conditions to be 0.15g. The seismic coefficient used for the pseudo-static stability analysis is 0.10g (equal to 2/3 of the PGA).

E.5 DISCUSSION OF STABILITY ANALYSIS RESULTS

The results of stability analyses for Cross-section A and B are presented in Table E.2. These values represent the lowest calculated factor of safety from a number of individual failure surfaces for a Morgenstern-Price Analysis.

Table E.2. Slope Stability Analysis Results

Cross-Section	Failure Type	Loading Condition	Required Factors of Safety	Calculated Factors of Safety
Cross Section A - Cell 4A Embankment	Shallow Circular	Static	1.5	3.05
		Pseudo-Static	1.1	1.99
	Deep Circular	Static	1.5	3.86
		Pseudo-Static	1.1	2.53
Cross Section B – Cell 1 Embankment	Shallow Circular	Static	1.5	2.64
		Pseudo-Static	1.1	1.71
	Deep Circular	Static	1.5	2.71
		Pseudo-Static	1.1	1.76
	Block	Static	1.5	2.76
		Pseudo-Static	1.1	1.80

As shown in Table E.2, all calculated factors of safety were significantly above the NRC recommended values of 1.5 for static conditions and 1.1 for pseudo-static conditions. The model profile figures and SLOPE/W output figures for static and pseudo-static loading conditions are shown in Figures E.3 through E.14.

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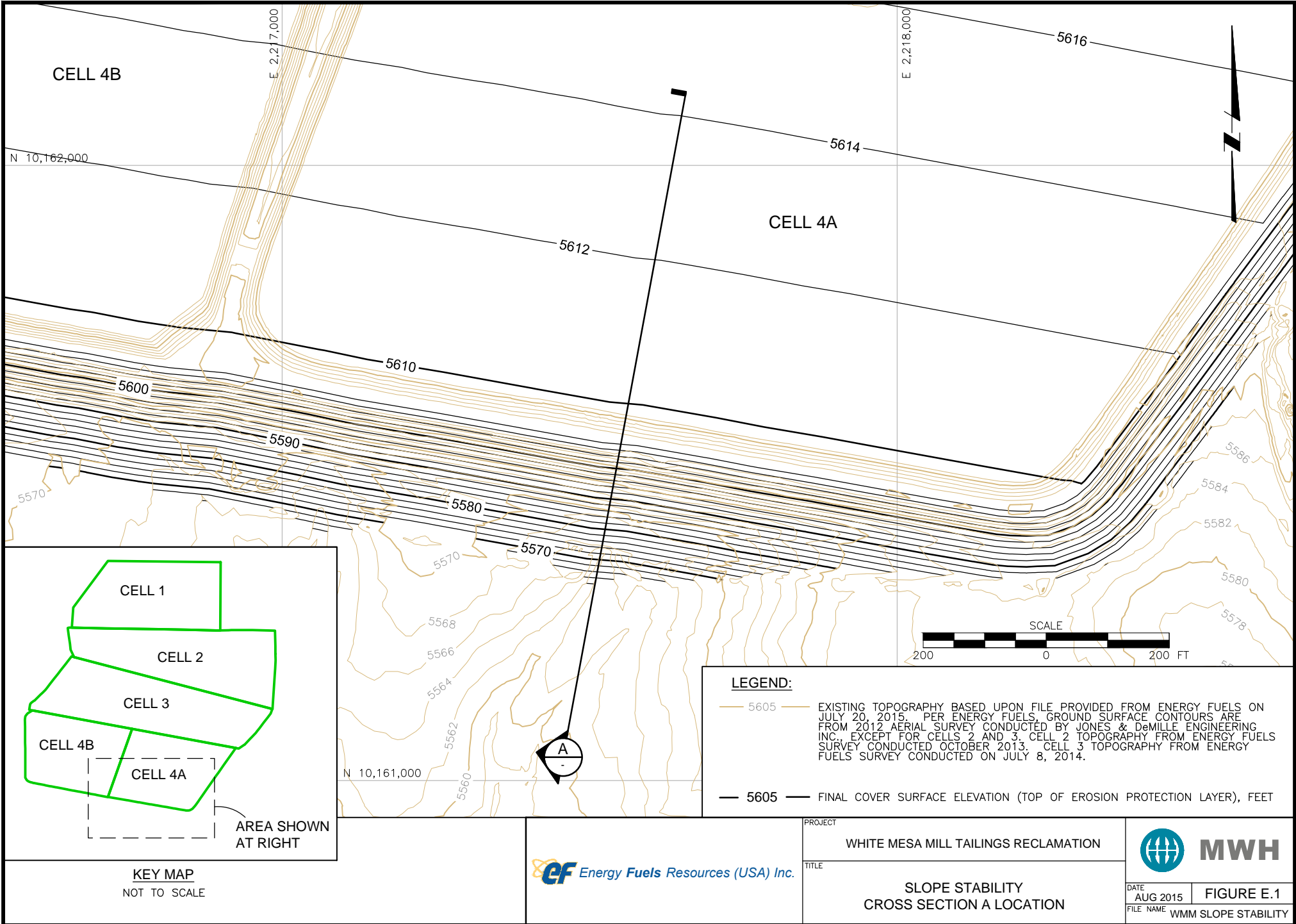
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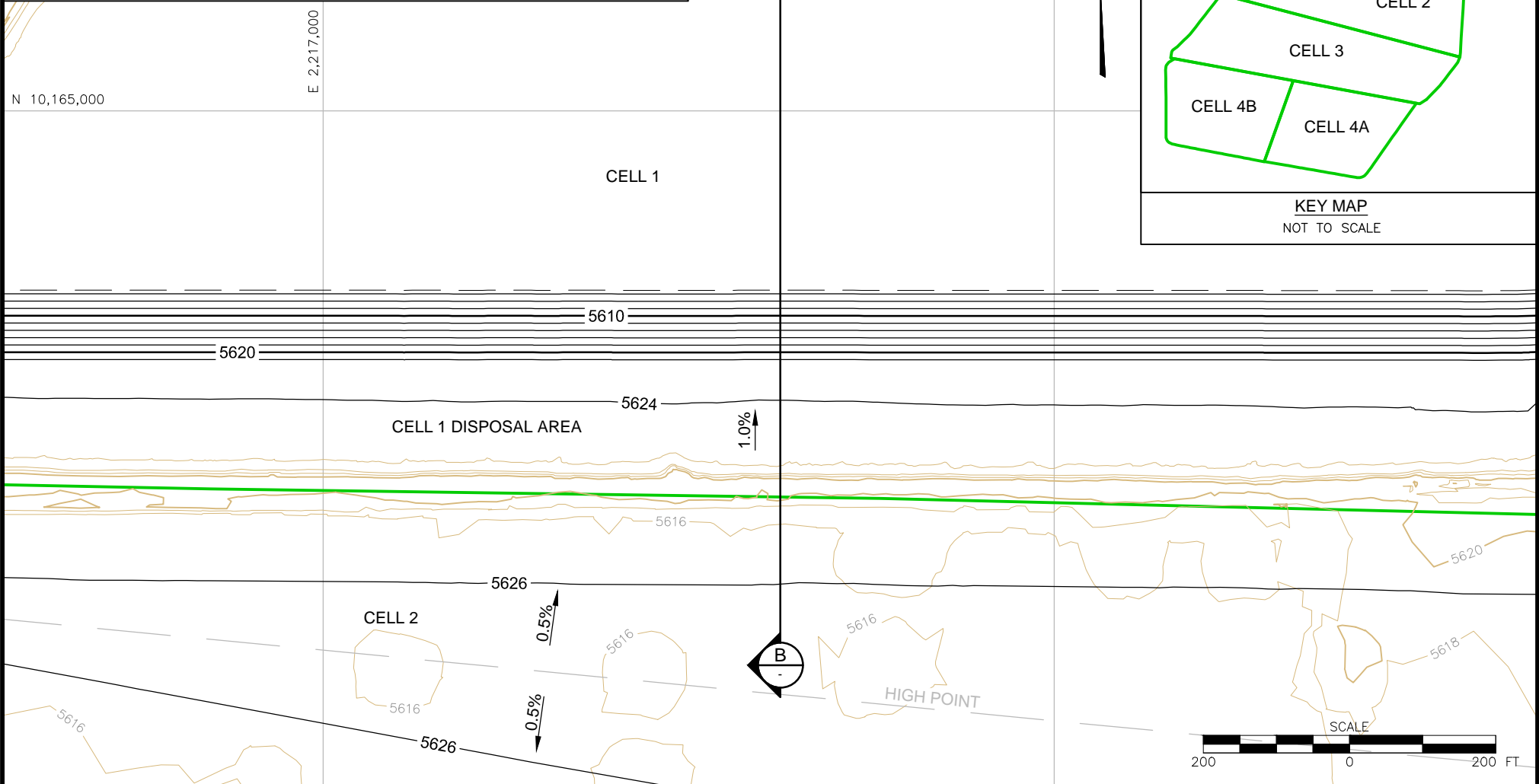
Utah Department of Environmental Quality, Division of Radiation Control (DRC), 2013. Review of August 15, 2012 (and May 31, 2012) Energy Fuels Resources (USA), Inc. Responses to Round 1 Interrogatories on Revision 5 Reclamation Plan Review, White Mesa Mill, Blanding, Utah, report dated September 2011. February 13.

Western Colorado Testing, Inc., 1999. Report of Soil Sample Testing of Tailings Collected from Cell 2 and Cell 3, Prepared for International Uranium (USA) Corporation. May 4.



LEGEND:

- 5605 EXISTING TOPOGRAPHY BASED UPON FILE PROVIDED FROM ENERGY FUELS ON JULY 20, 2015. PER ENERGY FUELS, GROUND SURFACE CONTOURS ARE FROM 2012 AERIAL SURVEY CONDUCTED BY JONES & DEMILLE ENGINEERING INC., EXCEPT FOR CELLS 2 AND 3. CELL 2 TOPOGRAPHY FROM ENERGY FUELS SURVEY CONDUCTED OCTOBER 2013. CELL 3 TOPOGRAPHY FROM ENERGY FUELS SURVEY CONDUCTED ON JULY 8, 2014.
- 5605 FINAL COVER SURFACE ELEVATION (TOP OF EROSION PROTECTION LAYER), FEET



Energy Fuels Resources (USA) Inc.

PROJECT
WHITE MESA MILL TAILINGS RECLAMATION

TITLE
SLOPE STABILITY
CROSS SECTION B LOCATION

MWH

DATE
AUG 2015

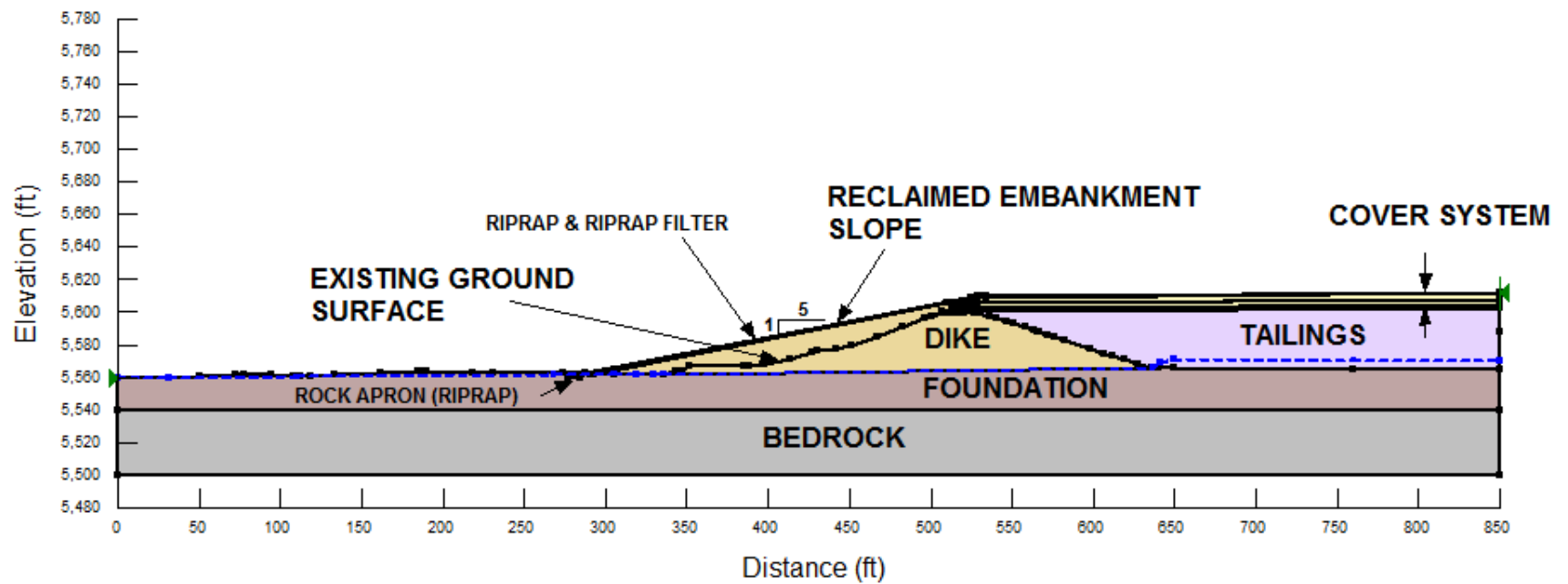
FILE NAME
WMM SLOPE STAB B

FIGURE E.2

EFRI - White Mesa Mill

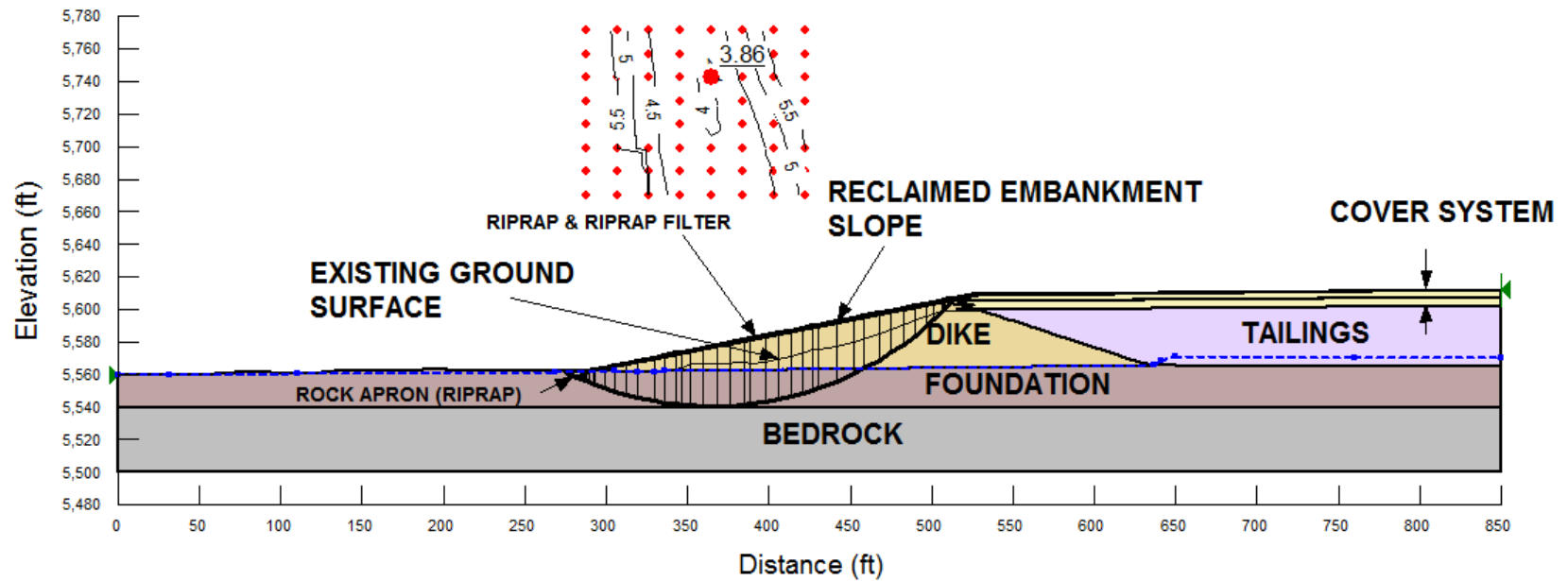
Cross Section A

Closure



EFRI - White Mesa Mill Cross Section A Closure

Static Loading Conditions
Required Factor of Safety: 1.5

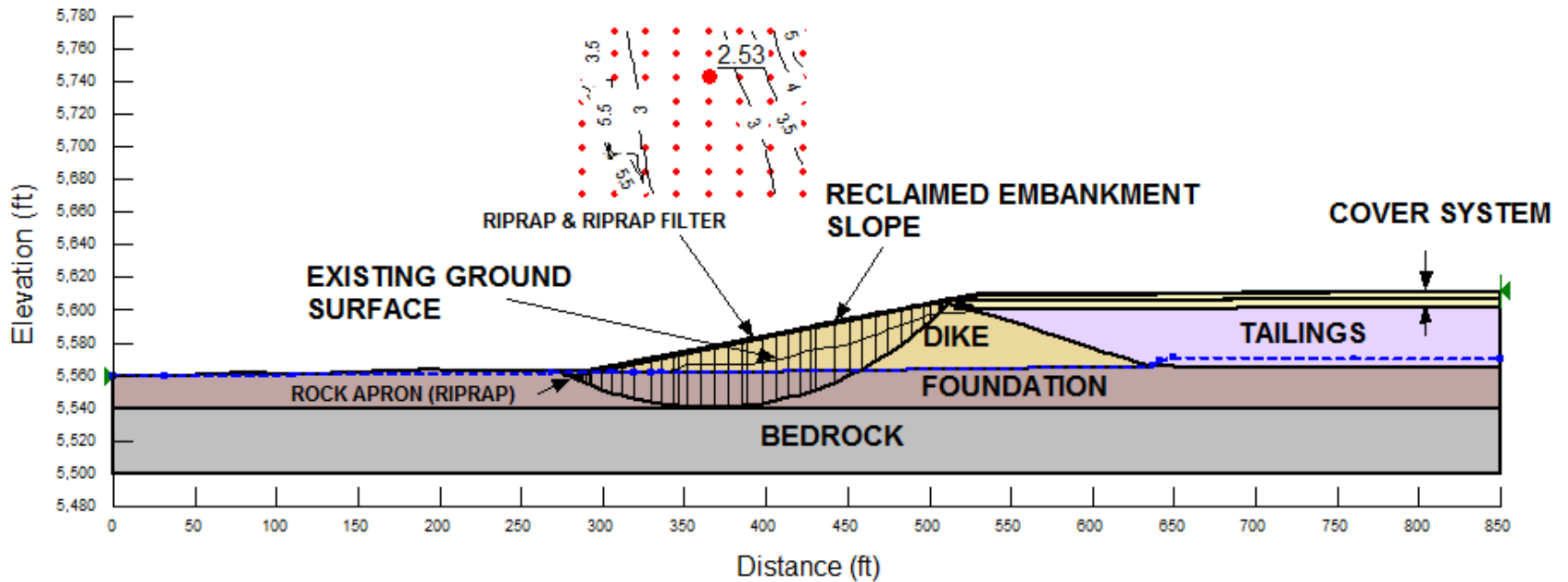


EFRI - White Mesa Mill

Cross Section A

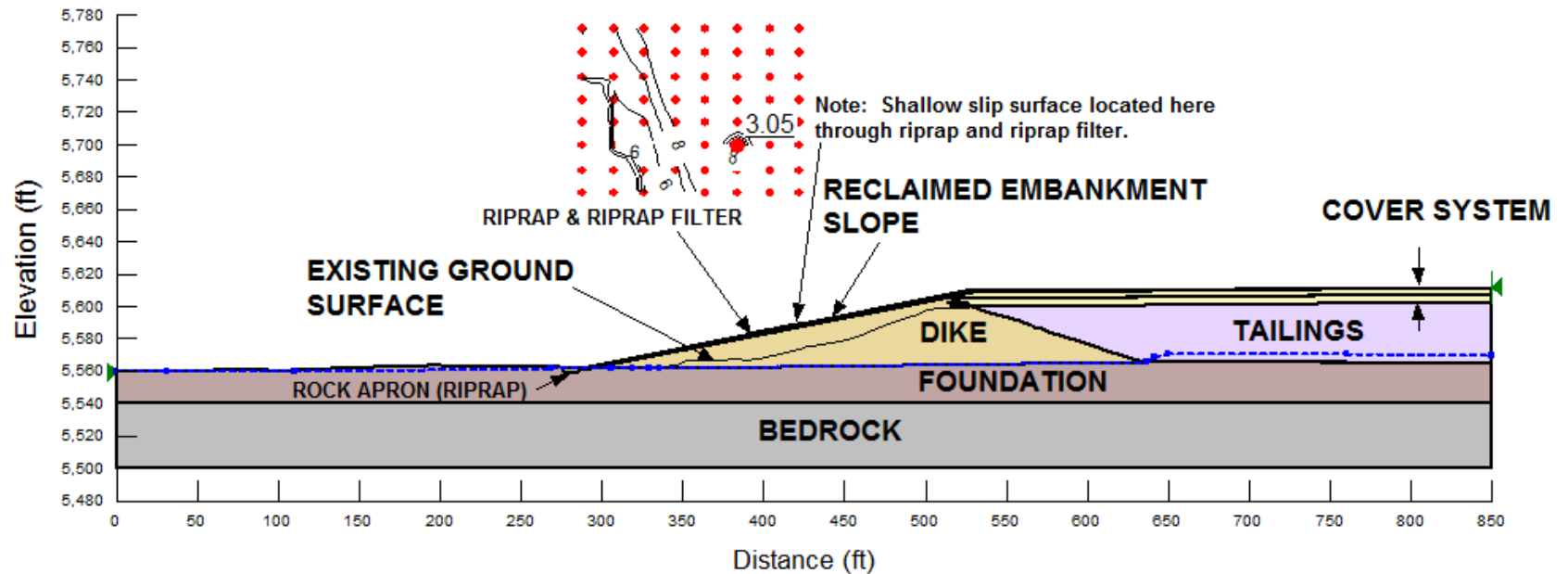
Closure

Pseudo-Static ($k = 0.1g$) Loading Conditions
Required Factor of Safety: 1.1



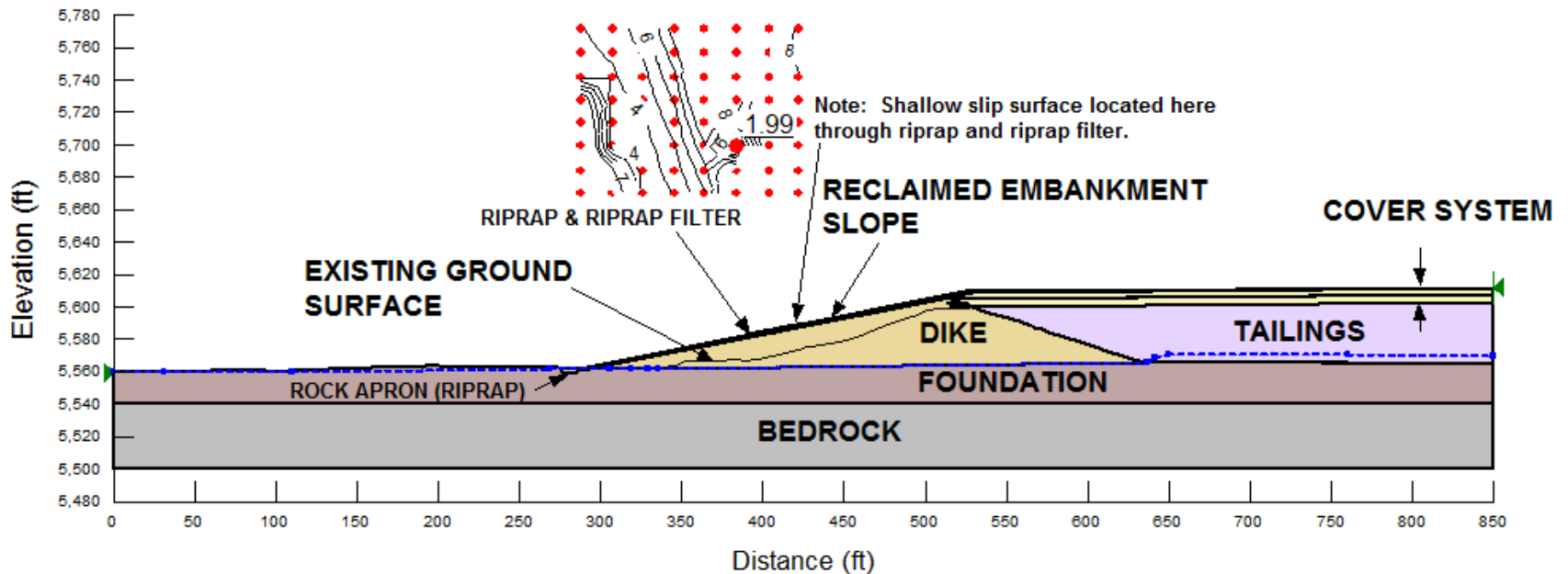
EFRI - White Mesa Mill Cross Section A Closure

Static Loading Conditions
Required Factor of Safety: 1.5



EFRI - White Mesa Mill Cross Section A Closure

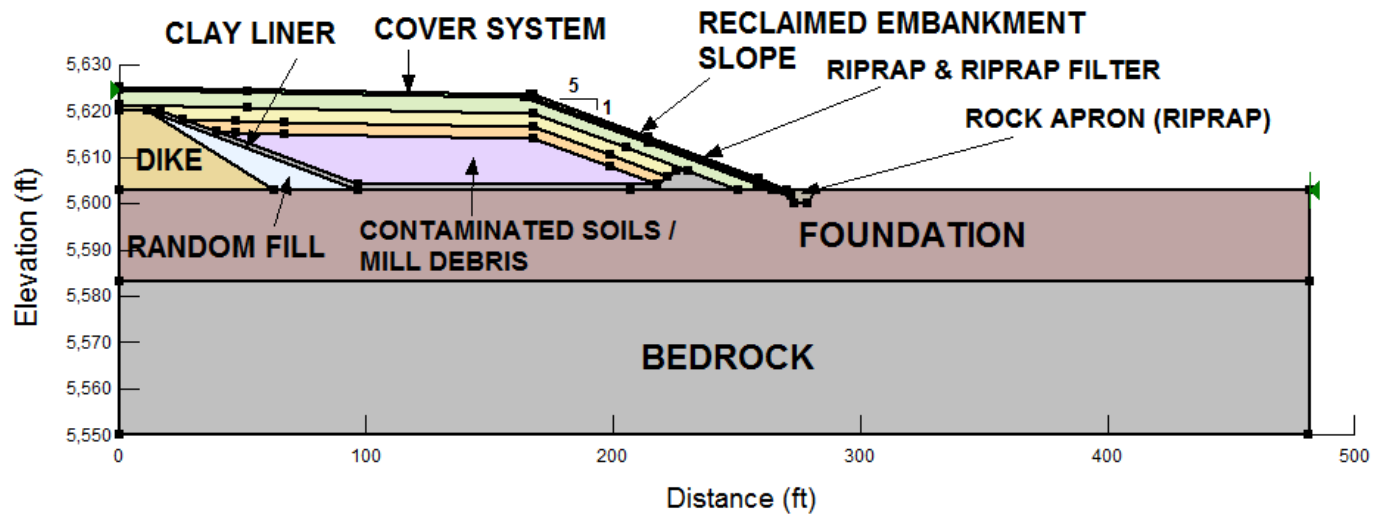
Pseudo-Static ($k = 0.1g$) Loading Conditions
Required Factor of Safety: 1.1



EFRI - White Mesa Mill

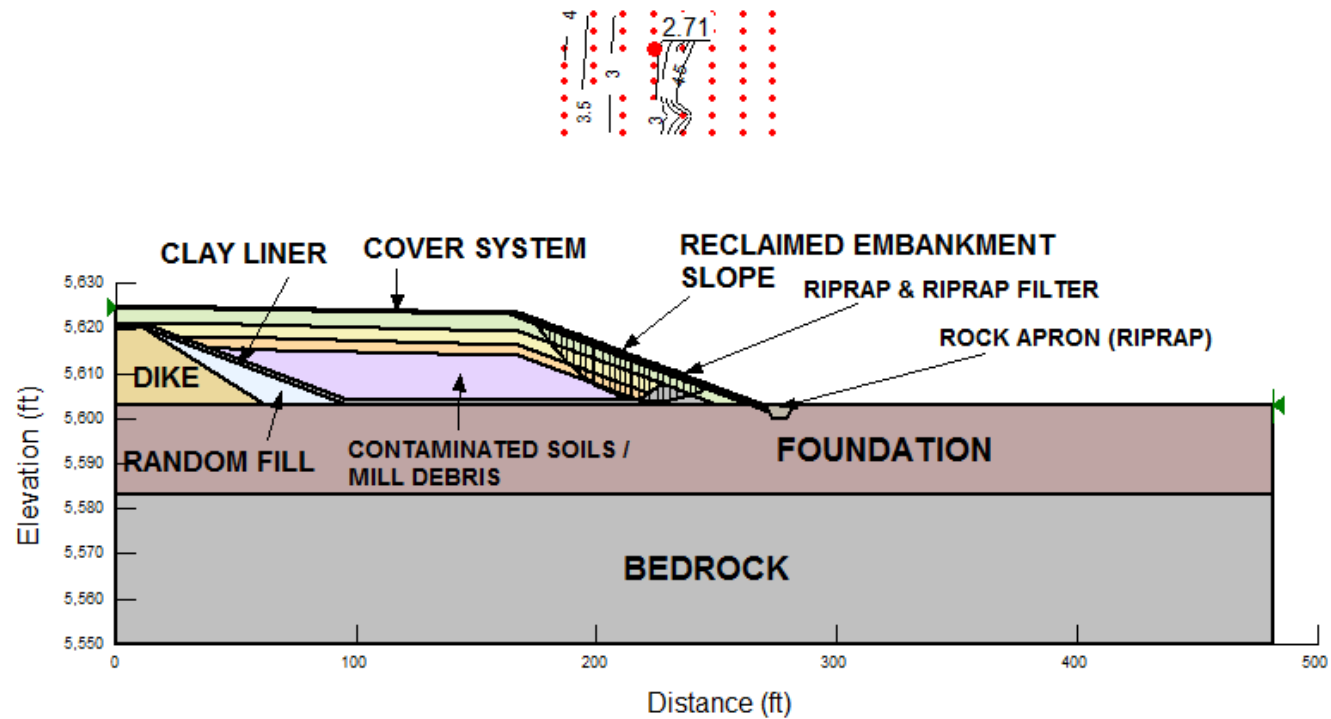
Cross Section B

Closure



EFRI - White Mesa Mill Cross Section B Closure

Static Loading Conditions
Required Factor of Safety: 1.5

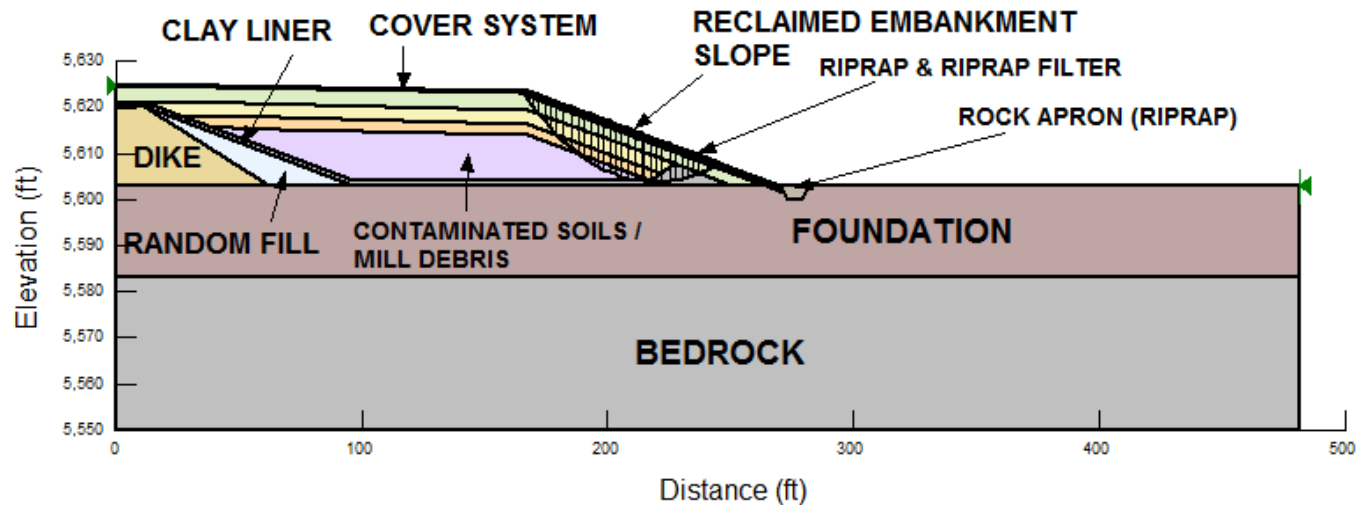
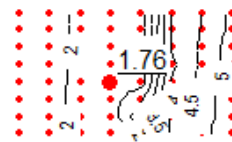


EFRI - White Mesa Mill

Cross Section B

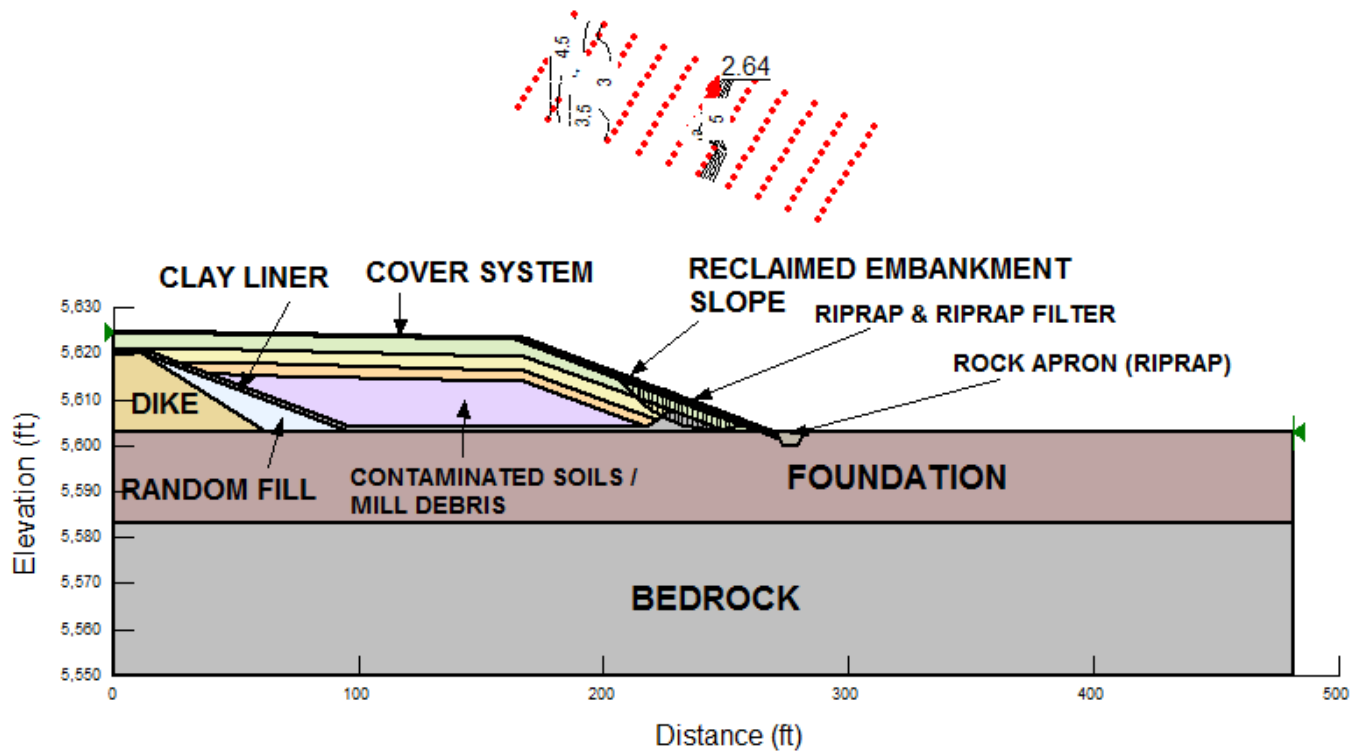
Closure

Pseudo-Static Loading Conditions
Required Factor of Safety: 1.1



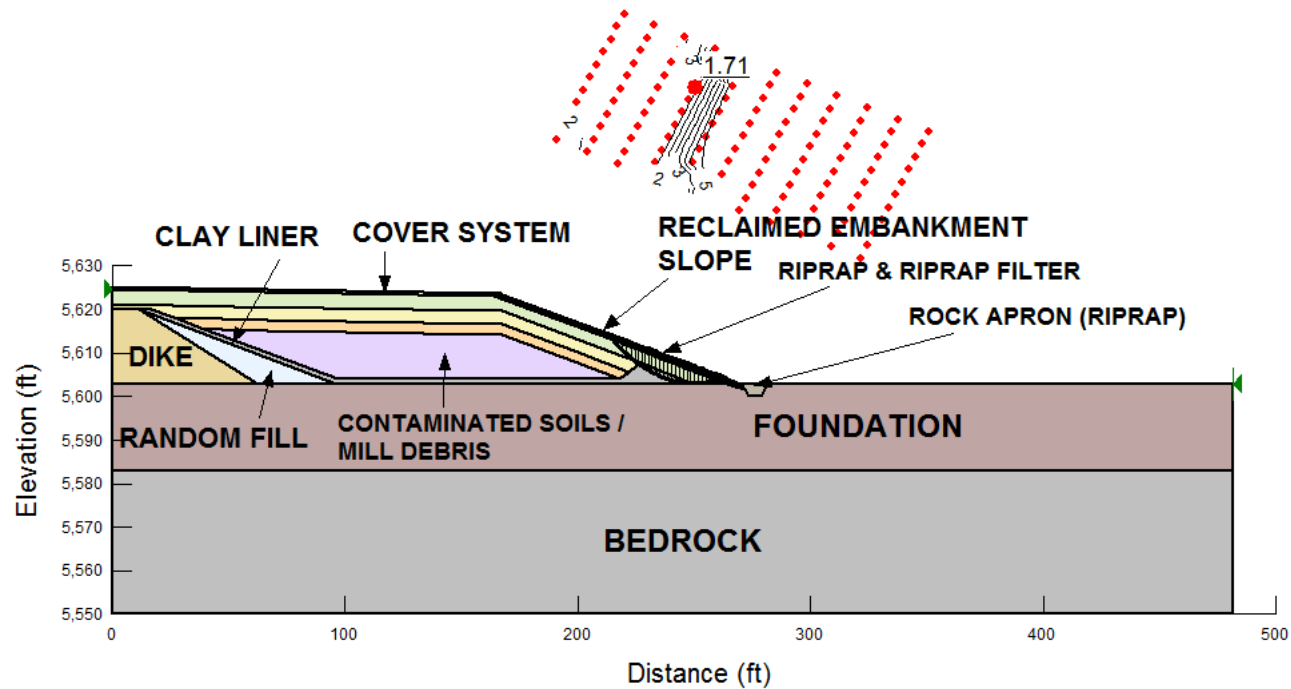
EFRI - White Mesa Mill Cross Section B Closure

Static Loading Conditions
Required Factor of Safety: 1.5



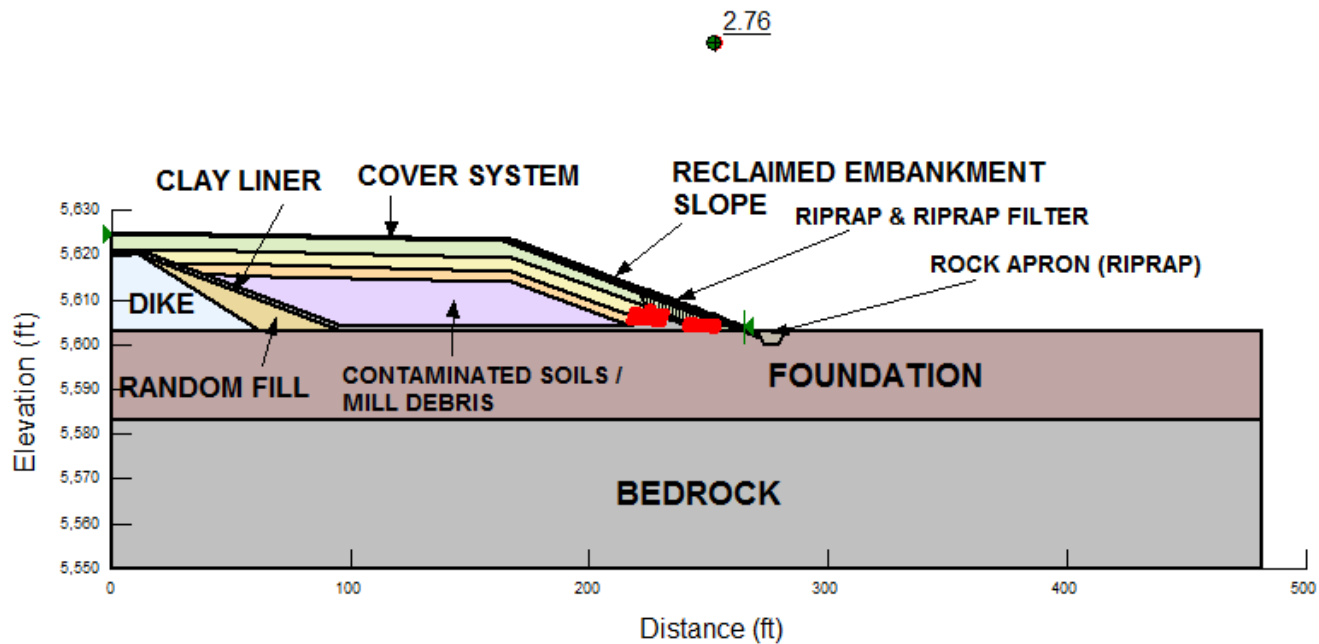
EFRI - White Mesa Mill **Cross Section B** **Closure**

Pseudo-Static ($k = 0.1g$) Loading Conditions
Required Factor of Safety: 1.1



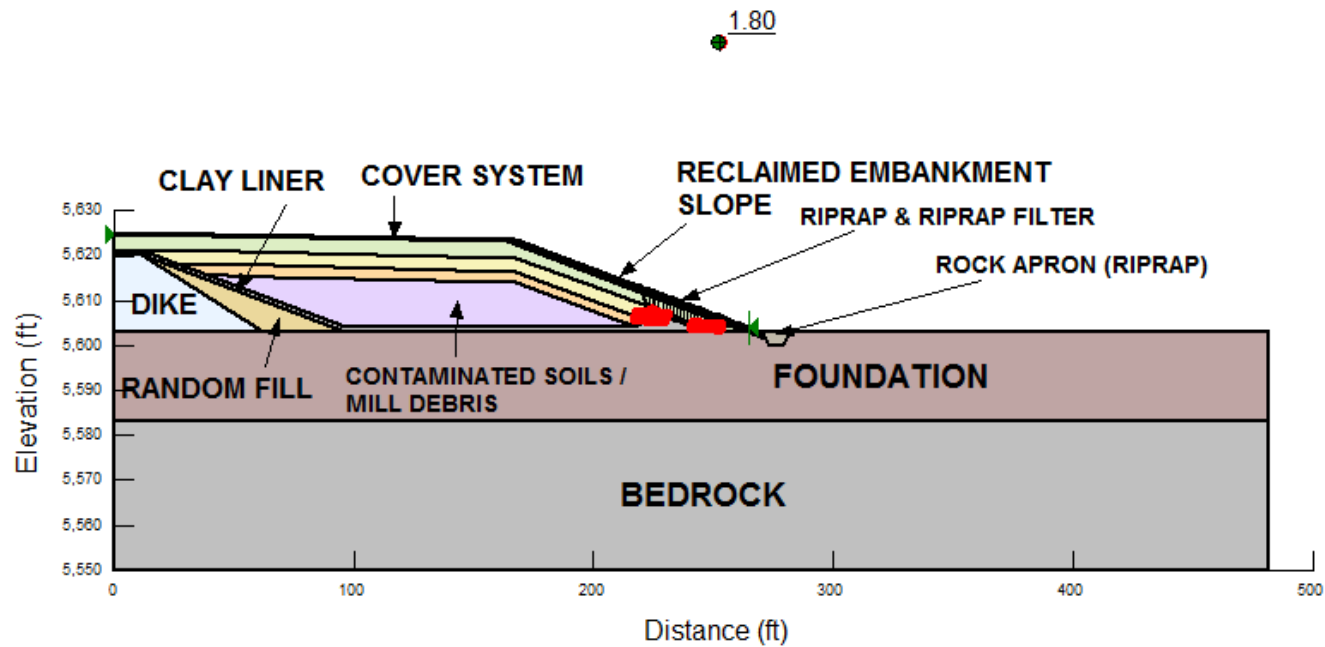
EFRI - White Mesa Mill **Cross Section B** **Closure**

Block Failure - Static Loading
Required Factor of Safety: 1.5



EFRI - White Mesa Mill **Cross Section B** **Closure**

Block Failure - Pseudo-Static ($k = 0.1g$) Loading Conditions
Required Factor of Safety: 1.1



ATTACHMENT E

SUPPORTING DOCUMENTATION FOR INTERROGATORY 07/1 and 09/1:

**REVISED APPENDIX F, SETTLEMENT AND LIQUEFACTION ANALYSES, TO THE
UPDATED TAILINGS COVER DESIGN REPORT (APPENDIX D OF THE
RECLAMATION PLAN, REVISION 5.0)**

APPENDIX F

SETTLEMENT AND LIQUEFACTION ANALYSES

F.1 BACKGROUND

This appendix presents results of settlement analyses and evaluation of liquefaction potential of tailings for the Energy Fuels Resources (USA) Inc. (EFRI) White Mesa Uranium Mill tailings disposal cells. These analyses are an update to the settlement and liquefaction analyses presented in MWH (2011) to address State of Utah, Division of Waste Management and Radiation Control (DWMRC) (formerly Utah Division of Radiation Control, DRC) interrogatories (DRC, 2012) and review comments on EFRI responses to 2012 interrogatories (DRC, 2013). These analyses also incorporate (1) the revised cover grading design, (2) results of cover material testing conducted in 2010 and 2012 (summarized in Attachment B of EFRI, 2012), (3) results of the recent site-specific probabilistic hazard analysis (presented in MWH, 2015a), (4) results of tailings testing conducted in 2013 (presented in MWH, 2015b), and (5) updated calculation methods for the seismic settlement and liquefaction potential.

Settlement analyses were conducted to evaluate settlement due to placement of final cover, dewatering of the tailings cells, long-term static (creep) settlement, and seismically induced (seismic) settlement. The results of these analyses were used to evaluate differential settlement and the potential for cover cracking. The settlement analyses are discussed in Section F.2. The tailings cells were also evaluated for liquefaction potential and discussion is provided in Section F.3.

The monolithic ET cover system evaluated in this appendix consists of the following layers from top to bottom:

- 0.5 ft (15 cm) Erosion Protection Layer (gravel-admixture)
- 3.5 ft (107 cm) Water Storage/Biointrusion/Frost Protection/Radon Attenuation Layer (loam to sandy clay)
- 3.0 to 4.0 ft (91 to 122 cm) Radon Attenuation Layer (highly compacted loam to sandy clay)
- 2.5 ft (75 cm) Radon Attenuation and Grading Layer (loam to sandy clay)

F.2 SETTLEMENT ANALYSES

F.2.1 Method of Analyses

General. One-dimensional (1-D) settlement analyses were conducted for the tailings in Cells 2 and 3 to estimate total potential future settlement of the tailings after placement of the final cover. The cone penetration testing (CPT) locations from the October 2013 tailings investigation (MWH, 2015b) were selected as the locations for the settlement analyses. The CPT locations are shown on Figure F.1, along with the settlement monument locations. All CPT locations were adjacent to settlement monuments.

The settlement analyses were conducted for two time periods as described below.

1. Settlement during active maintenance. This settlement was calculated as the settlement due to placement of the final cover and dewatering. Water levels during

active maintenance were assumed to be drawn down from water level elevations presented in MWH (2015b) for the October 2013 tailings elevation to five feet above the liner. EFRI proposes to dewater the tailings during active maintenance and draw down the water levels within Cells 2 and 3 such that there are no issues with cover stability. This water level has been assumed as 5 feet for these analyses. Once dewatering to this water level has been completed, remaining primary consolidation due to placement of the cover will be very small.

2. Settlement after active maintenance. This settlement was calculated as the sum of settlement due to creep and seismic settlement. The water level within the tailings was assumed to be located five feet above the liner after active maintenance based on EFRI's plan for dewatering during active maintenance for Cells 2 and 3.

1-D Column Geometry. Vertical soil profiles presented in MWH (2015b) for each CPT location were used in the 1-D consolidation analyses, with the water levels presented in that report being used for initial pore pressure conditions. This assumption is considered conservative since water levels will continue to decrease due to dewatering prior to final cover placement. Cover thicknesses are based on the cover design as listed above, with total cover thicknesses of 10.5 and 10 feet for Cells 2 and 3, respectively. The stress state for the layers within each column is calculated at the midpoint of each tailings layer. Additional vertical column geometry details are provided in Attachment F.1.

Total Settlement During Active Maintenance. Settlement during active maintenance is assumed to be due to primary consolidation caused by cover loading and dewatering (i.e. creep and initial compression are neglected). Settlement is calculated using the following equation:

$$S = \frac{C_c H}{1 + e_0} \log \frac{\sigma'_f}{\sigma'_i}$$

Where:

S = settlement

C_c = compression index

H = thickness of tailings layer (ft)

e_i = initial void ratio of tailings

σ'_i = initial average effective overburden pressure (psf)

σ'_f = final effective vertical pressure (psf)

Total Settlement After Active Maintenance. Settlement after active maintenance is completed is assumed to be due to creep and seismic settlement.

Creep Settlement. Creep settlement was calculated using the method presented in Holtz and Kovacs (1981) and assuming a typical value for the ratio of the secondary compression index to the compression index (C_{α}/C_c) of 0.02 based on the upper bound average C_{α} estimated from laboratory testing on sand-slime and slime tailings (MWH, 2015b). The secondary settlements are based on a time period of 1,000 years.

Seismic Settlement. Seismic settlement was estimated using methods presented in Stewart et al. (2004), and seismic parameters presented in the site-specific probabilistic seismic hazard analysis for the site (MWH, 2015a). The mean peak ground acceleration (PGA) for reclaimed

(long-term) conditions is 0.15 g for an average return period of 10,000 years. The mean seismic source is from a magnitude 5.5 event occurring 20 km from the site. The equations used from Stewart et al. (2004) are provided below.

Shear strain and related equations:

$$\gamma = \frac{1 + g_1 \cdot e^{g_2 \cdot P}}{1 + g_1} P \cdot 100 \text{ (units of \%)}$$

$$\text{PI} \approx 0: \quad g_1 = 0.199 \cdot (\sigma' / p_a)^{0.231} \quad g_2 = 10850 \cdot (\sigma' / p_a)^{-0.410}$$

$$\text{PI} \approx 15: \quad g_1 = 0.194 \cdot (\sigma' / p_a)^{0.265} \quad g_2 = 7490 \cdot (\sigma' / p_a)^{-0.418}$$

$$\text{PI} \approx 30: \quad g_1 = 4.0 \quad g_2 = 1400$$

$$\gamma_{\text{eff}} \frac{G_{\text{eff}}}{G_{\text{max}}} = \frac{0.65 \cdot \text{PHA} \cdot \sigma_0 \cdot r_d}{g \cdot G_{\text{max}}} \equiv P$$

Where:

γ : shear strain

PI: plasticity index

σ' : effective stress

p_a : atmospheric pressure (calculated for an average elevation of 5,600 feet for the site)

G_{eff} : effective shear modulus

G_{max} : small strain shear modulus

PHA: peak horizontal acceleration

σ_0 : total overburden pressure

r_d : reduction factor, ratio of actual shear stress at depth vs. theoretical "rigid body" shear stress

g : acceleration due to gravity

Volumetric strain at 15 cycles equation:

$$\varepsilon_{v, N=15} = a(\gamma_c - \gamma_r)^b$$

Where:

$\varepsilon_{v, N=15}$: volumetric strain at 15 cycles

a , b , and γ_{tr} : material-specific constants (estimated based on relative compaction, soil type, fines content, and plasticity using Figures 6.5 – 6.7 in Stewart et. al, 2004)

γ_c : shear strain (same as shear strain, γ , listed above)

Volumetric strain for design event:

$$\begin{aligned}\varepsilon_v &= \varepsilon_v, N=1.5 * C_N^2 \\ C_N &= R \ln(N) + c \\ c &= 1 - \ln(15) \times R \\ N &= \frac{\left(\frac{\exp(b_1 + b_2(m - m^*))}{10^{1.5m+16.05}} \right)^{\frac{1}{3}}}{4.9 \cdot 10^6 \beta} + Sc_1 + rc_2\end{aligned}$$

Where:

ε_v : volumetric strain for design event

C_N : normalized vertical strain

R : slope parameter (estimated as 0.36, 0.32, and 0.34 for soils with non-plastic fines, soils with low-plasticity fines, and soils with medium plasticity fines, respectively, as presented in Stewart et al., 2004 pages 86 through 89)

N : equivalent number of uniform strain cycles

c : slope parameter estimated from equation listed above

b_1 : 1.53 (Stewart et al., 2004)

b_2 : 1.51 (Stewart et al., 2004)

c_1 : 0.75 (Stewart et al., 2004)

c_2 : 0.095 (Stewart et al., 2004)

β : 3.2 (Stewart et al., 2004)

m^* : 5.8 (Stewart et al., 2004)

m : design earthquake magnitude

r : site-source distance (km)

S : equal to 0 if rock or shallow soil (<20m) underlies the fill and 1 if >20m underlies the fill

F.2.2. Material Properties

EFRI conducted a tailings investigation of Cells 2 and 3 in October 2013 at the White Mesa Mill site to collect site-specific tailings data to supplement existing tailings data used for the settlement analyses. The results are presented in MWH (2015b). The tailings profiles and properties used for the settlement analyses are based on the results presented in MWH (2015b). Parameters used for the cover materials are based on cover material testing conducted in 2010 and 2012 (summarized in Attachment B of EFRI, 2012). Parameters used for the settlement analyses are summarized in Table F.1 and discussed in the following paragraph. Additional detail on soil properties and consolidation parameters used in the analyses are provided in Attachments F.1 through F.3.

Table F.1 Summary of Soil Parameters used for Settlement Analyses

Material Type	Initial Dry Density (pcf)	Specific Gravity	Initial void Ratio, e	Average Percent Passing No. 200 Sieve (%)	Compression Index, C_c	Secondary Compression Index, C_{α}
Erosion Protection Layer (topsoil)	100 ¹	2.61 ¹	0.61 ²	51 ¹	0.14 ³	NA
Erosion Protection Layer (rock mulch)	106 ¹	2.62 ¹	0.54 ²	45 ¹	0.14 ³	NA
Evapotranspiration Cover Layer	100 ¹	2.63 ¹	0.64 ²	51 ¹	0.14 ³	NA
High-Compaction Cover Layer	112 ¹	2.63 ¹	0.46 ²	51 ¹	0.14 ³	NA
Platform Fill/Interim Cover	94 ¹	2.63 ¹	0.74 ²	51 ¹	0.14 ³	NA
Sand Tailings	97 ⁵	2.70 ⁵	0.74 ²	18 ⁵	0.12 ⁶	0.002 ⁴
Sand-Slime Tailings	88 ⁵	2.80 ⁵	0.99 ²	47 ⁵	0.24 ⁵	0.005 ⁴
Slime Tailings	78 ⁵	2.86 ⁵	1.29 ²	71 ⁵	0.28 ⁵	0.006 ⁴

¹From laboratory values presented in EFRI (2012)

²Calculated value

³ Calculated from empirical equation for soil types similar to cover material (as presented in Holtz and Kovacs, 1981).

⁴ Estimated from laboratory results presented in MWH (2015b), upper bound average C_{α} for sand-slime and slime tailings of 0.02

⁵From laboratory results presented in MWH (2015b)

⁶Based on lab testing performed on uranium tailings sands and presented in Keshian and Rager (1988)

Additional assumptions for soil parameters used in the analyses are provided below.

- For the consolidation, dewatering, and creep settlement analyses, the moist unit weight for all tailings layers (saturated and unsaturated) was estimated as the saturated unit weight which results in a conservative estimate of loading.
- For the consolidation, dewatering, and creep settlement analyses, properties of the layers of tailings between the liner and the bottom of the CPT depth were estimated as sand-slime tailings. The sand-slime tailings comprise approximately 65 percent of the total tailings in Cells 2 and 3.
- For calculating loading conditions for seismic settlement and evaluation of liquefaction, the moist unit weight for unsaturated tailings layers were estimated based on the long-term moisture content of the tailings as presented in the radon emanation modeling.
- Initial stress conditions for liquefaction analyses were estimated using CPT data from MWH (2015b) assuming the initial conditions in the future will be the same as in October 2013. This is conservative as it does not account for the effects of consolidation and aging that will occur in the tailings during the active maintenance period. For the seismic settlement analyses of Cell 3, the average shear wave velocities with depth measured for Cell 2 tailings were used in the analyses to partially account for consolidation and aging that will occur during this period. These values range from 460 to 600 feet per second. Tailings in Cell 2 were placed earlier than Cell 3 and have been actively dewatered since 2009. This use of the shear wave velocities measured in October 2013 is conservative for these analyses for both tailings cells since further densification of the tailings will occur during the active maintenance period.

F.2.3 Results

As discussed previously, settlement analyses were conducted for two time periods to estimate future settlement (1) settlement during active maintenance due to final cover placement and dewatering, and (2) settlement after active maintenance due to creep and seismic settlement. The results are summarized in Tables F.2 and F.3 and Figures F.2 and F.3. The spreadsheet calculations of are provided in Attachments F.1 (settlement due to dewatering of tailings and placement of final cover), F.2 (creep settlement), and F.3 (seismic settlement). Total settlement during active maintenance is conservatively estimated to range from 0.9 to 1.6 feet. Total remaining settlement due to dewatering from 5 feet above the liner to the liner is approximately 0.01 feet. Total potential future settlement due to creep is estimated to range from 0.05 to 0.09 feet, and due to seismic settlement is estimated to range from 0.23 to 0.62 feet. The total potential future long-term settlement due to creep and seismic settlement of the tailings is estimated to range from 0.29 to 0.71 feet. The estimates of total long term settlement were calculated by summing the static creep settlement estimate and the seismic settlement estimates. As such, these estimates are considered to be somewhat conservative as they are not independent (i.e. as long-term static creep progresses, void ratio reduction will occur and the potential for seismic settlement will reduce over time as a result).

Table F.2 Future Settlement During Active Maintenance

Location	Settlement due to Consolidation and Dewatering Prior to t_1 (ft)
2W2	1.09
2W3	1.15
2W4-C	1.29
2W5-C	1.26
2W6-S	1.29
2W7-C	1.17
2E1	1.30
3-1S	0.88
3-2C	1.19
3-3S	1.47
3-4N	1.56
3-6N	1.34
3-8N	1.03
3-8S	1.06

Notes:

t_1 corresponds to dewatering of the tailings to a level 5 feet above the liner

Table F.3 Future Settlement After Active Maintenance

Location	Settlement due to 1000 years of Creep (ft)	Seismic Settlement (ft)	Total Potential Future Settlement after Active Maintenance (ft)
2W2	0.06	0.35	0.41
2W3	0.05	0.36	0.42
2W4-C	0.05	0.43	0.48
2W5-C	0.07	0.49	0.56
2W6-S	0.06	0.48	0.54
2W7-C	0.06	0.35	0.40
2E1	0.07	0.47	0.54
3-1S	0.05	0.23	0.29
3-2C	0.05	0.40	0.45
3-3S	0.09	0.41	0.50
3-4N	0.09	0.62	0.71
3-6N	0.06	0.54	0.60
3-8N	0.05	0.34	0.39
3-8S	0.08	0.35	0.43

F.2.4 Differential Settlement and Cover Cracking Potential

Differential Settlement. After placement of the final cover and during active maintenance, additional fill may be placed in any low areas to maintain positive drainage of the cover surface. Therefore, the critical time period where differential settlement is a concern for the cover grading (i.e. potential for slope reversal) is after active maintenance is complete. Potential maximum future settlement after active maintenance is estimated as 0.29 to 0.71 feet. Based on the settlement analyses results as shown on Figure F.2, the critical location for the ratio of maximum differential settlement over distance is estimated to occur between the CPT location 3-3S and the dike between Cells 3 and 4A (conservatively assuming no settlement of the dike fill). Although the differential settlement is higher between CPT location 3-4N and 3-6N and the dike between Cells 2 and 3, differential settlement at these location would result in an increase in cover slope, therefore the former location is more critical for slope reversal. Locations on Cell 2 with higher settlement (2W4-C, 2W5-C, 2W6-S) than the 3-3S location are located within the center of Cell 2, however the highest differential settlement associated with these points is lower than the selected critical case.

The total potential differential settlement between 3-3S and the dike between Cells 3 and 4A is 0.50 feet over a distance of approximately 175 feet. The estimated differential settlement is sufficiently low such that ponding and slope reversal is not expected to occur. These calculations are based on conservative assumptions for seismic settlement with little to no credit taken for densification of tailings prior to placement of final cover and during active maintenance of the tailings cells. In addition, as mentioned above, creep and seismic settlement are not independent, however they have been treated as such in the calculations. Actual differential settlement for long-term (after active maintenance) conditions is expected to be lower.

Cover Cracking. Cover cracking analyses were performed for the highly-compacted radon barrier. The critical location for the cover cracking analyses for maximum differential settlement due to final cover placement, dewatering of tailings, creep, and a seismic event is 2.27 feet between the settlement monument 3-4N and dike between Cells 2 and 3 as shown on Figure F.3. This location has the maximum differential settlement over the shortest horizontal distance. The maximum differential settlement, assuming there is no settlement of the dike, is 2.27 feet. The horizontal distance between the two locations is approximately 150 feet.

Morrison-Knudsen Environmental Corporation (1993) presents a method for determining the tensile strain required to cause cracking of the radon barrier as a function of the plasticity index (PI) of the soil. The tensile strain at cracking is calculated by the equation below:

$$\varepsilon_f(\%) = 0.05 + 0.003 \times (PI)$$

where: $\varepsilon_f(\%)$ = tensile strain to cause cracking of the radon barrier
PI = plasticity index of radon barrier

The PI value for the highly compacted radon attenuation layer was estimated as the weighted average (based on soil volumes) of the measured PIs (11) for composite samples collected during the 2010 and 2012 borrow investigations (see Attachment B of EFRI, 2012). Using this value for PI, the minimum tensile strain that will induce cracking is 0.08 percent. The maximum settlement-induced horizontal tensile strain on the radon attenuation layer must be less than 0.08 percent so that cover cracking will not occur.

The horizontal movement at the top of the radon barrier can be calculated based on the following equation (Lee and Shen, 1969), which is referenced in NUREG 1620 (NRC, 2003) for cover cracking analysis:

$$m = \frac{2}{3} H \alpha$$

where: m = horizontal movement in feet
 H = thickness of relatively incompressible material (in this analysis H is the thickness of the highly compacted radon barrier)
 α = local slope of the settlement profile (expressed as decimal fraction)

Horizontal movement at the maximum tailing thickness is calculated to be 0.035 feet using a maximum thickness of relatively incompressible material of 3.5 feet, and a total differential settlement of 2.27 feet over 150 feet. The thickness of relatively incompressible material was estimated assuming a maximum 3.5-ft highly compacted radon barrier for Cell 3. The peak horizontal movement is assumed to be twice the average horizontal movement based on relationships presented in Gourc et al. (2010) and Rajesh and Viswanadham (2010). The peak horizontal movement is then calculated as 0.07.

The horizontal strain between any two settlement monitoring locations is the maximum horizontal movement divided by the horizontal distance (0.07 ft/150 ft). Using these values, the maximum horizontal strain is calculated as 0.05 percent. This value is lower than the maximum allowable strain of 0.08 percent and indicates that cracking of the radon attenuation layer due to settlement is not expected.

F.3 LIQUEFACTION ANALYSIS

F.3.1 Method of Analysis

Two procedures were used to evaluate the potential for liquefaction of the tailings based on the results of the CPT soundings. These methods (Idriss and Boulanger, 2008; Youd et al., 2001) are described below. The average factor of safety calculated from the two methods was used as the factor of safety for evaluating the liquefaction potential of the tailings.

Idriss and Boulanger (2008). The Idriss and Boulanger (2008) liquefaction triggering method estimates the cyclic stress ratio (CSR) based on the seismic design criteria and estimates the cyclic resistance ratio (CRR) based on the CPT readings and site conditions. CSR is calculated using a simplified procedure to estimate earthquake induced stresses, calculated using the following relationship:

$$CSR_{M=7.5, \sigma'_{vc}=1} = 0.65 \frac{a_{max}}{g} \frac{\sigma_{vc}}{\sigma'_{vc}} \frac{1}{MSF} \frac{1}{K_{\sigma}} \frac{1}{K_{\alpha}}$$

Where:

a_{max} : maximum horizontal ground surface acceleration

σ_{vc} : effective vertical confining stress

σ'_{vc} : total vertical confining stress

MSF: earthquake magnitude scaling factor

K_{σ} : overburden correction factor

K_{α} : static shear stress correction factor

g : acceleration due to gravity

The equations for the correction factors applied to the CSR for this evaluation are the following:

$$\begin{aligned} r_d &= \exp(\alpha(z) + \beta(z)M) \\ \alpha(z) &= -1.012 - 1.126 \sin\left(\frac{z}{11.73} + 5.133\right) \\ \beta(z) &= 0.106 + 0.118 \sin\left(\frac{z}{11.28} + 5.142\right) \\ MSF &= 6.9 \exp\left(\frac{-M}{4}\right) - 0.058 \leq 1.8 \\ K_{\sigma} &= 1 - C_{\sigma} \ln\left(\frac{\sigma'_{vc}}{P_a}\right) \leq 1.1 \\ C_{\sigma} &= \frac{1}{37.3 - 8.27(q_{c1N})^{0.264}} \leq 0.3 \end{aligned}$$

Where:

r_d : shear stress reduction coefficient

q_{c1N} : tip resistance normalized to atmospheric pressure and overburden pressure

z : depth below ground surface

P_a : atmospheric pressure (calculated for an average elevation of 5,600 feet for the site)
 M : design earthquake magnitude

The tailings pile was evaluated assuming essentially flat ground, and ignored the effects of the slope at the edge of the tailings pile. Thus, a static shear stress correction factor of $K_\alpha=1$ was used for all calculations.

The relationship for CRR is based on liquefaction case histories and is expressed as:

$$CRR_{M=7.5, \sigma'_{vc}=1} = \exp \left(\frac{q_{c1Ncs}}{540} + \left(\frac{q_{c1Ncs}}{67} \right)^2 - \left(\frac{q_{c1Ncs}}{80} \right)^3 + \left(\frac{q_{c1Ncs}}{114} \right)^4 - 3 \right)$$

Where:

q_{c1Ncs} : equivalent clean-sand corrected normalized tip resistance

$$q_{c1Ncs} = q_{c1N} + \Delta q_{c1N}$$

$$\Delta q_{c1N} = \left(5.4 + \frac{q_{c1N}}{16} \right) \cdot \exp \left(1.63 + \frac{9.7}{FC + 0.01} - \left(\frac{15.7}{FC + 0.01} \right)^2 \right)$$

FC = Fines Content in %

The factor of safety against liquefaction was computed as:

$$FS_{liq} = \frac{CRR_{M=7.5, \sigma'_{vc}=1}}{CSR_{M=7.5, \sigma'_{vc}=1}}$$

The correlation between CSR, CRR, and q_{c1N} is shown in Figure 67 of Idriss and Boulanger (2008).

Youd et al. (2001). The Youd et al. (2001) liquefaction triggering method estimates the CSR based on the seismic design criteria and estimates the CRR based on the CPT readings and site conditions. CSR is calculated using a simplified procedure to estimate earthquake induced stresses, calculated using the following relationship:

$$CSR_{M=7.5, \sigma'_{vc}=1} = 0.65 \frac{a_{max}}{g} \frac{\sigma_{vc}}{\sigma'_{vc}} \frac{1}{MSF} \frac{1}{K_\sigma} \frac{1}{K_\alpha}$$

Where:

a_{max} : maximum horizontal ground surface acceleration

σ_{vc} : effective vertical confining stress

σ_{vc} : total vertical confining stress

r_d : shear stress reduction coefficient

MSF: earthquake magnitude scaling factor
K_σ: overburden correction factor
K_α: static shear stress correction factor
g: acceleration due to gravity

The equations for the correction factors applied to the CSR for this evaluation are the following:

$$\begin{aligned}
 r_d &= 1.0 - 0.00765z \quad \text{for } z \leq 9.15 \text{ m} \\
 r_d &= 1.174 - 0.0267z \quad \text{for } 9.15 \text{ m} < z \leq 23 \text{ m}
 \end{aligned}$$

Revised Idriss Scaling Factor: $MSF = 10^{2.24/M_w^{2.56}}$

$$K_\sigma = (\sigma'_{vo}/P_a)^{f-1}$$

Where:

z: Depth below ground surface
M_w: Design earthquake magnitude
P_a: Atmospheric Pressure
σ_{vo}': effective vertical overburden pressure
f=0.7 to 0.8 for 40% ≤ relative density, *D_r* ≤ 60%
 0.6 to 0.7 for 60% < relative density, *D_r* ≤ 80%

$$D_r = \sqrt{\frac{q_{c1n}}{300}}$$

The tailings pile was evaluated assuming flat ground conditions. Thus, a static shear stress correction factor of *K_σ*=1 was used for all calculations.

The relationship for CRR is based on liquefaction case histories and is expressed as:

$$\begin{aligned}
 \text{If } (q_{c1N})_{cs} < 50 \quad CRR_{7.5} &= 0.833[(q_{c1N})_{cs}/1,000] + 0.05 \\
 \text{If } 50 \leq (q_{c1N})_{cs} < 160 \quad CRR_{7.5} &= 93[(q_{c1N})_{cs}/1,000]^3 + 0.08
 \end{aligned}$$

Where:

$$\begin{aligned}
 q_{c1Ncs} &= K_c * q_{c1N} \\
 \text{for } I_e &\leq 1.64 \quad K_c = 1.0 \\
 \text{for } I_e &> 1.64 \quad K_c = -0.403I_e^4 + 5.581I_e^3 - 21.63I_e^2 \\
 &\quad + 33.75I_e - 17.88
 \end{aligned}$$

The factor of safety against liquefaction was computed as:

$$FS_{liq} = \frac{CRR_{M=7.5, \sigma'_{vc}=1}}{CSR_{M=7.5, \sigma'_{vc}=1}}$$

The correlation between CSR, CRR, and q_{c1N} is shown in Figure 4 of Youd et al. (2001).

F.3.2. Material Properties

Liquefaction evaluation was performed for all CPT locations from the October 2013 tailings investigation (MWH, 2015b). The liquefaction evaluation used the same assumptions for soil profile, water table elevation, and density of the tailings material as described above for the long-term settlement analyses. Other parameters used for the evaluation were based on CPT data as presented in Attachment F.4 and as outlined in Idriss and Boulanger (2008) and Youd et al. (2001). It is assumed that the compacted cover materials are not susceptible to liquefaction and therefore were not included in the analyses.

F.3.3. Site Seismicity

Results of the site-specific probabilistic seismic hazard analysis presented in MWH (2015a) were used in the analysis of liquefaction potential. The mean peak ground acceleration for reclaimed (long-term) conditions is 0.15 g for an average return period of 10,000 years. The mean seismic source is from a magnitude 5.5 event occurring 20 km from the site.

F.3.4 Results

Table F.4 presents a summary of the results of the liquefaction analysis. Further details of the calculation can be found in Attachment F.4.

Table F.4 Summary of Liquefaction Results

Location	Minimum Factor of Safety
2W2	2.58
2W3	2.37
2W4-C	2.11
2W5-C	2.08
2W6-S	2.24
2W7-C	2.10
2E1	1.96
3-1S	2.41
3-2C	2.59
3-3S	2.36
3-4N	2.46
3-6N	2.30
3-8N	2.84
3-8S	2.38

Based on the factors of safety presented in Table F.4, the tailings are judged not to be susceptible to earthquake-induced liquefaction. The computed factors of safety against liquefaction range from 2.0 to 2.6.

F.4 CONCLUSIONS

Evaluation total settlement due to final cover placement and dewatering indicates potential future settlement during the active maintenance to range from approximately 0.9 to 1.6 feet. During this time, additional fill can be placed in any low areas in order to maintain positive drainage of the cover surface. The total predicted future long-term settlement that could occur (due to creep and seismic settlement) after the maintenance time period is complete is estimated to range from approximately 0.3 to 0.7 feet. The estimates of total long-term settlement were calculated by summing the static creep settlement estimate and the seismic settlement estimates. As such, these estimates are considered to be somewhat conservative as they are not independent (i.e. as long-term static creep progresses, void ratio reduction will occur and the potential for seismic settlement will reduce over time as a result). The estimated differential settlement after completion of active maintenance is sufficiently low that slope reversal and ponding is not expected to occur on a cover slope of 0.5 to 1.0 percent. In addition, the results indicate that cracking of the highly-compacted radon barrier due to settlement-induced strains is not expected. The results of the liquefaction analyses indicate the tailings are not susceptible to earthquake-induced liquefaction.

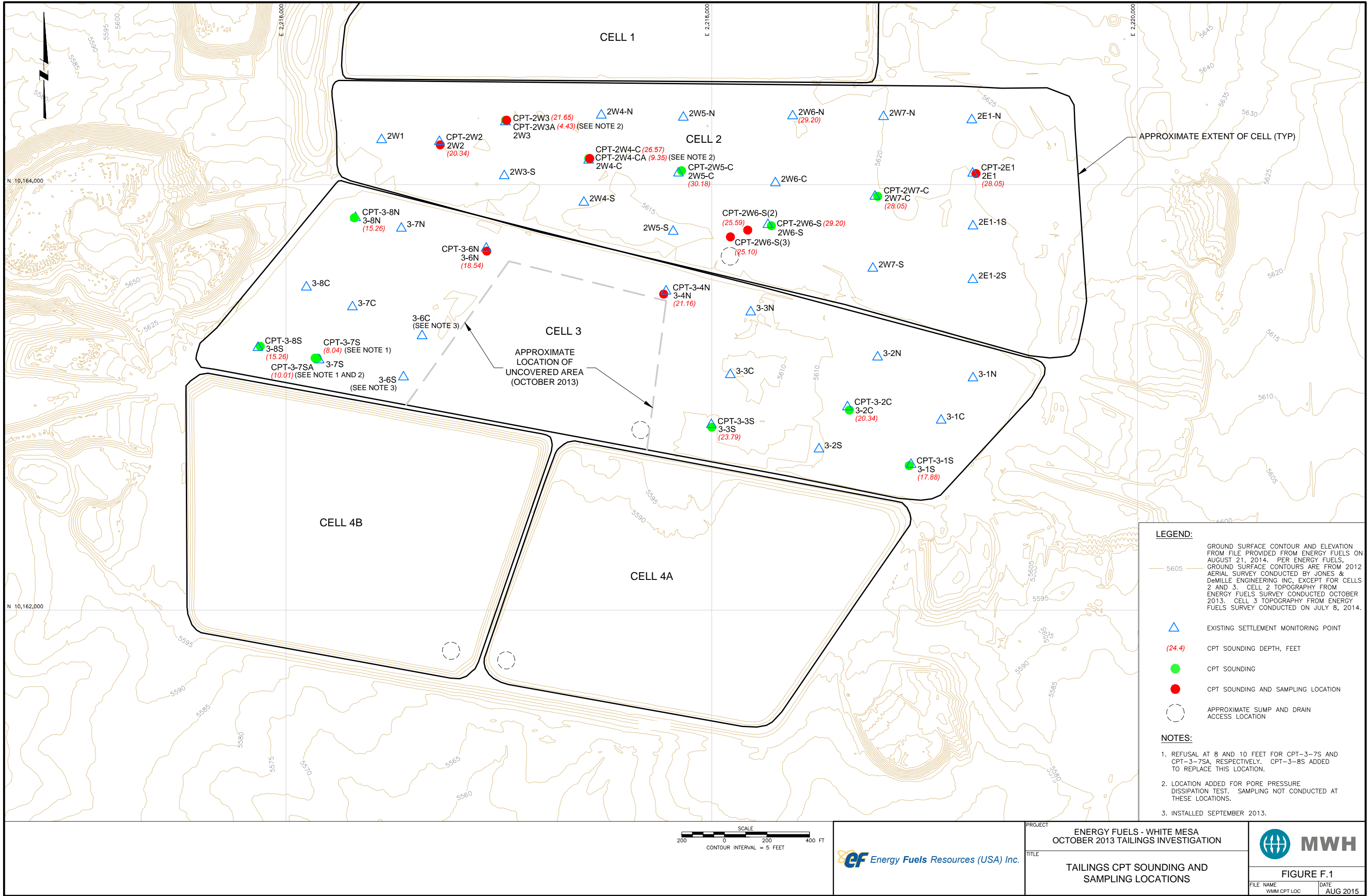
Similar results are expected for Cells 4A and 4B. Although Cells 4A and 4B have higher tailings thicknesses, these cells have a more effective dewatering systems and a low water level requirement for dewatering. These cells also have a slightly steeper average cover slope (approximately 0.8 percent) than Cells 2 and 3.

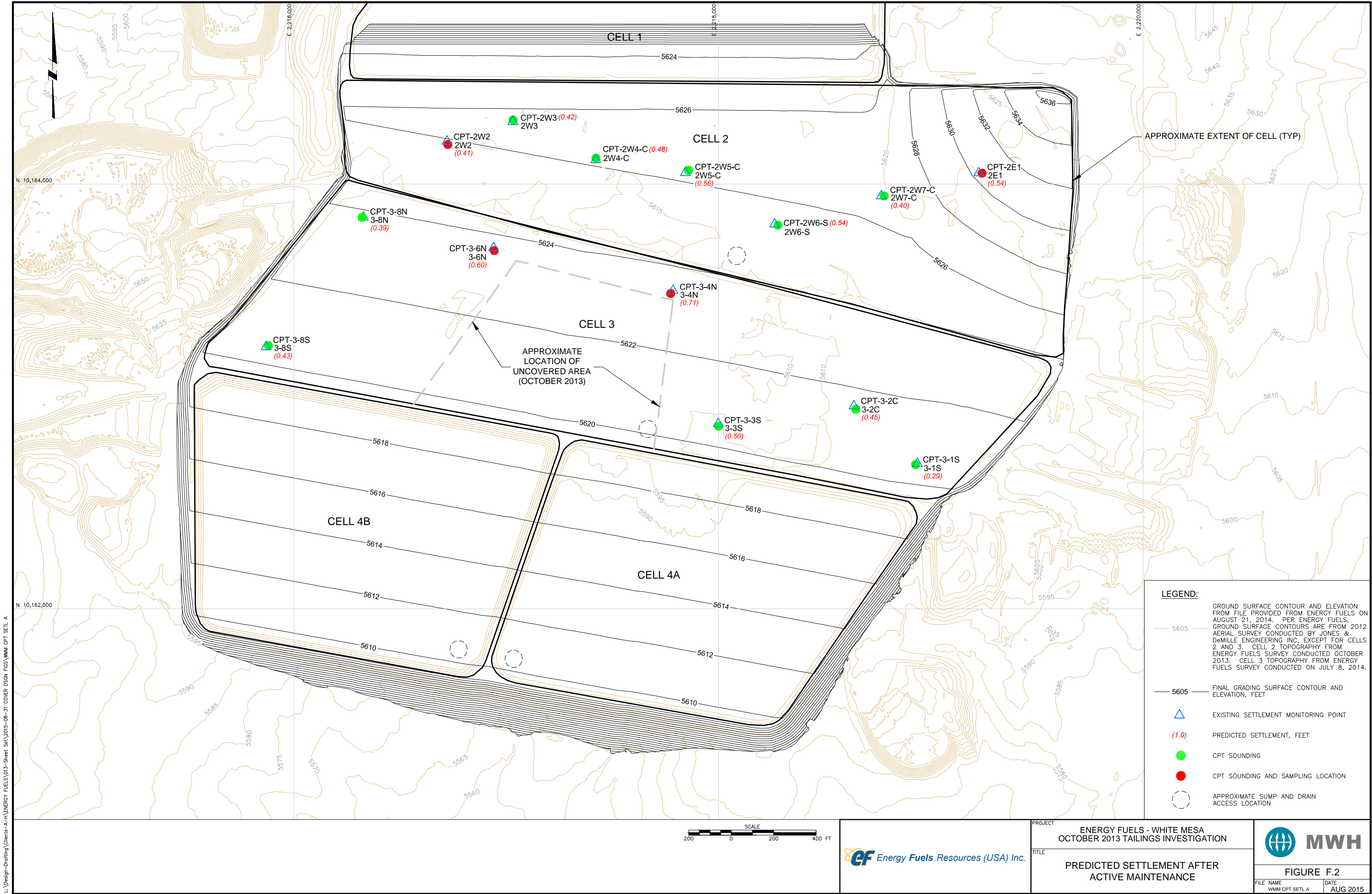
F.5 REFERENCES

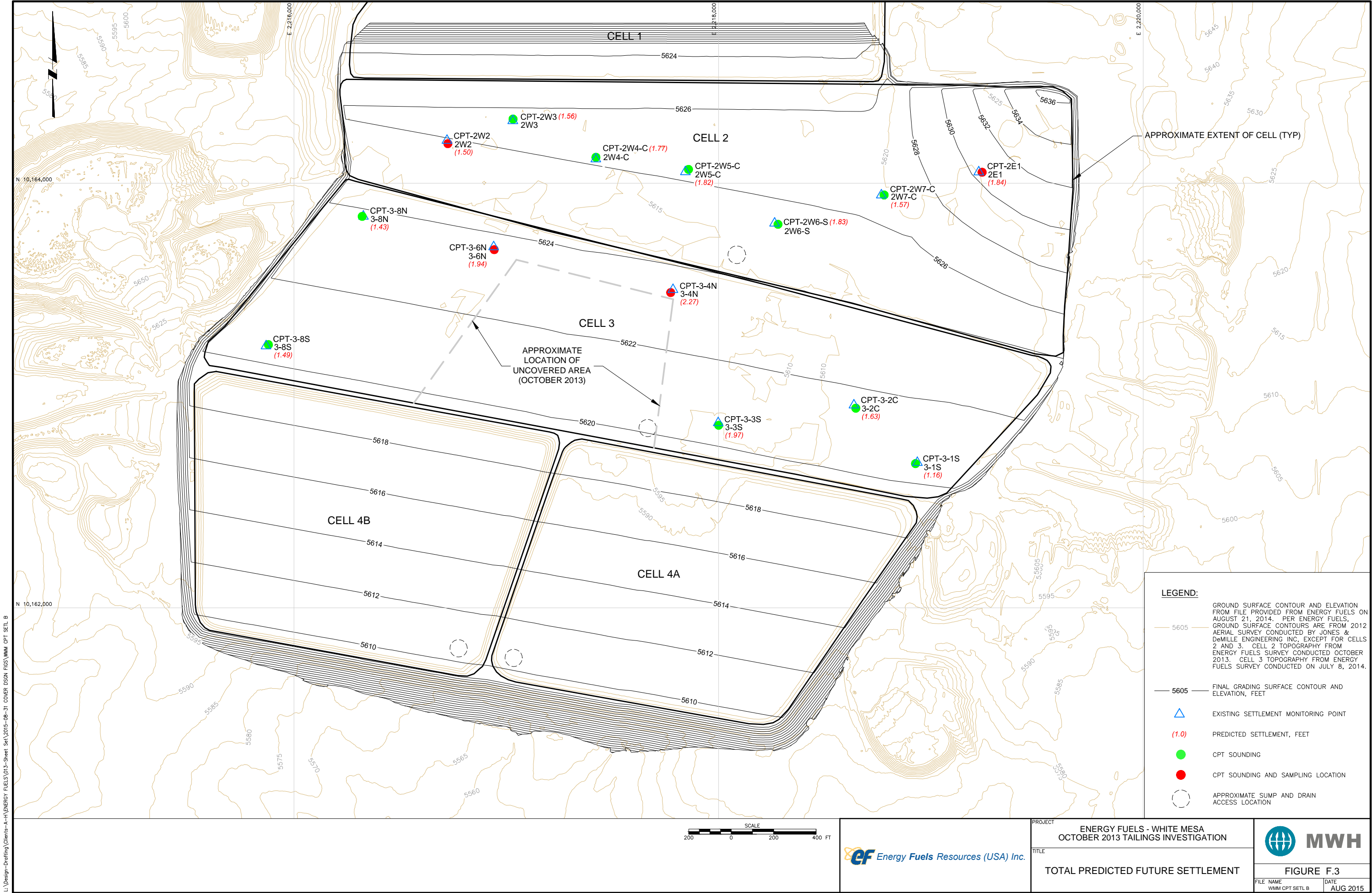
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L:\Design-Drafting\Clients-A\HYDRO ENERGY FUELS\013-Sheet Set\2015-08-31 COVER DSGN FIGS\WMM CPT LOC







ATTACHMENT F.1**SETTLEMENT CALCULATIONS FOR SETTLEMENT DUE TO DEWATERING THE
TAILINGS AND PLACMENT OF THE FINAL COVER**

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Notes

t_0 corresponds to beginning of final cover placement
 t_1 corresponds to dewatering of the tailings to a level 5 feet above the liner
 t_2 corresponds to completion of dewatering

Assumes 99% of consolidation due to existing stress conditions has taken place

SOIL PROPERTIES

TAILINGS

Specific Gravity, G_s

2.70	Specific gravity of tailing sands, $G_{s-TS_{sand}}$	Based on lab testing performed on uranium tailings sands and presented in Keshian and Rager (1988)
2.80	Specific gravity of tailing sand-slimes, G_{s-TS-S}	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015)
2.86	Specific gravity of tailing slimes, $G_{s-TS_{lime}}$	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015)

Fines Content

18%	Fines content of tailings sands (%)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015)
47%	Fines content of tailings sand-slimes (%)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015)
71%	Fines content of tailings slimes (%)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015)

Dry Unit Weight, γ_d

97	In-situ dry unit weight of tailings sands at t_i , $\gamma_{d0-TS_{sand}}$ (pcf)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015)
88	In-situ dry unit weight of tailings sand-slimes at t_i , $\gamma_{d0-TS-S}$ (pcf)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015)
78	In-situ dry unit weight of tailings slimes at t_i , $\gamma_{d0-TS_{lime}}$ (pcf)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015)

Saturated Unit Weight, γ_{sat}

123	In-situ saturated unit weight of tailings sands at t_i , $\gamma_{sat0-TS_{sand}}$ (pcf)	Calculated
119	In-situ saturated unit weight of tailings sand-slimes at t_i , $\gamma_{sat0-TS-S}$ (pcf)	Calculated
113	In-situ saturated unit weight of tailings slimes at t_i , $\gamma_{sat0-TS_{lime}}$ (pcf)	Calculated

Moist Unit Weight, γ_m

123	Moist unit weight of tailings sands, $\gamma_{m-TS_{sand}}$ (pcf)	Calculated, assuming 100% degree of saturation (conservative estimate of loading from these layers)
119	Moist unit weight of tailings sand-slimes, γ_{m-TS-S} (pcf)	Calculated, assuming 100% degree of saturation (conservative estimate of loading from these layers)
113	Moist unit weight of tailings slimes, $\gamma_{m-TS_{lime}}$ (pcf)	Calculated, assuming 100% degree of saturation (conservative estimate of loading from these layers)

Void Ratio, e

0.74	Void ratio of tailing sands at t_i , $e_{0-TS_{sand}}$	Calculated
0.99	Void ratio of tailing sand-slimes at t_i , e_{0-TS-S}	Calculated
1.29	Void ratio of tailing slimes at t_i , $e_{0-TS_{lime}}$	Calculated

Saturated Water Content, w_{sat}

27%	Saturated water content of tailings sands at t_i , $w_{sat0-TS_{sand}}$ (%)	Calculated
35%	Saturated water content of tailings sand-slimes at t_i , $w_{sat0-TS-S}$ (%)	Calculated
45%	Saturated water content of tailings slimes at t_i , $w_{sat0-TS_{lime}}$ (%)	Calculated

Water Content of Moist Tailings, w_{m-T}

27%	Water content of moist tailings sands, $w_{m-TS_{sand}}$ (%)	Calculated, assuming 100% saturation (conservative value used to estimate loading from these layers, actual long-term water content will be lower)
35%	Water content of moist tailings sand-slimes, w_{m-TS-S} (%)	Calculated, assuming 100% saturation (conservative value used to estimate loading from these layers, actual long-term water content will be lower)
45%	Water content of moist tailings slimes, $w_{m-TS_{lime}}$ (%)	Calculated, assuming 100% saturation (conservative value used to estimate loading from these layers, actual long-term water content will be lower)

Compression Index, C_c

0.12	Compression index of tailings sands, $C_{c-TS_{sand}}$	Based on lab testing performed on uranium tailings sands and presented in Keshian and Rager (1988)
0.24	Compression index of tailings sand-slimes, C_{c-TS-S}	Median value from lab testing of tailings sand-slimes samples obtained on-site (Tailings Data Analysis Report. MWH, 2015)
0.28	Compression index of tailings slimes, $C_{c-TS_{lime}}$	Median value from lab testing of tailings slimes samples obtained on-site (Tailings Data Analysis Report. MWH, 2015)

Other

62.4	Unit Weight of Water, γ_w	
5.0	Height of water table above liner at t_i , H_{sat-1} (ft)	Assumed for end of active maintenance
0.0	Height of water table above liner at t_i , H_{sat-2} (ft)	

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82.4	Atmospheric Pressure, P_a (kPa)	Calculated assuming elev=5600' amsl. http://www.engineeringtoolbox.com/air-altitude-pressure-d_462.html
1722.0	Atmospheric Pressure, P_a (psf)	Unit conversion calculation
5.2%	Long-term moisture content of tailings, $w_{tailings}$ (%)	From Attachment H - Radon Emanation Modeling including with this submittal
0.020	Ratio of Secondary Compression Index to Primary Compression Index, C_c/C_c	Estimated from laboratory results presented in MWH (2015b), upper bound average G_x for sand-slime and slime tailings of 0.02

COVER SOIL

Specific Gravity, G_s		
2.61	Specific gravity of topsoil, $G_{s-topsoil}$	From Attachment H - Radon Emanation Modeling including with this submittal
2.62	Specific gravity of rock mulch, $G_{s-mulch}$	From Attachment H - Radon Emanation Modeling including with this submittal
2.63	Specific gravity of cover soil, $G_{s-cover}$	From Attachment H - Radon Emanation Modeling including with this submittal
Unit Weight, γ		
118.0	Maximum dry unit weight of cover soil $\gamma_{cover-max}$ (pcf)	Average calculated from laboratory testing results (UWM, 2012)
100.7	Moist unit weight of cover soil at 80% relative compaction, $\gamma_{cover80}$ (pcf)	Calculated
107.0	Moist unit weight of cover soil at 85% relative compaction, $\gamma_{cover85}$ (pcf)	Calculated
119.6	Moist unit weight of cover soil at 95% relative compaction, $\gamma_{cover95}$ (pcf)	Calculated
127.5	Saturated unit weight of cover soil at 80% relative compaction, $\gamma_{cover80-sat}$ (pcf)	Calculated
100	Dry unit weight of topsoil layer at 85% relative compaction, $\gamma_{topsoil85}$ (pcf)	From Attachment H - Radon Emanation Modeling including with this submittal
105	Moist unit weight of topsoil layer at 85% relative compaction, $\gamma_{topsoil85}$ (pcf)	Calculated
106	Dry unit weight of rock mulch layer at 85% relative compaction, $\gamma_{mulch85}$ (pcf)	From Attachment H - Radon Emanation Modeling including with this submittal
110	Moist unit weight of rock mulch layer at 85% relative compaction, $\gamma_{mulch85}$ (pcf)	From Attachment H - Radon Emanation Modeling including with this submittal
Void Ratio, e		
0.74	Void Ratio of cover soil at 80% relative compaction, $e_{cover80}$	Calculated
0.64	Void Ratio of cover soil at 85% relative compaction, $e_{cover85}$	Calculated
0.46	Void Ratio of cover soil at 95% relative compaction, $e_{cover95}$	Calculated
0.61	Void Ratio of topsoil at 85% relative compaction, $e_{topsoil85}$	Calculated from porosity presented in Attachment H - Radon Emanation Modeling including with this submittal
0.54	Void Ratio of rock mulch at 85% relative compaction, $e_{mulch85}$	Calculated from porosity presented in Attachment H - Radon Emanation Modeling including with this submittal
Other		
6.7%	Long-term moisture content of cover soil, w_{cover} (%)	Estimated based on measured 15bar water content. (UWM, 2012)
5.2%	Long-term moisture content of topsoil, $w_{topsoil}$ (%)	From Attachment H - Radon Emanation Modeling including with this submittal
4.0%	Long-term moisture content of rock mulch, $w_{rockmulch}$ (%)	From Attachment H - Radon Emanation Modeling including with this submittal
0.14	Compression index of cover soil, $C_c-cover$	Calculated from empirical equation for soil types similar to cover material (as presented in Holtz and Kovacs, 1981. Page 341). $C_c = 0.30*(e_0-0.27)$

Energy Fuels Resources (USA) Inc.
White Mesa Mill
Settlement Analyses

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2W2

FINAL COVER

5625.87	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
4.00	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
2.02	Thickness of Random/Platform Fill on on top of existing interim cover (ft)	Calculated
1111.60	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5613.10	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report, MWH, 2015)
5607.7	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013)
5598.51	Water surface elevation at t_1 (ft amsl)	
5593.51	Water surface elevation at t_2 (ft amsl)	

2W2

CONSOLIDATION SETTLEMENT

Soil Layer	Elevation at Top of Layer at t_0 , z_i , t_0 (ft amsl) ¹	Elevation at Midpoint of Layer at t_0 , z_{i-mid} (ft amsl)	Elevation at Bottom of Layer at t_0 , z_{i-bott} (ft amsl) ¹	Thickness of Layer at t_0 , H (ft)	Material Type ¹	Effective Stress at Midpoint of Layer at t_0 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_0 , σ'_{i-bott} (psf)	Effective Stress at Midpoint of Layer at t_1 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_1 , σ'_{i-bott} (psf)	Effective Stress at Midpoint of Layer at t_2 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_2 , σ'_{i-bott} (psf)	Consolidation of Layer from t_0 to t_1 , due to Final Cover Placement and Dewatering, δ_{c1} , t_1 (ft)	Consolidation of Layer from t_1 to t_2 due to Dewatering, δ_{c2} (ft)
Layer 1	5615.85	5614.30	5612.74	3.11	Int. Cover	156.63	313.25	1268.22	1424.85	1268.22	1424.85	0.23	0.00
Layer 2	5612.74	5612.25	5611.76	0.98	Sand-Slime	371.55	429.85	1483.15	1541.44	1483.15	1541.44	0.07	0.00
Layer 3	5611.76	5611.68	5611.59	0.17	Slime	439.46	449.08	1551.06	1560.68	1551.06	1560.68	0.01	0.00
Layer 4	5611.59	5611.43	5611.27	0.32	Sand	468.83	488.59	1580.43	1600.19	1580.43	1600.19	0.01	0.00
Layer 5	5611.27	5611.19	5611.10	0.17	Sand-Slime	498.70	508.81	1610.30	1620.41	1610.30	1620.41	0.01	0.00
Layer 6	5611.10	5610.69	5610.28	0.82	Slime	555.20	601.58	1666.79	1713.18	1666.79	1713.18	0.05	0.00
Layer 7	5610.28	5610.20	5610.12	0.16	Sand-Slime	611.10	620.61	1722.69	1732.21	1722.69	1732.21	0.01	0.00
Layer 8	5610.12	5609.88	5609.63	0.49	Slime	648.33	676.05	1759.93	1787.64	1759.93	1787.64	0.03	0.00
Layer 9	5609.63	5609.38	5609.13	0.50	Sand-Slime	705.79	735.53	1817.39	1847.13	1817.39	1847.13	0.02	0.00
Layer 10	5609.13	5608.56	5607.99	1.14	Slime	800.02	864.50	1911.61	1976.09	1911.61	1976.09	0.05	0.00
Layer 11	5607.99	5607.83	5607.66	0.33	Sand-Slime	884.13	898.77	1995.73	2015.36	1995.73	2015.36	0.01	0.00
Layer 12	5607.66	5607.25	5606.84	0.82	Slime	919.56	940.36	2061.74	2108.12	2061.74	2108.12	0.04	0.00
Layer 13	5606.84	5606.51	5606.18	0.66	Sand-Slime	959.03	977.70	2147.38	2186.64	2147.38	2186.64	0.03	0.00
Layer 14	5606.18	5605.94	5605.69	0.49	Slime	990.13	1002.56	2214.36	2242.07	2214.36	2242.07	0.02	0.00
Layer 15	5605.69	5605.53	5605.36	0.33	Sand-Slime	1011.89	1021.22	2261.70	2281.33	2261.70	2281.33	0.01	0.00
Layer 16	5605.36	5605.20	5605.03	0.33	Slime	1029.59	1037.96	2300.00	2318.67	2300.00	2318.67	0.01	0.00
Layer 17	5605.03	5604.87	5604.70	0.33	Sand-Slime	1047.30	1056.63	2338.30	2357.93	2338.30	2357.93	0.01	0.00
Layer 18	5604.70	5604.46	5604.21	0.49	Slime	1069.06	1081.49	2385.64	2413.36	2385.64	2413.36	0.02	0.00
Layer 19	5604.21	5604.05	5603.88	0.33	Sand-Slime	1090.82	1100.16	2432.99	2452.62	2432.99	2452.62	0.01	0.00
Layer 20	5603.88	5603.39	5602.90	0.98	Slime	1125.01	1149.87	2508.05	2563.48	2508.05	2563.48	0.04	0.00
Layer 21	5602.90	5602.82	5602.74	0.16	Sand-Slime	1154.40	1158.92	2573.00	2582.52	2573.00	2582.52	0.01	0.00
Layer 22	5602.74	5602.33	5601.92	0.82	Slime	1179.72	1200.52	2628.90	2675.28	2628.90	2675.28	0.03	0.00
Layer 23	5601.92	5601.67	5601.42	0.50	Sand-Slime	1214.66	1228.80	2705.03	2734.77	2705.03	2734.77	0.02	0.00
Layer 24	5601.42	5601.34	5601.26	0.16	Slime	1232.86	1236.92	2743.82	2752.87	2743.82	2752.87	0.01	0.00
Layer 25	5601.26	5601.18	5601.10	0.16	Sand-Slime	1241.45	1245.97	2762.39	2771.91	2762.39	2771.91	0.01	0.00
Layer 26	5601.10	5600.69	5600.28	0.82	Slime	1266.77	1287.57	2818.29	2864.67	2818.29	2864.67	0.03	0.00
Layer 27	5600.28	5599.87	5599.46	0.82	Sand-Slime	1310.76	1333.96	2913.45	2962.23	2913.45	2962.23	0.03	0.00
Layer 28	5599.46	5598.72	5597.98	1.48	Slime	1371.50	1409.03	3045.94	3096.58	3045.94	3129.65	0.06	0.00
Layer 29	5597.98	5597.90	5597.82	0.16	Sand-Slime	1413.56	1418.08	3101.11	3105.63	3139.17	3148.69	0.01	0.00
Layer 30	5597.82	5597.49	5597.16	0.66	Slime	1434.82	1451.56	3122.37	3139.11	3186.02	3223.35	0.03	0.00
Layer 31	5597.16	5596.83	5596.50	0.66	Sand-Slime	1470.23	1488.90	3157.78	3176.45	3262.61	3301.88	0.03	0.00
Layer 32	5596.50	5596.34	5596.18	0.32	Slime	1497.02	1505.13	3184.57	3192.68	3319.98	3338.08	0.01	0.00
Layer 33	5596.18	5595.85	5595.52	0.66	Sand-Slime	1523.80	1542.47	3211.35	3230.02	3377.34	3416.60	0.03	0.00
Layer 34	5595.52	5594.52	5593.51	2.01	Sand-Slime	1599.33	1656.18	3286.88	3343.73	3536.16	3530.31	0.08	0.01

Total Consolidation of Profile at t_1 , δ_{c1} (ft): 1.09

Total Consolidation of Profile at t_2 , δ_{c2} (ft): 0.01

Notes:

¹ From on-site investigation (Tailings Data Analysis Report. MWH, 2015)

2W3

FINAL COVER

5626.27	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
4.00	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
2.55	Thickness of Random/Platform Fill on on top of existing interim cover (ft)	Calculated
1164.98	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5613.80	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report, MWH, 2015)
5607.6	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013)
5597.75	Water surface elevation at t_1 (ft amsl)	
5592.75	Water surface elevation at t_2 (ft amsl)	

2W3

CONSOLIDATION SETTLEMENT

Soil Layer	Elevation at Top of Layer at t_0 , z_i , t_0 (ft amsl) ¹	Elevation at Midpoint of Layer at t_0 , z_{i-mid} (ft amsl)	Elevation at Bottom of Layer at t_0 , z_{i-bott} (ft amsl) ¹	Thickness of Layer at t_0 , H (ft)	Material Type ¹	Effective Stress at Midpoint of Layer at t_0 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_0 , σ'_{i-bott} (psf)	Effective Stress at Midpoint of Layer at t_1 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_1 , σ'_{i-bott} (psf)	Effective Stress at Midpoint of Layer at t_2 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_2 , σ'_{i-bott} (psf)	Consolidation of Layer from t_0 to t_1 , due to Final Cover Placement and Dewatering, δ_{c-1} , (ft)	Consolidation of Layer from t_1 to t_2 , due to Dewatering, δ_{c-2} , (ft)
Layer 1	5615.72	5614.17	5612.61	3.11	Int. Cover	156.63	313.25	1321.61	1478.24	1321.61	1478.24	0.23	0.00
Layer 2	5612.61	5612.37	5612.12	0.49	Sand-Slime	342.40	371.55	1507.38	1536.53	1507.38	1536.53	0.04	0.00
Layer 3	5612.12	5612.04	5611.95	0.17	Slime	381.17	390.78	1546.15	1555.76	1546.15	1555.76	0.01	0.00
Layer 4	5611.95	5611.46	5610.97	0.98	Sand-Slime	449.08	507.37	1614.06	1672.36	1614.06	1672.36	0.07	0.00
Layer 5	5610.97	5610.81	5610.64	0.33	Slime	526.04	544.71	1691.02	1709.69	1691.02	1709.69	0.02	0.00
Layer 6	5610.64	5609.82	5609.00	1.64	Sand-Slime	642.26	739.82	1807.24	1904.80	1807.24	1904.80	0.09	0.00
Layer 7	5609.00	5608.92	5608.83	0.17	Slime	749.43	759.05	1914.42	1924.03	1914.42	1924.03	0.01	0.00
Layer 8	5608.83	5608.59	5608.34	0.49	Sand-Slime	788.20	817.35	1953.18	1982.33	1953.18	1982.33	0.02	0.00
Layer 9	5608.34	5608.26	5608.18	0.16	Slime	826.40	835.45	1991.38	2000.43	1991.38	2000.43	0.01	0.00
Layer 10	5608.18	5608.10	5608.01	0.17	Sand-Slime	845.56	855.67	2010.54	2020.65	2010.54	2020.65	0.01	0.00
Layer 11	5608.01	5607.84	5607.67	0.34	Slime	874.90	894.14	2039.89	2059.12	2039.89	2059.12	0.02	0.00
Layer 12	5607.67	5607.02	5606.37	1.30	Sand-Slime	934.65	971.42	2136.45	2213.78	2136.45	2213.78	0.06	0.00
Layer 13	5606.37	5606.21	5606.05	0.32	Slime	979.54	987.65	2231.88	2249.98	2231.88	2249.98	0.01	0.00
Layer 14	5606.05	5604.98	5603.91	2.14	Sand-Slime	1048.19	1108.72	2377.28	2504.58	2377.28	2504.58	0.09	0.00
Layer 15	5603.91	5603.26	5602.60	1.31	Slime	1141.94	1175.17	2578.68	2652.78	2578.68	2652.78	0.06	0.00
Layer 16	5602.60	5601.62	5600.63	1.97	Sand-Slime	1230.89	1286.62	2769.96	2887.15	2769.96	2887.15	0.08	0.00
Layer 17	5600.63	5600.47	5600.30	0.33	Slime	1294.99	1303.36	2905.82	2924.48	2905.82	2924.48	0.01	0.00
Layer 18	5600.30	5600.14	5599.98	0.32	Sand-Slime	1312.41	1321.46	2943.52	2962.55	2943.52	2962.55	0.01	0.00
Layer 19	5599.98	5599.08	5598.17	1.81	Slime	1367.37	1413.28	3064.93	3167.31	3064.93	3167.31	0.08	0.00
Layer 20	5598.17	5597.85	5597.52	0.65	Sand-Slime	1431.66	1450.05	3205.98	3230.29	3205.98	3244.64	0.03	0.00
Layer 21	5597.52	5597.36	5597.19	0.33	Slime	1458.42	1466.79	3238.66	3247.03	3263.31	3281.98	0.01	0.00
Layer 22	5597.19	5596.54	5595.88	1.31	Sand-Slime	1503.84	1540.90	3284.09	3321.14	3359.90	3437.83	0.05	0.00
Layer 23	5595.88	5595.55	5595.22	0.66	Slime	1557.64	1574.38	3337.88	3354.62	3475.16	3512.49	0.03	0.00
Layer 24	5595.22	5595.06	5594.89	0.33	Sand-Slime	1583.71	1593.04	3363.96	3373.29	3532.12	3551.75	0.01	0.00
Layer 25	5594.89	5594.65	5594.40	0.49	Slime	1605.47	1617.90	3385.72	3398.15	3579.47	3607.19	0.02	0.00
Layer 26	5594.40	5594.24	5594.07	0.33	Sand-Slime	1627.23	1636.57	3407.48	3416.81	3626.82	3646.45	0.01	0.00
Layer 27	5594.07	5593.41	5592.75	1.32	Sand-Slime	1673.91	1711.24	3454.15	3491.49	3724.97	3721.12	0.05	0.00

Total Consolidation of Profile at t_1 , δ_{c-1} (ft): 1.15

Total Consolidation of Profile at t_2 , δ_{c-2} (ft): 0.01

Notes:

¹ From on-site investigation (Tailings Data Analysis Report, MWH, 2015)

2W4-C

FINAL COVER

5626.19	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover deisgn grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
4.00	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
1.95	Thickness of Random/Platform Fill on on top of existing interim cover (ft)	Calculated
1104.55	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5611.20	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report. MWH, 2015)
5608.1	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013)
5593.51	Water surface elevation at t_1 (ft amsl)	
5588.51	Water surface elevation at t_2 (ft amsl)	

2W4-C

CONSOLIDATION SETTLEMENT

Soil Layer	Elevation at Top of Layer at t_0 , z_i , (ft amsl) ¹	Elevation at Midpoint of Layer at t_0 , z_{i-mid} (ft amsl)	Elevation at Bottom of Layer at t_0 , z_{i-bott} (ft amsl) ¹	Thickness of Layer at t_0 , H (ft)	Material Type ¹	Effective Stress at Midpoint of Layer at t_0 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_0 , σ'_{i-bott} (psf)	Effective Stress at Midpoint of Layer at t_1 , σ'_{1-mid} (psf)	Effective Stress at Bottom of Layer at t_1 , σ'_{1-bott} (psf)	Effective Stress at Midpoint of Layer at t_2 , σ'_{2-mid} (psf)	Effective Stress at Bottom of Layer at t_2 , σ'_{2-bott} (psf)	Consolidation of Layer from t_0 to t_1 , due to Final Cover Placement and Dewatering, $\delta_{c,1}$, (ft)	Consolidation of Layer from t_1 to t_2 due to Dewatering, $\delta_{c,2}$, (ft)
Layer 1	5616.24	5614.68	5613.12	3.12	Int. Cover	157.13	314.26	1261.68	1261.68	1418.81	1418.81	0.23	0.00
Layer 2	5613.12	5613.04	5612.96	0.16	Sand	324.14	334.02	1428.69	1438.56	1428.69	1438.56	0.01	0.00
Layer 3	5612.96	5611.32	5609.68	3.28	Sand-Slime	529.13	724.24	1633.68	1828.79	1633.68	1828.79	0.19	0.00
Layer 4	5609.68	5609.60	5609.51	0.17	Slime	733.86	743.48	1838.41	1848.02	1838.41	1848.02	0.01	0.00
Layer 5	5609.51	5608.28	5607.05	2.46	Sand-Slime	889.81	969.38	1994.36	2140.69	1994.36	2140.69	0.10	0.00
Layer 6	5607.05	5606.89	5606.73	0.32	Slime	977.49	985.61	2158.79	2176.89	2158.79	2176.89	0.01	0.00
Layer 7	5606.73	5606.57	5606.40	0.33	Sand-Slime	994.94	1004.28	2196.52	2216.15	2196.52	2216.15	0.01	0.00
Layer 8	5606.40	5606.32	5606.23	0.17	Slime	1008.59	1012.90	2225.77	2235.38	2225.77	2235.38	0.01	0.00
Layer 9	5606.23	5605.41	5604.59	1.64	Sand-Slime	1059.29	1105.68	2332.94	2430.50	2332.94	2430.50	0.07	0.00
Layer 10	5604.59	5604.51	5604.43	0.16	Slime	1109.74	1113.80	2439.55	2448.60	2439.55	2448.60	0.01	0.00
Layer 11	5604.43	5604.27	5604.10	0.33	Sand-Slime	1123.13	1132.46	2468.23	2487.86	2468.23	2487.86	0.01	0.00
Layer 12	5604.10	5603.94	5603.77	0.33	Slime	1140.83	1149.20	2506.52	2525.19	2506.52	2525.19	0.01	0.00
Layer 13	5603.77	5601.89	5600.00	3.77	Sand-Slime	1255.84	1362.48	2749.45	2973.71	2749.45	2973.71	0.16	0.00
Layer 14	5600.00	5599.43	5598.85	1.15	Slime	1391.65	1420.81	3038.76	3103.81	3038.76	3103.81	0.05	0.00
Layer 15	5598.85	5598.44	5598.03	0.82	Sand-Slime	1444.01	1467.20	3152.59	3201.37	3152.59	3201.37	0.03	0.00
Layer 16	5598.03	5597.95	5597.87	0.16	Slime	1471.26	1475.32	3210.42	3219.47	3210.42	3219.47	0.01	0.00
Layer 17	5597.87	5597.63	5597.38	0.49	Sand-Slime	1489.18	1503.04	3248.61	3277.76	3248.61	3277.76	0.02	0.00
Layer 18	5597.38	5597.22	5597.05	0.33	Slime	1511.41	1519.78	3296.43	3315.09	3296.43	3315.09	0.01	0.00
Layer 19	5597.05	5596.64	5596.23	0.82	Sand-Slime	1542.97	1566.17	3363.87	3412.65	3363.87	3412.65	0.03	0.00
Layer 20	5596.23	5595.82	5595.41	0.82	Slime	1586.97	1607.76	3459.03	3505.41	3459.03	3505.41	0.03	0.00
Layer 21	5595.41	5595.08	5594.75	0.66	Sand-Slime	1626.43	1645.10	3544.68	3583.94	3544.68	3583.94	0.03	0.00
Layer 22	5594.75	5594.67	5594.59	0.16	Slime	1649.16	1653.22	3582.99	3602.04	3582.99	3602.04	0.01	0.00
Layer 23	5594.59	5594.43	5594.26	0.33	Sand-Slime	1662.55	1671.89	3621.67	3641.30	3621.67	3641.30	0.01	0.00
Layer 24	5594.26	5594.10	5593.93	0.33	Slime	1680.26	1688.63	3659.96	3678.63	3659.96	3678.63	0.01	0.00
Layer 25	5593.93	5591.80	5589.67	4.26	Sand-Slime	1809.12	1929.62	3825.33	3945.83	3932.04	4185.45	0.17	0.00
Layer 26	5589.67	5589.09	5588.51	1.16	Sand-Slime	1962.43	1995.24	3978.64	4011.45	4254.45	4251.07	0.04	0.00

Total Consolidation of Profile at t_1 , $\delta_{c,t1}$ (ft): 1.29

Total Consolidation of Profile at t_2 , $\delta_{c,t2}$ (ft): 0.01

Notes:

¹ From on-site investigation (Tailings Data Analysis Report, MWH, 2015)

2W5-C

FINAL COVER

5626.29	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
4.00	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
2.43	Thickness of Random/Platform Fill on top of existing interim cover (ft)	Calculated
1152.89	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5604.20	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report. MWH, 2015)
5604.2	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013).
5589.01	Water surface elevation at t_1 (ft amsl)	
5584.01	Water surface elevation at t_2 (ft amsl)	

2W5-C

CONSOLIDATION SETTLEMENT

Soil Layer	Elevation at Top of Layer at t_0 , z_1 , z_1 (ft amsl) ¹	Elevation at Midpoint of Layer at t_0 , z_{1-mid} (ft amsl)	Elevation at Bottom of Layer at t_0 , z_{1-bott} (ft amsl) ¹	Thickness of Layer at t_0 , H (ft)	Material Type ¹	Effective Stress at Midpoint of Layer at t_0 , σ'_{1-mid} (psf)	Effective Stress at Bottom of Layer at t_0 , σ'_{1-bott} (psf)	Effective Stress at Midpoint of Layer at t_1 , σ'_{1-mid} (psf)	Effective Stress at Bottom of Layer at t_1 , σ'_{1-bott} (psf)	Effective Stress at Midpoint of Layer at t_2 , σ'_{1-mid} (psf)	Effective Stress at Bottom of Layer at t_2 , σ'_{1-bott} (psf)	Consolidation of Layer from t_0 to t_1 , due to Final Cover Placement and Dewatering, δ_{c1} (ft)
Layer 1	5615.86	5614.31	5612.75	3.11	Int. Cover	156.63	313.25	1309.52	1466.15	1309.52	1466.15	0.23
Layer 2	5612.75	5612.59	5612.42	0.33	Sand-Slime	332.88	352.51	1485.78	1505.41	1485.78	1505.41	0.03
Layer 3	5612.42	5612.09	5611.76	0.66	Sand	393.26	434.01	1546.16	1586.90	1546.16	1586.90	0.03
Layer 4	5611.76	5611.60	5611.44	0.32	Sand-Slime	453.04	472.08	1605.94	1624.97	1605.94	1624.97	0.02
Layer 5	5611.44	5611.11	5610.78	0.66	Sand	512.82	553.57	1665.72	1706.47	1665.72	1706.47	0.02
Layer 6	5610.78	5609.96	5609.14	1.64	Sand-Slime	651.13	748.68	1804.02	1901.58	1804.02	1901.58	0.09
Layer 7	5609.14	5608.90	5608.65	0.49	Sand	778.94	809.19	1931.83	1962.08	1931.83	1962.08	0.01
Layer 8	5608.65	5604.88	5601.10	7.55	Sand-Slime	1258.30	1513.98	2411.20	2860.32	2411.20	2860.32	0.26
Layer 9	5601.10	5601.02	5600.94	0.16	Sand	1518.87	1523.75	2870.19	2880.07	2870.19	2880.07	0.00
Layer 10	5600.94	5600.12	5599.30	1.64	Sand-Slime	1570.14	1616.53	2977.63	3075.18	2977.63	3075.18	0.06
Layer 11	5599.30	5599.14	5598.97	0.33	Slime	1624.90	1633.27	3093.85	3112.52	3093.85	3112.52	0.01
Layer 12	5598.97	5596.92	5594.87	4.10	Sand-Slime	1749.24	1865.21	3356.41	3600.30	3356.41	3600.30	0.14
Layer 13	5594.87	5594.46	5594.05	0.82	Slime	1886.01	1906.81	3646.68	3693.06	3646.68	3693.06	0.03
Layer 14	5594.05	5593.81	5593.56	0.49	Sand-Slime	1920.67	1934.53	3722.21	3751.36	3722.21	3751.36	0.02
Layer 15	5593.56	5593.48	5593.39	0.17	Slime	1938.84	1943.15	3760.98	3770.59	3760.98	3770.59	0.01
Layer 16	5593.39	5592.57	5591.75	1.64	Sand-Slime	1989.54	2035.93	3868.15	3965.70	3868.15	3965.70	0.06
Layer 17	5591.75	5591.59	5591.42	0.33	Slime	2044.30	2052.67	3984.37	4003.04	3984.37	4003.04	0.01
Layer 18	5591.42	5589.46	5587.49	3.93	Sand-Slime	2163.83	2275.00	4236.82	4375.75	4236.82	4470.59	0.14
Layer 19	5587.49	5587.33	5587.16	0.33	Slime	2283.37	2291.74	4384.12	4392.49	4489.26	4507.93	0.01
Layer 20	5587.16	5586.75	5586.34	0.82	Sand	2316.78	2341.82	4417.53	4442.57	4558.55	4609.17	0.02
Layer 21	5586.34	5586.18	5586.01	0.33	Sand-Slime	2351.15	2360.49	4451.90	4461.24	4628.81	4648.44	0.01
Layer 22	5586.01	5585.85	5585.68	0.33	Sand	2370.56	2380.64	4471.31	4481.39	4668.81	4689.18	0.01
Layer 23	5585.68	5584.85	5584.01	1.67	Sand-Slime	2427.88	2475.11	4528.63	4575.86	4788.52	4783.66	0.05

Total Consolidation of Profile at t_{21} , δ_{c-21} (ft): 1.26

Total Consolidation of Profile at t_{22} , δ_{c-22} (ft): 0.01

Notes:

¹ From on-site investigation (Tailings Data Analysis Report, MWH, 2015)

2W6-S

FINAL COVER

5625.41	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
4.00	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
1.56	Thickness of Random/Platform Fill on on top of existing interim cover (ft)	Calculated
1065.26	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5604.40	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report, MWH, 2015)
5604.4	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013)
5588.59	Water surface elevation at t_1 (ft amsl)	
5583.59	Water surface elevation at t_2 (ft amsl)	

2W6-S

CONSOLIDATION SETTLEMENT

Soil Layer	Elevation at Top of Layer at t_0 , z_i , t_0 (ft amsl) ¹	Elevation at Midpoint of Layer at t_0 , z_{i-mid} (ft amsl)	Elevation at Bottom of Layer at t_0 , $z_{i-bottom}$ (ft amsl) ¹	Thickness of Layer at t_0 , H (ft)	Material Type ¹	Effective Stress at Midpoint of Layer at t_0 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_0 , $\sigma'_{i-bottom}$ (psf)	Effective Stress at Midpoint of Layer at t_1 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_1 , $\sigma'_{i-bottom}$ (psf)	Effective Stress at Midpoint of Layer at t_2 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_2 , $\sigma'_{i-bottom}$ (psf)	Consolidation of Layer from t_0 to t_1 , due to Final Cover Placement and Dewatering, δ_{c-1} , (ft)	Consolidation of Layer from t_1 to t_2 , due to Dewatering, δ_{c-2} , (ft)
Layer 1	5615.85	5614.29	5612.73	3.12	Int. Cover	157.13	314.26	1222.39	1379.53	1222.39	1379.53	0.22	0.00
Layer 2	5612.73	5612.49	5612.24	0.49	Sand-Slime	343.41	372.56	1408.67	1437.82	1408.67	1437.82	0.04	0.00
Layer 3	5612.24	5612.16	5612.07	0.17	Sand	383.05	393.55	1448.32	1458.81	1448.32	1458.81	0.01	0.00
Layer 4	5612.07	5611.66	5611.25	0.82	Sand-Slime	442.33	491.10	1507.59	1556.37	1507.59	1556.37	0.05	0.00
Layer 5	5611.25	5611.01	5610.76	0.49	Sand	521.36	551.61	1586.62	1616.87	1586.62	1616.87	0.02	0.00
Layer 6	5610.76	5609.78	5608.79	1.97	Sand-Slime	668.79	785.98	1734.06	1851.24	1734.06	1851.24	0.10	0.00
Layer 7	5608.79	5608.63	5608.46	0.33	Slime	804.65	823.31	1869.91	1888.58	1869.91	1888.58	0.01	0.00
Layer 8	5608.46	5608.30	5608.14	0.32	Sand	843.07	862.82	1908.33	1928.09	1908.33	1928.09	0.01	0.00
Layer 9	5608.14	5607.40	5606.66	1.48	Sand-Slime	950.86	1038.90	2016.13	2104.17	2016.13	2104.17	0.06	0.00
Layer 10	5606.66	5606.50	5606.33	0.33	Slime	1057.57	1076.23	2122.83	2141.50	2122.83	2141.50	0.01	0.00
Layer 11	5606.33	5606.09	5605.84	0.49	Sand-Slime	1105.38	1134.53	2170.65	2199.79	2170.65	2199.79	0.02	0.00
Layer 12	5605.84	5605.51	5605.18	0.66	Slime	1171.86	1209.19	2237.13	2274.46	2237.13	2274.46	0.02	0.00
Layer 13	5605.18	5604.86	5604.53	0.65	Sand-Slime	1247.86	1286.53	2313.12	2351.79	2313.12	2351.79	0.02	0.00
Layer 14	5604.53	5604.28	5604.03	0.50	Slime	1307.32	1320.00	2380.07	2408.35	2380.07	2408.35	0.02	0.00
Layer 15	5604.03	5603.95	5603.87	0.16	Sand-Slime	1324.53	1329.05	2417.87	2427.39	2417.87	2427.39	0.01	0.00
Layer 16	5603.87	5602.64	5601.41	2.46	Slime	1391.45	1453.84	2566.53	2705.68	2566.53	2705.68	0.08	0.00
Layer 17	5601.41	5601.17	5600.92	0.49	Sand-Slime	1467.70	1481.56	2734.83	2763.98	2734.83	2763.98	0.02	0.00
Layer 18	5600.92	5600.84	5600.75	0.17	Slime	1485.87	1490.19	2773.59	2783.21	2773.59	2783.21	0.01	0.00
Layer 19	5600.75	5600.67	5600.59	0.16	Sand-Slime	1494.71	1499.24	2792.73	2802.24	2792.73	2802.24	0.01	0.00
Layer 20	5600.59	5600.18	5599.77	0.82	Slime	1520.03	1540.83	2848.63	2895.01	2848.63	2895.01	0.03	0.00
Layer 21	5599.77	5599.20	5598.62	1.15	Sand-Slime	1573.36	1605.89	2963.42	3031.83	2963.42	3031.83	0.04	0.00
Layer 22	5598.62	5598.21	5597.80	0.82	Slime	1626.69	1647.49	3078.21	3124.59	3078.21	3124.59	0.03	0.00
Layer 23	5597.80	5596.98	5596.16	1.64	Sand-Slime	1693.88	1740.26	3222.15	3319.70	3222.15	3319.70	0.06	0.00
Layer 24	5596.16	5595.92	5595.67	0.49	Slime	1752.69	1765.12	3347.42	3375.14	3347.42	3375.14	0.02	0.00
Layer 25	5595.67	5595.51	5595.34	0.33	Sand-Slime	1774.45	1783.79	3394.77	3414.40	3394.77	3414.40	0.01	0.00
Layer 26	5595.34	5595.26	5595.18	0.16	Slime	1787.85	1791.90	3423.45	3432.50	3423.45	3432.50	0.01	0.00
Layer 27	5595.18	5592.72	5590.26	4.92	Sand-Slime	1931.07	2070.24	3725.17	4017.84	3725.17	4017.84	0.17	0.00
Layer 28	5590.26	5590.18	5590.09	0.17	Slime	2074.55	2078.86	4027.45	4037.07	4027.45	4037.07	0.01	0.00
Layer 29	5590.09	5588.62	5587.14	2.95	Sand-Slime	2162.30	2245.75	4212.55	4297.55	4212.55	4388.03	0.10	0.00
Layer 30	5587.14	5586.90	5586.65	0.49	Sand	2260.71	2275.67	4312.52	4327.48	4418.28	4448.54	0.01	0.00
Layer 31	5586.65	5585.12	5583.59	3.06	Sand-Slime	2362.23	2448.78	4414.03	4500.59	4630.56	4621.64	0.10	0.01

Total Consolidation of Profile at t_1 , δ_{c-1} (ft): 1.29

Total Consolidation of Profile at t_2 , δ_{c-2} (ft): 0.01

Notes:

¹ From on-site investigation (Tailings Data Analysis Report. MWH, 2015)

2W7-C

FINAL COVER

5626.65	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
4.00	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
-0.95	Thickness of Random/Platform Fill on on top of existing interim cover (ft)	Calculated
812.44	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5613.10	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report, MWH, 2015)
5611.5	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013)
5595.40	Water surface elevation at t_1 (ft amsl)	
5590.40	Water surface elevation at t_2 (ft amsl)	

2W7-C

CONSOLIDATION SETTLEMENT

Soil Layer	Elevation at Top of Layer at t_0 , z_i , t_0 (ft amsl) ¹	Elevation at Midpoint of Layer at t_0 , z_{i-mid} (ft amsl)	Elevation at Bottom of Layer at t_0 , z_{i-bott} (ft amsl) ¹	Thickness of Layer at t_0 , H (ft)	Material Type ¹	Effective Stress at Midpoint of Layer at t_0 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_0 , σ'_{i-bott} (psf)	Effective Stress at Midpoint of Layer at t_1 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_1 , $\sigma'_{i-bott1}$ (psf)	Effective Stress at Midpoint of Layer at t_2 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_2 , $\sigma'_{i-bott2}$ (psf)	Consolidation of Layer from t_0 to t_1 , due to Final Cover Placement and Dewatering, δ_{c1} , t_1 (ft)	Consolidation of Layer from t_1 to t_2 due to Dewatering, δ_{c2} , t_2 (ft)
Layer 1	5619.60	5618.04	5616.48	3.12	Int. Cover	157.13	314.26	969.58	1126.71	969.58	1126.71	0.20	0.00
Layer 2	5616.48	5615.17	5613.86	2.62	Sand-Slime	470.11	625.97	1282.56	1438.41	1282.56	1438.41	0.14	0.00
Layer 3	5613.86	5613.78	5613.69	0.17	Slime	635.58	645.20	1448.03	1457.64	1448.03	1457.64	0.01	0.00
Layer 4	5613.69	5612.79	5611.89	1.80	Sand-Slime	752.27	859.35	1564.72	1671.79	1564.72	1671.79	0.07	0.00
Layer 5	5611.89	5611.81	5611.72	0.17	Slime	868.96	878.58	1681.41	1691.02	1681.41	1691.02	0.01	0.00
Layer 6	5611.72	5610.99	5610.25	1.47	Sand-Slime	935.13	976.71	1778.47	1865.91	1778.47	1865.91	0.05	0.00
Layer 7	5610.25	5610.17	5610.08	0.17	Slime	981.03	985.34	1875.53	1885.14	1875.53	1885.14	0.01	0.00
Layer 8	5610.08	5610.00	5609.92	0.16	Sand-Slime	989.86	994.39	1894.66	1904.18	1894.66	1904.18	0.01	0.00
Layer 9	5609.92	5609.84	5609.75	0.17	Slime	998.70	1003.01	1913.79	1923.41	1913.79	1923.41	0.01	0.00
Layer 10	5609.75	5606.15	5602.54	7.21	Sand-Slime	1206.95	1410.89	2352.30	2781.19	2352.30	2781.19	0.25	0.00
Layer 11	5602.54	5602.21	5601.88	0.66	Slime	1427.63	1444.37	2818.53	2855.86	2818.53	2855.86	0.02	0.00
Layer 12	5601.88	5601.80	5601.72	0.16	Sand-Slime	1448.90	1453.42	2865.38	2874.89	2865.38	2874.89	0.01	0.00
Layer 13	5601.72	5601.56	5601.39	0.33	Slime	1461.79	1470.16	2893.56	2912.23	2893.56	2912.23	0.01	0.00
Layer 14	5601.39	5600.74	5600.08	1.31	Sand-Slime	1507.22	1544.27	2990.15	3068.08	2990.15	3068.08	0.05	0.00
Layer 15	5600.08	5600.00	5599.91	0.17	Slime	1548.58	1552.90	3077.69	3087.31	3077.69	3087.31	0.01	0.00
Layer 16	5599.91	5599.83	5599.75	0.16	Sand	1557.78	1562.67	3097.19	3107.07	3097.19	3107.07	0.00	0.00
Layer 17	5599.75	5599.67	5599.58	0.17	Sand-Slime	1567.48	1572.29	3117.18	3127.29	3117.18	3127.29	0.01	0.00
Layer 18	5599.58	5599.26	5598.93	0.65	Slime	1588.77	1605.26	3164.06	3200.82	3164.06	3200.82	0.02	0.00
Layer 19	5598.93	5598.52	5598.11	0.82	Sand-Slime	1628.45	1651.65	3249.60	3298.38	3249.60	3298.38	0.03	0.00
Layer 20	5598.11	5597.62	5597.12	0.99	Slime	1676.76	1701.87	3354.38	3410.38	3354.38	3410.38	0.04	0.00
Layer 21	5597.12	5596.96	5596.80	0.32	Sand-Slime	1710.92	1719.97	3429.41	3448.45	3429.41	3448.45	0.01	0.00
Layer 22	5596.80	5596.72	5596.63	0.17	Slime	1724.28	1728.59	3458.06	3467.68	3458.06	3467.68	0.01	0.00
Layer 23	5596.63	5596.39	5596.14	0.49	Sand-Slime	1742.45	1756.31	3496.83	3525.97	3496.83	3525.97	0.02	0.00
Layer 24	5596.14	5596.06	5595.98	0.16	Slime	1760.37	1764.43	3535.02	3544.07	3535.02	3544.07	0.01	0.00
Layer 25	5595.98	5595.57	5595.16	0.82	Sand-Slime	1787.62	1810.82	3592.85	3626.66	3592.85	3641.63	0.03	0.00
Layer 26	5595.16	5594.83	5594.50	0.66	Slime	1827.56	1844.30	3643.40	3660.14	3678.96	3716.30	0.02	0.00
Layer 27	5594.50	5594.42	5594.34	0.16	Sand-Slime	1848.82	1853.35	3664.66	3669.19	3725.81	3735.33	0.01	0.00
Layer 28	5594.34	5594.09	5593.84	0.50	Slime	1866.03	1878.71	3681.87	3694.55	3763.61	3791.89	0.02	0.00
Layer 29	5593.84	5593.60	5593.35	0.49	Sand-Slime	1892.57	1906.43	3708.41	3722.27	3821.04	3850.19	0.02	0.00
Layer 30	5593.35	5593.27	5593.19	0.16	Slime	1910.49	1914.55	3726.33	3730.39	3859.24	3868.29	0.01	0.00
Layer 31	5593.19	5592.62	5592.04	1.15	Sand-Slime	1947.08	1979.61	3762.92	3795.44	3936.70	4005.11	0.04	0.00
Layer 32	5592.04	5591.80	5591.55	0.49	Slime	1992.04	2004.46	3807.87	3820.30	4032.82	4060.54	0.02	0.00
Layer 33	5591.55	5590.98	5590.40	1.15	Sand-Slime	2036.99	2069.52	3852.83	3885.36	4128.95	4125.60	0.04	0.00

Total Consolidation of Profile at t_1 , $\delta_{c,t1}$ (ft): 1.17

Total Consolidation of Profile at t_2 , $\delta_{c,t2}$ (ft): 0.01

Notes:

¹ From on-site investigation (Tailings Data Analysis Report. MWH, 2015)

2E1

FINAL COVER

5630.46	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
4.00	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
2.51	Thickness of Random/Platform Fill on on top of existing interim cover (ft)	Calculated
1160.95	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5610.80	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report, MWH, 2015)
5610.8	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013)
5595.46	Water surface elevation at t_1 (ft amsl)	
5590.46	Water surface elevation at t_2 (ft amsl)	

2E1

CONSOLIDATION SETTLEMENT

Soil Layer	Elevation at Top of Layer at t_0 , z_i , t_0 (ft amsl) ¹	Elevation at Midpoint of Layer at t_0 , z_{i-mid} (ft amsl)	Elevation at Bottom of Layer at t_0 , z_{i-bott} (ft amsl) ¹	Thickness of Layer at t_0 , H (ft)	Material Type ¹	Effective Stress at Midpoint of Layer at t_0 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_0 , σ'_{i-bott} (psf)	Effective Stress at Midpoint of Layer at t_1 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_1 , σ'_{i-bott} (psf)	Effective Stress at Midpoint of Layer at t_2 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_2 , σ'_{i-bott} (psf)	Consolidation of Layer from t_0 to t_1 , due to Final Cover Placement and Dewatering, δ_{c-1} , (ft)	Consolidation of Layer from t_1 to t_2 due to Dewatering, δ_{c-2} , (ft)
Layer 1	5619.95	5618.39	5616.83	3.12	Int. Cover	157.13	314.26	1318.08	1475.21	1318.08	1475.21	0.23	0.00
Layer 2	5616.83	5616.50	5616.17	0.66	Sand	355.01	395.75	1515.96	1556.71	1515.96	1556.71	0.03	0.00
Layer 3	5616.17	5615.93	5615.68	0.49	Sand-Slime	424.90	454.05	1585.85	1615.00	1585.85	1615.00	0.03	0.00
Layer 4	5615.68	5615.52	5615.35	0.33	Slime	472.72	491.38	1633.67	1652.33	1633.67	1652.33	0.02	0.00
Layer 5	5615.35	5615.19	5615.02	0.33	Sand-Slime	511.01	530.64	1671.96	1691.60	1671.96	1691.60	0.02	0.00
Layer 6	5615.02	5614.61	5614.20	0.82	Sand	581.27	631.89	1742.22	1792.84	1742.22	1792.84	0.03	0.00
Layer 7	5614.20	5613.79	5613.38	0.82	Sand-Slime	680.67	729.45	1841.62	1890.40	1841.62	1890.40	0.04	0.00
Layer 8	5613.38	5613.22	5613.06	0.32	Sand	749.20	768.96	1910.16	1929.91	1910.16	1929.91	0.01	0.00
Layer 9	5613.06	5610.44	5607.81	5.25	Sand-Slime	1058.48	1206.98	2242.21	2554.51	2242.21	2554.51	0.21	0.00
Layer 10	5607.81	5607.73	5607.64	0.17	Slime	1211.30	1215.61	2564.13	2573.74	2564.13	2573.74	0.01	0.00
Layer 11	5607.64	5607.56	5607.48	0.16	Sand-Slime	1220.13	1224.66	2583.26	2592.78	2583.26	2592.78	0.01	0.00
Layer 12	5607.48	5607.40	5607.31	0.17	Slime	1228.97	1233.28	2602.40	2612.01	2602.40	2612.01	0.01	0.00
Layer 13	5607.31	5606.58	5605.84	1.47	Sand-Slime	1274.86	1316.44	2699.45	2786.90	2699.45	2786.90	0.06	0.00
Layer 14	5605.84	5605.76	5605.67	0.17	Slime	1320.75	1325.07	2796.51	2806.13	2796.51	2806.13	0.01	0.00
Layer 15	5605.67	5605.51	5605.35	0.32	Sand-Slime	1334.12	1343.17	2825.17	2844.20	2825.17	2844.20	0.01	0.00
Layer 16	5605.35	5605.27	5605.18	0.17	Slime	1347.48	1351.79	2853.82	2863.43	2853.82	2863.43	0.01	0.00
Layer 17	5605.18	5601.49	5597.80	7.38	Sand-Slime	1560.54	1769.29	3302.44	3741.44	3302.44	3741.44	0.29	0.00
Layer 18	5597.80	5597.64	5597.47	0.33	Slime	1777.66	1786.03	3760.11	3778.77	3760.11	3778.77	0.01	0.00
Layer 19	5597.47	5595.83	5594.19	3.28	Sand-Slime	1878.81	1971.58	3973.89	4089.75	3973.89	4169.00	0.13	0.00
Layer 20	5594.19	5594.03	5593.86	0.33	Slime	1979.95	1988.32	4098.12	4106.49	4187.67	4206.33	0.01	0.00
Layer 21	5593.86	5593.70	5593.54	0.32	Sand-Slime	1997.38	2006.43	4115.54	4124.60	4225.37	4244.40	0.01	0.00
Layer 22	5593.54	5593.38	5593.21	0.33	Slime	2014.80	2023.17	4132.97	4141.34	4263.07	4281.74	0.01	0.00
Layer 23	5593.21	5592.55	5591.89	1.32	Sand-Slime	2060.50	2097.84	4178.67	4216.01	4360.26	4438.78	0.05	0.00
Layer 24	5591.89	5591.18	5590.46	1.43	Sand-Slime	2138.29	2178.74	4256.46	4296.91	4523.84	4519.67	0.05	0.00

Total Consolidation of Profile at t_1 , δ_{c-t1} (ft): 1.30

Total Consolidation of Profile at t_2 , δ_{c-t2} (ft): 0.01

Notes:

¹ From on-site investigation (Tailings Data Analysis Report. MWH, 2015)

3-1S

FINAL COVER

5620.47	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover deisgn grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
0.41	Thickness of Random/Platform Fill on on top of existing interim cover (ft)	Calculated
887.10	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5608.00	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report. MWH, 2015)
5604.4	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013)
5595.59	Water surface elevation at t_1 (ft amsl)	
5590.59	Water surface elevation at t_2 (ft amsl)	

3-1S

CONSOLIDATION SETTLEMENT

Soil Layer	Elevation at Top of Layer at t_0 , z_i , t_0 (ft amsl) ¹	Elevation at Midpoint of Layer at t_0 , z_{i-mid} (ft amsl)	Elevation at Bottom of Layer at t_0 , z_{i-bott} (ft amsl) ¹	Thickness of Layer at t_0 , H (ft)	Material Type ¹	Effective Stress at Midpoint of Layer at t_0 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_0 , σ'_{i-bott} (psf)	Effective Stress at Midpoint of Layer at t_1 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_1 , $\sigma'_{i-bott1}$ (psf)	Effective Stress at Midpoint of Layer at t_2 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_2 , $\sigma'_{i-bott2}$ (psf)	Consolidation of Layer from t_0 to t_1 , due to Final Cover Placement and Dewatering, δ_{c1} , (ft)	Consolidation of Layer from t_1 to t_2 due to Dewatering, δ_{c1-2} (ft)
Layer 1	5612.56	5611.00	5609.44	3.12	Int. Cover	157.13	314.26	1044.24	1201.37	1044.24	1201.37	0.21	0.00
Layer 2	5609.44	5608.71	5607.97	1.47	Slime	397.41	480.56	1284.51	1367.66	1284.51	1367.66	0.09	0.00
Layer 3	5607.97	5607.89	5607.80	0.17	Sand-Slime	490.67	500.78	1377.78	1387.89	1377.78	1387.89	0.01	0.00
Layer 4	5607.80	5606.49	5605.18	2.62	Sand	662.53	824.29	1549.64	1711.39	1549.64	1711.39	0.07	0.00
Layer 5	5605.18	5604.93	5604.68	0.50	Sand-Slime	854.03	883.77	1741.13	1770.88	1741.13	1770.88	0.02	0.00
Layer 6	5604.68	5604.44	5604.19	0.49	Sand	913.71	928.67	1801.13	1831.38	1801.13	1831.38	0.01	0.00
Layer 7	5604.19	5603.78	5603.37	0.82	Sand-Slime	951.87	975.06	1880.16	1928.94	1880.16	1928.94	0.03	0.00
Layer 8	5603.37	5603.13	5602.88	0.49	Sand	990.03	1004.99	1959.19	1989.44	1959.19	1989.44	0.01	0.00
Layer 9	5602.88	5602.72	5602.55	0.33	Sand-Slime	1014.32	1023.66	2009.07	2028.70	2009.07	2028.70	0.01	0.00
Layer 10	5602.55	5602.47	5602.39	0.16	Slime	1027.72	1031.77	2037.75	2046.80	2037.75	2046.80	0.01	0.00
Layer 11	5602.39	5601.24	5600.09	2.30	Sand-Slime	1096.83	1161.89	2183.62	2320.43	2183.62	2320.43	0.08	0.00
Layer 12	5600.09	5600.01	5599.93	0.16	Sand	1166.77	1171.66	2330.31	2340.19	2330.31	2340.19	0.00	0.00
Layer 13	5599.93	5597.96	5595.99	3.94	Sand-Slime	1283.11	1394.55	2574.56	2808.94	2574.56	2808.94	0.14	0.00
Layer 14	5595.99	5595.91	5595.83	0.16	Slime	1398.61	1402.67	2817.99	2827.04	2817.99	2827.04	0.01	0.00
Layer 15	5595.83	5595.26	5594.68	1.15	Sand-Slime	1435.20	1467.72	2874.54	2907.07	2895.44	2963.85	0.04	0.00
Layer 16	5594.68	5592.64	5590.59	4.09	Sand-Slime	1583.41	1699.10	3022.76	3138.45	3207.15	3195.23	0.14	0.01

Total Consolidation of Profile at t_1 , $\delta_{c,t1}$ (ft): 0.88

Total Consolidation of Profile at t_2 , $\delta_{c,t2}$ (ft): 0.01

Notes:

¹ From on-site investigation (Tailings Data Analysis Report, MWH, 2015)

3-2C

FINAL COVER

5621.51	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.19	Thickness of Random/Platform Fill on on top of existing interim cover (ft)	Calculated
1167.12	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5605.30	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report, MWH, 2015)
5602.7	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013)
5591.64	Water surface elevation at t_1 (ft amsl)	
5586.64	Water surface elevation at t_2 (ft amsl)	

3-2C

CONSOLIDATION SETTLEMENT

Soil Layer	Elevation at Top of Layer at t_0 , z_i , t_0 (ft amsl) ¹	Elevation at Midpoint of Layer at t_0 , z_i , t_0 (ft amsl)	Elevation at Bottom of Layer at t_0 , z_i , t_0 (ft amsl) ¹	Thickness of Layer at t_0 , H (ft)	Material Type ¹	Effective Stress at Midpoint of Layer at t_0 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_0 , σ'_{i-bott} (psf)	Effective Stress at Midpoint of Layer at t_1 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_1 , σ'_{i-bott} (psf)	Effective Stress at Midpoint of Layer at t_2 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_2 , σ'_{i-bott} (psf)	Consolidation of Layer from t_0 to t_1 , due to Final Cover Placement and Dewatering, $\delta_{c,1}$ (ft)	Consolidation of Layer from t_1 to t_2 due to Dewatering, $\delta_{c,2}$ (ft)
Layer 1	5610.82	5609.27	5607.71	3.11	Int. Cover	156.63	313.25	1323.75	1480.37	1323.75	1480.37	0.23	0.00
Layer 2	5607.71	5607.63	5607.54	0.17	Sand	323.75	334.24	1490.87	1501.36	1490.87	1501.36	0.01	0.00
Layer 3	5607.54	5607.46	5607.38	0.16	Sand-Slime	343.76	353.28	1510.88	1520.40	1510.88	1520.40	0.01	0.00
Layer 4	5607.38	5606.89	5606.39	0.99	Slime	409.28	465.28	1576.40	1632.40	1576.40	1632.40	0.07	0.00
Layer 5	5606.39	5605.98	5605.57	0.82	Sand-Slime	514.05	562.83	1681.17	1729.95	1681.17	1729.95	0.05	0.00
Layer 6	5605.57	5605.41	5605.24	0.33	Slime	581.50	600.16	1748.62	1767.28	1748.62	1767.28	0.02	0.00
Layer 7	5605.24	5605.08	5604.92	0.32	Sand-Slime	619.20	638.24	1786.32	1805.36	1786.32	1805.36	0.02	0.00
Layer 8	5604.92	5604.59	5604.26	0.66	Slime	675.57	712.90	1842.69	1880.02	1842.69	1880.02	0.04	0.00
Layer 9	5604.26	5600.82	5597.37	6.89	Sand-Slime	1004.51	1199.40	2289.88	2699.73	2289.88	2699.73	0.30	0.00
Layer 10	5597.37	5597.29	5597.21	0.16	Slime	1203.45	1207.51	2708.78	2717.83	2708.78	2717.83	0.01	0.00
Layer 11	5597.21	5596.96	5596.71	0.50	Sand-Slime	1221.66	1235.80	2747.58	2777.32	2747.58	2777.32	0.02	0.00
Layer 12	5596.71	5596.22	5595.73	0.98	Slime	1260.66	1285.51	2832.75	2888.18	2832.75	2888.18	0.04	0.00
Layer 13	5595.73	5594.99	5594.25	1.48	Sand-Slime	1327.37	1369.24	2976.22	3064.26	2976.22	3064.26	0.06	0.00
Layer 14	5594.25	5594.17	5594.09	0.16	Slime	1373.30	1377.35	3073.31	3082.36	3073.31	3082.36	0.01	0.00
Layer 15	5594.09	5593.52	5592.94	1.15	Sand-Slime	1409.88	1442.41	3150.77	3219.18	3150.77	3219.18	0.05	0.00
Layer 16	5592.94	5592.78	5592.61	0.33	Slime	1450.78	1459.15	3237.84	3256.51	3237.84	3256.51	0.01	0.00
Layer 17	5592.61	5592.20	5591.79	0.82	Sand-Slime	1482.35	1505.54	3305.29	3354.07	3305.29	3354.07	0.03	0.00
Layer 18	5591.79	5591.63	5591.46	0.33	Slime	1513.91	1522.28	3371.80	3380.17	3372.73	3391.40	0.01	0.00
Layer 19	5591.46	5591.22	5590.97	0.49	Sand-Slime	1536.14	1550.00	3394.03	3407.89	3420.55	3449.70	0.02	0.00
Layer 20	5590.97	5590.89	5590.81	0.16	Slime	1554.06	1558.12	3411.95	3416.00	3458.75	3467.60	0.01	0.00
Layer 21	5590.81	5590.65	5590.48	0.33	Sand-Slime	1567.45	1576.78	3425.34	3434.67	3487.43	3507.06	0.01	0.00
Layer 22	5590.48	5588.56	5586.64	3.84	Sand-Slime	1685.40	1794.02	3543.29	3651.91	3735.48	3724.29	0.15	0.01

Total Consolidation of Profile at t_1 , $\delta_{c,t1}$ (ft): 1.19

Total Consolidation of Profile at t_2 , $\delta_{c,t2}$ (ft): 0.01

Notes:

¹ From on-site investigation (Tailings Data Analysis Report. MWH, 2015)

3-3S

FINAL COVER

5620.49	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.36	Thickness of Random/Platform Fill on on top of existing interim cover (ft)	Calculated
1184.24	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5605.60	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report, MWH, 2015)
5601.5	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013)
5582.14	Water surface elevation at t_1 (ft amsl)	
5577.14	Water surface elevation at t_2 (ft amsl)	

3-3S

CONSOLIDATION SETTLEMENT

Soil Layer	Elevation at Top of Layer at t_0 , z_i , t_0 (ft amsl) ¹	Elevation at Midpoint of Layer at t_0 , z_{i-mid} (ft amsl)	Elevation at Bottom of Layer at t_0 , z_{i-bott} (ft amsl) ¹	Thickness of Layer at t_0 , H (ft)	Material Type ¹	Effective Stress at Midpoint of Layer at t_0 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_0 , σ'_{i-bott} (psf)	Effective Stress at Midpoint of Layer at t_1 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_1 , σ'_{i-bott} (psf)	Effective Stress at Midpoint of Layer at t_2 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_2 , σ'_{i-bott} (psf)	Consolidation of Layer from t_0 to t_1 , due to Final Cover Placement and Dewatering, δ_{c-1} , t_1 (ft)	Consolidation of Layer from t_1 to t_2 due to Dewatering, δ_{c-2} , t_2 (ft)
Layer 1	5609.63	5608.08	5606.52	3.11	Int. Cover	156.63	313.25	1340.87	1497.50	1340.87	1497.50	0.23	0.00
Layer 2	5606.52	5606.11	5605.70	0.82	Sand	363.88	414.50	1548.12	1598.75	1548.12	1598.75	0.04	0.00
Layer 3	5605.70	5605.45	5605.20	0.50	Sand-Slime	444.25	473.99	1628.49	1658.23	1628.49	1658.23	0.03	0.00
Layer 4	5605.20	5604.47	5603.73	1.47	Sand	564.74	655.50	1748.99	1839.74	1748.99	1839.74	0.05	0.00
Layer 5	5603.73	5602.50	5601.27	2.46	Sand-Slime	801.83	932.57	1986.07	2132.41	1986.07	2132.41	0.12	0.00
Layer 6	5601.27	5601.11	5600.94	0.33	Slime	940.94	949.31	2151.07	2169.74	2151.07	2169.74	0.01	0.00
Layer 7	5600.94	5600.86	5600.78	0.16	Sand-Slime	953.83	958.36	2179.26	2188.78	2179.26	2188.78	0.01	0.00
Layer 8	5600.78	5600.62	5600.45	0.33	Slime	966.73	975.10	2207.44	2226.11	2207.44	2226.11	0.01	0.00
Layer 9	5600.45	5599.55	5598.64	1.81	Sand-Slime	1026.29	1077.49	2333.78	2441.45	2333.78	2441.45	0.08	0.00
Layer 10	5598.64	5598.23	5597.82	0.82	Slime	1098.29	1119.09	2487.83	2534.21	2487.83	2534.21	0.04	0.00
Layer 11	5597.82	5597.58	5597.33	0.49	Sand-Slime	1132.95	1146.81	2563.36	2592.51	2563.36	2592.51	0.02	0.00
Layer 12	5597.33	5597.25	5597.17	0.16	Slime	1150.87	1154.92	2601.56	2610.61	2601.56	2610.61	0.01	0.00
Layer 13	5597.17	5596.35	5595.53	1.64	Sand-Slime	1201.31	1247.70	2708.16	2805.72	2708.16	2805.72	0.07	0.00
Layer 14	5595.53	5595.45	5595.36	0.17	Slime	1252.01	1256.32	2815.34	2824.95	2815.34	2824.95	0.01	0.00
Layer 15	5595.36	5595.20	5595.03	0.33	Sand-Slime	1265.66	1274.99	2844.58	2864.21	2844.58	2864.21	0.01	0.00
Layer 16	5595.03	5594.71	5594.38	0.65	Slime	1291.48	1307.97	2900.98	2937.74	2900.98	2937.74	0.03	0.00
Layer 17	5594.38	5593.89	5593.39	0.99	Sand-Slime	1335.97	1363.97	2996.64	3055.53	2996.64	3055.53	0.04	0.00
Layer 18	5593.39	5593.07	5592.74	0.65	Slime	1380.46	1396.94	3092.29	3129.06	3092.29	3129.06	0.03	0.00
Layer 19	5592.74	5592.17	5591.59	1.15	Sand-Slime	1429.47	1462.00	3197.47	3265.88	3197.47	3265.88	0.05	0.00
Layer 20	5591.59	5591.51	5591.43	0.16	Slime	1466.06	1470.12	3274.93	3283.98	3274.93	3283.98	0.01	0.00
Layer 21	5591.43	5590.94	5590.44	0.99	Sand-Slime	1498.12	1526.12	3342.87	3401.76	3342.87	3401.76	0.04	0.00
Layer 22	5590.44	5590.36	5590.28	0.16	Slime	1530.18	1534.24	3410.81	3419.86	3410.81	3419.86	0.01	0.00
Layer 23	5590.28	5589.71	5589.13	1.15	Sand-Slime	1566.77	1599.30	3488.27	3556.68	3488.27	3556.68	0.05	0.00
Layer 24	5589.13	5588.97	5588.80	0.33	Sand	1609.37	1619.45	3577.05	3597.42	3577.05	3597.42	0.01	0.00
Layer 25	5588.80	5587.57	5586.34	2.46	Sand-Slime	1689.03	1758.62	3743.76	3890.09	3743.76	3890.09	0.10	0.00
Layer 26	5586.34	5586.10	5585.85	0.49	Sand	1773.58	1788.54	3920.34	3950.59	3920.34	3950.59	0.01	0.00
Layer 27	5585.85	5581.50	5577.14	8.71	Sand-Slime	2034.91	2281.28	4428.47	4674.84	4468.72	4443.33	0.36	0.00

Total Consolidation of Profile at t_1 , δ_{c-t1} (ft): 1.47

Total Consolidation of Profile at t_2 , δ_{c-t2} (ft): 0.00

Notes:

¹ From on-site investigation (Tailings Data Analysis Report, MWH, 2015)

3-4N

FINAL COVER

5623.36	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
7.16	Thickness of Random/Platform Fill on on top of existing interim cover (ft)	Calculated
1567.00	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5606.00	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report, MWH, 2015)
5600.6	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013)
5583.71	Water surface elevation at t_1 (ft amsl)	
5578.71	Water surface elevation at t_2 (ft amsl)	

3-4N

CONSOLIDATION SETTLEMENT

Soil Layer	Elevation at Top of Layer at t_0 , z_i , t_0 (ft amsl) ¹	Elevation at Midpoint of Layer at t_0 , z_{i-mid} (ft amsl)	Elevation at Bottom of Layer at t_0 , z_{i-bott} (ft amsl) ¹	Thickness of Layer at t_0 , H (ft)	Material Type ¹	Effective Stress at Midpoint of Layer at t_0 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_0 , σ'_{i-bott} (psf)	Effective Stress at Midpoint of Layer at t_1 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_1 , $\sigma'_{i-bott1}$ (psf)	Effective Stress at Midpoint of Layer at t_2 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_2 , $\sigma'_{i-bott2}$ (psf)	Consolidation of Layer from t_0 to t_1 , due to Final Cover Placement and Dewatering, δ_{c1} , (ft)	Consolidation of Layer from t_1 to t_2 due to Dewatering, δ_{c1-2} (ft)
Layer 1	5608.70	5607.14	5605.58	3.12	Int. Cover	157.13	314.26	1724.13	1881.26	1724.13	1881.26	0.26	0.00
Layer 2	5605.58	5604.60	5603.61	1.97	Sand	435.88	557.51	2002.88	2124.50	2002.88	2124.50	0.09	0.00
Layer 3	5603.61	5601.32	5599.02	4.59	Sand-Slime	830.54	1006.24	2397.54	2670.58	2397.54	2670.58	0.26	0.00
Layer 4	5599.02	5598.20	5597.38	1.64	Slime	1047.84	1089.43	2763.35	2856.11	2763.35	2856.11	0.08	0.00
Layer 5	5597.38	5597.22	5597.05	0.33	Sand-Slime	1098.77	1108.10	2875.74	2895.37	2875.74	2895.37	0.02	0.00
Layer 6	5597.05	5596.72	5596.39	0.66	Sand	1128.26	1148.41	2936.12	2976.86	2936.12	2976.86	0.02	0.00
Layer 7	5596.39	5596.31	5596.23	0.16	Slime	1152.47	1156.53	2985.91	2994.96	2985.91	2994.96	0.01	0.00
Layer 8	5596.23	5596.07	5595.90	0.33	Sand-Slime	1165.86	1175.20	3014.59	3034.22	3014.59	3034.22	0.02	0.00
Layer 9	5595.90	5595.82	5595.74	0.16	Sand	1180.08	1184.97	3044.10	3053.98	3044.10	3053.98	0.00	0.00
Layer 10	5595.74	5595.66	5595.57	0.17	Slime	1189.28	1193.59	3063.60	3073.21	3063.60	3073.21	0.01	0.00
Layer 11	5595.57	5595.49	5595.41	0.16	Sand-Slime	1198.12	1202.64	3082.73	3092.25	3082.73	3092.25	0.01	0.00
Layer 12	5595.41	5595.00	5594.59	0.82	Slime	1223.44	1244.24	3138.63	3185.01	3138.63	3185.01	0.04	0.00
Layer 13	5594.59	5594.43	5594.26	0.33	Sand-Slime	1253.57	1262.91	3204.64	3224.27	3204.64	3224.27	0.02	0.00
Layer 14	5594.26	5594.10	5593.93	0.33	Slime	1271.28	1279.65	3242.94	3261.60	3242.94	3261.60	0.02	0.00
Layer 15	5593.93	5590.74	5587.54	6.39	Sand-Slime	1460.39	1641.14	3641.72	4021.83	3641.72	4021.83	0.31	0.00
Layer 16	5587.54	5583.13	5578.71	8.83	Sand-Slime	1890.90	2140.66	4510.59	4760.35	4547.09	4521.36	0.40	0.00

Total Consolidation of Profile at t_1 , $\delta_{c,t1}$ (ft): 1.56

Total Consolidation of Profile at t_2 , $\delta_{c,t2}$ (ft): 0.00

Notes:

¹ From on-site investigation (Tailings Data Analysis Report, MWH, 2015)

3-6N

FINAL COVER

5623.62	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
8.68	Thickness of Random/Platform Fill on on top of existing interim cover (ft)	Calculated
1720.10	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5604.20	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report, MWH, 2015)
5599.3	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013)
5590.44	Water surface elevation at t_1 (ft amsl)	
5585.44	Water surface elevation at t_2 (ft amsl)	

3-6N

CONSOLIDATION SETTLEMENT

Soil Layer	Elevation at Top of Layer at t_0 , z_i , t_0 (ft amsl) ¹	Elevation at Midpoint of Layer at t_0 , z_{i-mid} (ft amsl)	Elevation at Bottom of Layer at t_0 , z_{i-bott} (ft amsl) ¹	Thickness of Layer at t_0 , H (ft)	Material Type ¹	Effective Stress at Midpoint of Layer at t_0 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_0 , σ'_{i-bott} (psf)	Effective Stress at Midpoint of Layer at t_1 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_1 , $\sigma'_{i-bott1}$ (psf)	Effective Stress at Midpoint of Layer at t_2 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_2 , $\sigma'_{i-bott2}$ (psf)	Consolidation of Layer from t_0 to t_1 , due to Final Cover Placement and Dewatering, δ_{c1} , (ft)	Consolidation of Layer from t_1 to t_2 due to Dewatering, δ_{c1-2} (ft)
Layer 1	5607.44	5605.88	5604.32	3.12	Int. Cover	157.13	314.26	1877.23	2034.36	1877.23	2034.36	0.27	0.00
Layer 2	5604.32	5604.24	5604.16	0.16	Sand-Slime	323.78	333.30	2043.88	2053.40	2043.88	2053.40	0.02	0.00
Layer 3	5604.16	5604.00	5603.83	0.33	Sand	353.67	374.04	2073.77	2094.14	2073.77	2094.14	0.02	0.00
Layer 4	5603.83	5603.67	5603.50	0.33	Sand-Slime	393.67	413.30	2113.77	2133.40	2113.77	2133.40	0.03	0.00
Layer 5	5603.50	5603.18	5602.85	0.65	Slime	450.07	486.84	2170.17	2206.94	2170.17	2206.94	0.05	0.00
Layer 6	5602.85	5602.44	5602.03	0.82	Sand-Slime	535.61	584.39	2255.71	2304.49	2255.71	2304.49	0.06	0.00
Layer 7	5602.03	5601.78	5601.53	0.50	Slime	612.67	640.96	2332.77	2361.06	2332.77	2361.06	0.04	0.00
Layer 8	5601.53	5601.29	5601.04	0.49	Sand-Slime	670.10	699.25	2390.20	2419.35	2390.20	2419.35	0.03	0.00
Layer 9	5601.04	5600.96	5600.88	0.16	Sand	709.13	719.01	2429.23	2439.11	2429.23	2439.11	0.01	0.00
Layer 10	5600.88	5600.72	5600.55	0.33	Sand-Slime	738.64	758.27	2458.74	2478.37	2458.74	2478.37	0.02	0.00
Layer 11	5600.55	5600.39	5600.22	0.33	Slime	776.94	795.60	2497.03	2515.70	2497.03	2515.70	0.02	0.00
Layer 12	5600.22	5600.06	5599.89	0.33	Sand-Slime	815.23	834.86	2535.33	2554.96	2535.33	2554.96	0.02	0.00
Layer 13	5599.89	5599.48	5599.07	0.82	Slime	881.24	912.03	2601.34	2647.73	2601.34	2647.73	0.05	0.00
Layer 14	5599.07	5598.91	5598.74	0.33	Sand-Slime	921.36	930.69	2667.36	2686.99	2667.36	2686.99	0.02	0.00
Layer 15	5598.74	5598.09	5597.43	1.31	Slime	963.92	997.15	2761.08	2835.18	2761.08	2835.18	0.07	0.00
Layer 16	5597.43	5597.27	5597.10	0.33	Sand-Slime	1006.48	1015.82	2854.81	2874.44	2854.81	2874.44	0.02	0.00
Layer 17	5597.10	5594.48	5591.86	5.24	Slime	1148.72	1281.63	3170.84	3467.23	3170.84	3467.23	0.28	0.00
Layer 18	5591.86	5590.88	5589.89	1.97	Sand-Slime	1337.35	1393.07	3584.42	3667.28	3584.42	3701.60	0.10	0.00
Layer 19	5589.89	5588.40	5588.90	0.99	Slime	1418.18	1443.29	3692.39	3717.50	3757.60	3813.60	0.05	0.00
Layer 20	5588.90	5587.17	5585.44	3.46	Sand-Slime	1541.16	1639.03	3815.37	3913.24	4019.42	4009.34	0.16	0.01

Total Consolidation of Profile at t_1 , $\delta_{c,t1}$ (ft): 1.34

Total Consolidation of Profile at t_2 , $\delta_{c,t2}$ (ft): 0.01

Notes:

¹ From on-site investigation (Tailings Data Analysis Report, MWH, 2015)

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FINAL COVER

5623.82	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
7.95	Thickness of Random/Platform Fill on on top of existing interim cover (ft)	Calculated
1646.57	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5604.90	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report, MWH, 2015)
5600.3	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013)
5595.24	Water surface elevation at t_1 (ft amsl)	
5590.24	Water surface elevation at t_2 (ft amsl)	

3-8N

CONSOLIDATION SETTLEMENT

Soil Layer	Elevation at Top of Layer at t_0 , z_i , (ft amsl) ¹	Elevation at Midpoint of Layer at t_0 , z_{i-mid} , (ft amsl)	Elevation at Bottom of Layer at t_0 , z_{i-bott} , (ft amsl) ¹	Thickness of Layer at t_0 , H (ft)	Material Type ¹	Effective Stress at Midpoint of Layer at t_0 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_0 , σ'_{i-bott} (psf)	Effective Stress at Midpoint of Layer at t_1 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_1 , $\sigma'_{i-bott1}$ (psf)	Effective Stress at Midpoint of Layer at t_2 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_2 , $\sigma'_{i-bott2}$ (psf)	Consolidation of Layer from t_0 to t_1 , due to Final Cover Placement and Dewatering, δ_{c1} , (ft)	Consolidation of Layer from t_1 to t_2 due to Dewatering, δ_{c1-2} , (ft)
Layer 1	5608.37	5606.81	5605.25	3.12	Int. Cover	157.13	314.26	1803.70	1960.83	1803.70	1960.83	0.27	0.00
Layer 2	5605.25	5605.17	5605.09	0.16	Slime	323.31	332.36	1969.88	1978.93	1969.88	1978.93	0.02	0.00
Layer 3	5605.09	5605.01	5604.92	0.17	Sand	342.86	353.35	1989.43	1999.92	1989.43	1999.92	0.01	0.00
Layer 4	5604.92	5604.60	5604.27	0.65	Sand-Slime	392.02	430.68	2038.59	2077.25	2038.59	2077.25	0.06	0.00
Layer 5	5604.27	5604.11	5603.94	0.33	Sand	451.06	471.43	2097.63	2118.00	2097.63	2118.00	0.02	0.00
Layer 6	5603.94	5603.78	5603.61	0.33	Sand-Slime	491.06	510.69	2137.63	2157.26	2137.63	2157.26	0.03	0.00
Layer 7	5603.61	5602.55	5601.48	2.13	Sand	642.19	773.69	2288.76	2420.26	2288.76	2420.26	0.08	0.00
Layer 8	5601.48	5598.45	5595.41	6.07	Sand-Slime	1022.14	1193.83	2781.34	3142.42	2781.34	3142.42	0.32	0.00
Layer 9	5595.41	5595.33	5595.24	0.17	Slime	1198.14	1202.45	3152.03	3151.04	3152.03	3161.65	0.01	0.00
Layer 10	5595.24	5594.18	5593.11	2.13	Sand-Slime	1262.70	1322.95	3211.29	3271.54	3288.35	3415.06	0.10	0.00
Layer 11	5593.11	5591.68	5590.24	2.87	Sand-Slime	1404.13	1485.31	3352.72	3433.90	3585.78	3577.42	0.13	0.01

Total Consolidation of Profile at t_1 , δ_{c-t1} (ft): 1.03

Total Consolidation of Profile at t_2 , δ_{c-t2} (ft): 0.01

Notes:

¹ From on-site investigation (Tailings Data Analysis Report. MWH, 2015)

3-8S

FINAL COVER

5620.45	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
4.25	Thickness of Random/Platform Fill on on top of existing interim cover (ft)	Calculated
1273.89	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5603.50	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report, MWH, 2015)
5600.6	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013)
5590.63	Water surface elevation at t_1 (ft amsl)	
5585.63	Water surface elevation at t_2 (ft amsl)	

3-8S

CONSOLIDATION SETTLEMENT

Soil Layer	Elevation at Top of Layer at t_0 , z_i , (ft amsl) ¹	Elevation at Midpoint of Layer at t_0 , z_{i-mid} , (ft amsl)	Elevation at Bottom of Layer at t_0 , $z_{i-bottom}$, (ft amsl) ¹	Thickness of Layer at t_0 , H (ft)	Material Type ¹	Effective Stress at Midpoint of Layer at t_0 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_0 , $\sigma'_{i-bottom}$ (psf)	Effective Stress at Midpoint of Layer at t_1 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_1 , $\sigma'_{i-bottom1}$ (psf)	Effective Stress at Midpoint of Layer at t_2 , σ'_{i-mid} (psf)	Effective Stress at Bottom of Layer at t_2 , $\sigma'_{i-bottom2}$ (psf)	Consolidation of Layer from t_0 to t_1 , due to Final Cover Placement and Dewatering, δ_{c1} , (ft)	Consolidation of Layer from t_1 to t_2 due to Dewatering, δ_{c1-2} , (ft)
Layer 1	5608.70	5607.15	5605.59	3.11	Int. Cover	156.63	313.25	1430.52	1587.14	1430.52	1587.14	0.24	0.00
Layer 2	5605.59	5605.02	5604.44	1.15	Sand	384.25	455.25	1658.14	1729.14	1658.14	1729.14	0.05	0.00
Layer 3	5604.44	5604.28	5604.11	0.33	Sand-Slime	474.88	494.51	1748.77	1768.40	1748.77	1768.40	0.02	0.00
Layer 4	5604.11	5604.03	5603.95	0.16	Sand	504.39	514.27	1778.28	1788.15	1778.28	1788.15	0.01	0.00
Layer 5	5603.95	5603.54	5603.13	0.82	Sand-Slime	563.04	611.82	1836.93	1885.71	1836.93	1885.71	0.05	0.00
Layer 6	5603.13	5601.33	5599.52	3.61	Sand	834.69	990.80	2108.58	2331.45	2108.58	2331.45	0.10	0.00
Layer 7	5599.52	5599.36	5599.19	0.33	Sand-Slime	1000.13	1009.46	2351.08	2370.71	2351.08	2370.71	0.01	0.00
Layer 8	5599.19	5599.03	5598.86	0.33	Sand	1019.54	1029.62	2391.09	2411.46	2391.09	2411.46	0.01	0.00
Layer 9	5598.86	5596.89	5594.92	3.94	Sand-Slime	1141.06	1252.51	2645.83	2880.21	2645.83	2880.21	0.17	0.00
Layer 10	5594.92	5594.84	5594.76	0.16	Slime	1256.57	1260.63	2889.26	2898.31	2889.26	2898.31	0.01	0.00
Layer 11	5594.76	5594.60	5594.43	0.33	Sand-Slime	1269.96	1279.30	2917.94	2937.57	2917.94	2937.57	0.01	0.00
Layer 12	5594.43	5594.11	5593.78	0.65	Slime	1295.78	1312.27	2974.33	3011.10	2974.33	3011.10	0.03	0.00
Layer 13	5593.78	5593.62	5593.45	0.33	Sand-Slime	1321.60	1330.94	3030.73	3050.36	3030.73	3050.36	0.01	0.00
Layer 14	5593.45	5589.54	5585.63	7.82	Sand-Slime	1552.13	1773.32	3447.52	3668.72	3515.54	3492.75	0.33	0.01

Total Consolidation of Profile at t_1 , $\delta_{c,t1}$ (ft): 1.06

Total Consolidation of Profile at t_2 , $\delta_{c,t2}$ (ft): 0.01

Notes:

¹ From on-site investigation (Tailings Data Analysis Report, MWH, 2015)

ATTACHMENT F.2
CREEP SETTLEMENT CALCULATIONS

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Notes

t_0 corresponds to beginning of final cover placement
 t_1 corresponds to dewatering of the tailings to a level 5 feet above the liner
 t_2 corresponds to completion of dewatering

Assumes 99% of consolidation due to existing stress conditions has taken place

SOIL PROPERTIES

TAILINGS

Specific Gravity, G_s

2.70	Specific gravity of tailing sands, $G_{s-TS\text{and}}$	Based on lab testing performed on uranium tailings sands and presented in Keshian and Rager (1988)
2.80	Specific gravity of tailing sand-slimes, G_{s-TS-S}	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015)
2.86	Specific gravity of tailing slimes, $G_{s-TS\text{lime}}$	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015)

Fines Content

18%	Fines content of tailings sands (%)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015)
47%	Fines content of tailings sand-slimes (%)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015)
71%	Fines content of tailings slimes (%)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015)

Dry Unit Weight, γ_d

97	In-situ dry unit weight of tailings sands at t_0 , $\gamma_{d0-TS\text{and}}$ (pcf)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015)
88	In-situ dry unit weight of tailings sand-slimes at t_0 , $\gamma_{d0-TS-S}$ (pcf)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015)
78	In-situ dry unit weight of tailings slimes at t_0 , $\gamma_{d0-TS\text{lime}}$ (pcf)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015)

Saturated Unit Weight, γ_{sat}

123	In-situ saturated unit weight of tailings sands at t_0 , $\gamma_{sat0-TS\text{and}}$ (pcf)	Calculated
119	In-situ saturated unit weight of tailings sand-slimes at t_0 , $\gamma_{sat0-TS-S}$ (pcf)	Calculated
113	In-situ saturated unit weight of tailings slimes at t_0 , $\gamma_{sat0-TS\text{lime}}$ (pcf)	Calculated

Moist Unit Weight, γ_m

123	Moist unit weight of tailings sands, $\gamma_{m-TS\text{and}}$ (pcf)	Calculated, assuming 100% degree of saturation (conservative estimate of loading from these layers)
119	Moist unit weight of tailings sand-slimes, γ_{m-TS-S} (pcf)	Calculated, assuming 100% degree of saturation (conservative estimate of loading from these layers)
113	Moist unit weight of tailings slimes, $\gamma_{m-TS\text{lime}}$ (pcf)	Calculated, assuming 100% degree of saturation (conservative estimate of loading from these layers)

Void Ratio, e

0.74	Void ratio of tailing sands at t_0 , $e_{0-TS\text{and}}$	Calculated
0.99	Void ratio of tailing sand-slimes at t_0 , e_{0-TS-S}	Calculated
1.29	Void ratio of tailing slimes at t_0 , $e_{0-TS\text{lime}}$	Calculated

Saturated Water Content, w_{sat}

27%	Saturated water content of tailings sands at t_0 , $w_{sat0-TS\text{and}}$ (%)	Calculated
35%	Saturated water content of tailings sand-slimes at t_0 , $w_{sat0-TS-S}$ (%)	Calculated
45%	Saturated water content of tailings slimes at t_0 , $w_{sat0-TS\text{lime}}$ (%)	Calculated

Water Content of Moist Tailings, w_{m-T}

27%	Water content of moist tailings sands, $w_{m-TS\text{and}}$ (%)	Calculated, assuming 100% saturation (conservative value used to estimate loading from these layers, actual long-term water content will be lower)
35%	Water content of moist tailings sand-slimes, w_{m-TS-S} (%)	Calculated, assuming 100% saturation (conservative value used to estimate loading from these layers, actual long-term water content will be lower)
45%	Water content of moist tailings slimes, $w_{m-TS\text{lime}}$ (%)	Calculated, assuming 100% saturation (conservative value used to estimate loading from these layers, actual long-term water content will be lower)

Compression Index, C_c

0.12	Compression index of tailings sands, $C_{c-TS\text{and}}$	Based on lab testing performed on uranium tailings sands and presented in Keshian and Rager (1988)
0.24	Compression index of tailings sand-slimes, C_{c-TS-S}	Median value from lab testing of tailings sand-slimes samples obtained on-site (Tailings Data Analysis Report. MWH, 2015)
0.28	Compression index of tailings slimes, $C_{c-TS\text{lime}}$	Median value from lab testing of tailings slimes samples obtained on-site (Tailings Data Analysis Report. MWH, 2015)

Normalized Blow Count, N_{60}

17	Normalized Blow Count for saturated tailings sands, $N_{60-TS\text{and}}$	
7	Normalized Blow Count for saturated tailings sand-slimes, $N_{60-TS-S}$	
4	Normalized Blow Count for saturated tailings slimes, $N_{60-TS\text{lime}}$	

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23	Normalized Blow Count for unsaturated tailings sands, $N_{60-TS_{sand}}$
14	Normalized Blow Count for unsaturated tailings sand-slimes, $N_{60-TS-S}$
10	Normalized Blow Count for unsaturated tailings slimes, $N_{60-TS_{slime}}$

Blow counts for material types calculated using method presented in Guide to Cone Penetration Testing for Geotechnical Engineering, 5th Ed. (Robertson and Cabal, 2012).

Other

62.4	Unit Weight of Water, γ_w
5.0	Height of water table above liner at t_1 , H_{sat-1} (ft)
0.0	Height of water table above liner at t_2 , H_{sat-2} (ft)
82.4	Atmospheric Pressure, P_a (kPa)
1722.0	Atmospheric Pressure, P_a (psf)
5.2%	Long-term moisture content of tailings, $w_{tailings}$ (%)
0.020	Ratio of Secondary Compression Index to Primary Compression Index, C_α/C_c

Assumed for end of active maintenance

Calculated assuming elev=5600' amsl. http://www.engineeringtoolbox.com/air-altitude-pressure-d_462.html

Unit conversion calculation

From Attachment H - Radon Emanation Modeling including with this submittal

Estimated from laboratory results presented in MWH (2015b), upper bound average C_α for sand-slime and slime tailings of 0.02

COVER SOIL

Specific Gravity, G_s

2.61	Specific gravity of topsoil, $G_{s-topsoil}$
2.62	Specific gravity of rock mulch, $G_{s-mulch}$
2.63	Specific gravity of cover soil, $G_{s-cover}$

From Attachment H - Radon Emanation Modeling including with this submittal

From Attachment H - Radon Emanation Modeling including with this submittal

From Attachment H - Radon Emanation Modeling including with this submittal

Unit Weight, γ

118.0	Maximum dry unit weight of cover soil $\gamma_{cover-max}$ (pcf)
100.7	Moist unit weight of cover soil at 80% relative compaction, $\gamma_{cover80}$ (pcf)
107.0	Moist unit weight of cover soil at 85% relative compaction, $\gamma_{cover85}$ (pcf)
119.6	Moist unit weight of cover soil at 95% relative compaction, $\gamma_{cover95}$ (pcf)
127.5	Saturated unit weight of cover soil at 80% relative compaction, $\gamma_{cover80-sat}$ (pcf)
100	Dry unit weight of topsoil layer at 85% relative compaction, $\gamma_{topsoil85}$ (pcf)
105	Moist unit weight of topsoil layer at 85% relative compaction, $\gamma_{topsoil85}$ (pcf)
106	Dry unit weight of rock mulch layer at 85% relative compaction, $\gamma_{mulch85}$ (pcf)
110	Moist unit weight of rock mulch layer at 85% relative compaction, $\gamma_{mulch85}$ (pcf)

Average calculated from laboratory testing results (UWM, 2012)

Calculated

Calculated

Calculated

Calculated

From Attachment H - Radon Emanation Modeling including with this submittal

Calculated

From Attachment H - Radon Emanation Modeling including with this submittal

From Attachment H - Radon Emanation Modeling including with this submittal

Void Ratio, e

0.74	Void Ratio of cover soil at 80% relative compaction, $e_{cover80}$
0.64	Void Ratio of cover soil at 85% relative compaction, $e_{cover85}$
0.46	Void Ratio of cover soil at 95% relative compaction, $e_{cover95}$
0.61	Void Ratio of topsoil at 85% relative compaction, $e_{topsoil85}$
0.54	Void Ratio of rock mulch at 85% relative compaction, $e_{mulch85}$

Calculated

Calculated

Calculated

Calculated from porosity presented in Attachment H - Radon Emanation Modeling including with this submittal

Calculated from porosity presented in Attachment H - Radon Emanation Modeling including with this submittal

Other

6.7%	Long-term moisture content of cover soil, w_{cover} (%)
5.2%	Long-term moisture content of topsoil, $w_{topsoil}$ (%)
4.0%	Long-term moisture content of rock mulch, $w_{rockmulch}$ (%)
0.14	Compression index of cover soil, $C_{c-cover}$

Estimated based on measured 15bar water content. (UWM, 2012)

From Attachment H - Radon Emanation Modeling including with this submittal

From Attachment H - Radon Emanation Modeling including with this submittal

Calculated from empirical equation for soil types similar to cover material (as presented in Holtz and Kovacs, 1981. Page 341). $C_c = 0.30*(e_0 - 0.27)$

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2W2

FINAL COVER

5625.87	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
4.00	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
2.02	Thickness of Random/Platform Fill on on top of existing interim cover (ft)	Calculated
1111.60	Additional Stress due to Final Cover Placement $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5613.10	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report, MWH, 2015)
5607.7	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013).
5598.51	Water surface elevation at t_1 (ft amsl)	
5593.51	Water surface elevation at t_2 (ft amsl)	

2W2

CREEP SETTLEMENT

Soil Layer	Material Type ¹	Thickness of Layer at t_0 , H (ft)	Elevation at Top of Layer at t_1 , z_{1-top} (ft amsl)	Elevation at Midpoint of Layer at t_1 , z_{1-mid} (ft amsl)	Elevation at Bottom of Layer at t_1 , z_{1-bott} (ft amsl)	Thickness of Layer at t_1 , H (ft)	Height above liner (ft)	Effective Stress at Midpoint of Layer at t_1 , σ'_{1-mid} (psf)	Effective Stress at Bottom of Layer at t_1 , σ'_{1-bott} (psf)	Void Ratio at t_0 , e_0	Void Ratio at t_1 , e_1	Secondary Compression Index, C_α	Change in Void Ratio due to 1000 years of Creep, Δe	Final Void Ratio After 1,000 years, e_{final}	Settlement due to 1000 years of Creep, δ_{creep} (ft)
Erosion Protection Layer	Erosion Protection Layer		5624.78	5624.53	5624.28	0.50	31.27	NA	NA	NA	NA	NA	NA	NA	NA
Rooting Zone	Rooting Zone		5624.28	5622.53	5620.78	3.50	30.77	NA	NA	NA	NA	NA	NA	NA	NA
High-Compaction Layer	High-Compaction Layer		5620.78	5618.78	5616.78	4.00	27.27	NA	NA	NA	NA	NA	NA	NA	NA
Platform Fill	Platform Fill		5616.78	5615.77	5614.76	2.02	23.27	NA	NA	NA	NA	NA	NA	NA	NA
Layer 1	Int. Cover		5614.76	5613.32	5611.88	2.88	21.25	NA	NA	NA	NA	NA	NA	NA	NA
Layer 2	Sand-Slime		5611.88	5611.42	5610.97	0.91	18.37	NA	NA	NA	NA	NA	NA	NA	NA
Layer 3	Slime		5610.97	5610.89	5610.81	0.16	17.46	NA	NA	NA	NA	NA	NA	NA	NA
Layer 4	Sand		5610.81	5610.65	5610.50	0.31	17.30	NA	NA	NA	NA	NA	NA	NA	NA
Layer 5	Sand-Slime		5610.50	5610.42	5610.34	0.16	16.99	NA	NA	NA	NA	NA	NA	NA	NA
Layer 6	Slime		5610.34	5609.95	5609.57	0.77	16.83	NA	NA	NA	NA	NA	NA	NA	NA
Layer 7	Sand-Slime		5609.57	5609.49	5609.42	0.15	16.06	NA	NA	NA	NA	NA	NA	NA	NA
Layer 8	Slime		5609.42	5609.18	5608.95	0.46	15.91	NA	NA	NA	NA	NA	NA	NA	NA
Layer 9	Sand-Slime		5608.95	5608.71	5608.48	0.48	15.44	NA	NA	NA	NA	NA	NA	NA	NA
Layer 10	Slime		5608.48	5607.93	5607.39	1.09	14.97	NA	NA	NA	NA	NA	NA	NA	NA
Layer 11	Sand-Slime		5607.39	5607.23	5607.07	0.32	13.88	NA	NA	NA	NA	NA	NA	NA	NA
Layer 12	Slime		5607.07	5606.68	5606.29	0.78	13.56	NA	NA	NA	NA	NA	NA	NA	NA
Layer 13	Sand-Slime		5606.29	5605.97	5605.66	0.63	12.78	NA	NA	NA	NA	NA	NA	NA	NA
Layer 14	Slime		5605.66	5605.42	5605.19	0.47	12.15	NA	NA	NA	NA	NA	NA	NA	NA
Layer 15	Sand-Slime		5605.19	5605.03	5604.87	0.32	11.68	NA	NA	NA	NA	NA	NA	NA	NA
Layer 16	Slime		5604.87	5604.71	5604.56	0.32	11.36	NA	NA	NA	NA	NA	NA	NA	NA
Layer 17	Sand-Slime		5604.56	5604.40	5604.24	0.32	11.05	NA	NA	NA	NA	NA	NA	NA	NA
Layer 18	Slime		5604.24	5604.01	5603.77	0.47	10.73	NA	NA	NA	NA	NA	NA	NA	NA
Layer 19	Sand-Slime		5603.77	5603.61	5603.46	0.32	10.26	NA	NA	NA	NA	NA	NA	NA	NA
Layer 20	Slime		5603.46	5602.99	5602.52	0.94	9.95	NA	NA	NA	NA	NA	NA	NA	NA
Layer 21	Sand-Slime		5602.52	5602.44	5602.36	0.15	9.01	NA	NA	NA	NA	NA	NA	NA	NA
Layer 22	Slime		5602.36	5601.97	5601.58	0.79	8.85	NA	NA	NA	NA	NA	NA	NA	NA
Layer 23	Sand-Slime		5601.58	5601.34	5601.10	0.48	8.07	NA	NA	NA	NA	NA	NA	NA	NA
Layer 24	Slime		5601.10	5601.02	5600.95	0.15	7.59	NA	NA	NA	NA	NA	NA	NA	NA
Layer 25	Sand-Slime		5600.95	5600.87	5600.79	0.15	7.44	NA	NA	NA	NA	NA	NA	NA	NA
Layer 26	Slime		5600.79	5600.40	5600.01	0.79	7.28	NA	NA	NA	NA	NA	NA	NA	NA
Layer 27	Sand-Slime		5600.01	5599.62	5599.22	0.79	6.50	NA	NA	NA	NA	NA	NA	NA	NA
Layer 28	Slime		5599.22	5598.51	5597.80	1.42	5.71	1548.29	3096.58	1.29	1.19	0.006	0.023	1.17	0.015
Layer 29	Sand-Slime		5597.80	5597.73	5597.65	0.15	4.29	1552.82	3105.63	0.99	0.90	0.005	0.020	0.88	0.002
Layer 30	Slime		5597.65	5597.34	5597.02	0.63	4.14	1569.56	3139.11	1.29	1.19	0.006	0.023	1.17	0.007
Layer 31	Sand-Slime		5597.02	5596.70	5596.39	0.63	3.51	1588.23	3176.45	0.99	0.91	0.005	0.020	0.89	0.007
Layer 32	Slime		5596.39	5596.23	5596.08	0.31	2.88	1596.34	3192.68	1.29	1.20	0.006	0.023	1.17	0.003
Layer 33	Sand-Slime		5596.08	5595.76	5595.44	0.63	2.57	1615.01	3230.02	0.99	0.91	0.005	0.020	0.89	0.007
Layer 34	Sand-Slime		5595.44	5594.48	5593.51	1.93	1.93	1671.86	3343.73	0.99	0.91	0.005	0.020	0.89	0.020
														TOTAL:	0.06

Notes:

¹ From on-site investigation (Tailings Data Analysis Report, MWH, 2011)

2W3

FINAL COVER

5626.27	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
4.00	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
2.55	Thickness of Random/Platform Fill on top of existing interim cover (ft)	Calculated
1164.98	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5613.80	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report. MWH, 2015)
5607.6	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013).
5597.75	Water surface elevation at t_1 (ft amsl)	
5592.75	Water surface elevation at t_2 (ft amsl)	

2W3

CREEP SETTLEMENT

Soil Layer	Material Type ¹	Elevation at Top of Layer at t_0 , z_{i-top1} (ft amsl)	Elevation at Midpoint of Layer at t_1 , z_{i-mid1} (ft amsl)	Elevation at Bottom of Layer at t_1 , $z_{i-bott1}$ (ft amsl)	Thickness of Layer at t_1 , H (ft)	Height above liner (ft)	Effective Stress at Midpoint of Layer at t_1 , σ'_{1-mid1} (psf)	Effective Stress at Bottom of Layer at t_1 , $\sigma'_{1-bott1}$ (psf)	Void Ratio at t_0 , e_0	Void Ratio at t_1 , e_1	Secondary Compression Index, C_e	Change in Void Ratio due to 1000 years of Creep, Δe	Final Void Ratio After 1,000 years, e_{final}	Settlement due to 1000 years of Creep, δ_{creep} (ft)
Erosion Protection Layer	Erosion Protection Layer	5625.12	5624.87	5624.62	0.50	32.37	NA	NA	NA	NA	NA	NA	NA	NA
Rooting Zone	Rooting Zone	5624.62	5622.87	5621.12	3.50	31.87	NA	NA	NA	NA	NA	NA	NA	NA
High-Compaction Layer	High-Compaction Layer	5621.12	5619.12	5617.12	4.00	28.37	NA	NA	NA	NA	NA	NA	NA	NA
Platform Fill	Platform Fill	5617.12	5615.85	5614.57	2.55	24.37	NA	NA	NA	NA	NA	NA	NA	NA
Layer 1	Int. Cover	5614.57	5613.13	5611.70	2.88	21.82	NA	NA	NA	NA	NA	NA	NA	NA
Layer 2	Sand-Slime	5611.70	5611.47	5611.24	0.45	18.95	NA	NA	NA	NA	NA	NA	NA	NA
Layer 3	Slime	5611.24	5611.17	5611.09	0.16	18.49	NA	NA	NA	NA	NA	NA	NA	NA
Layer 4	Sand-Slime	5611.09	5610.63	5610.17	0.91	18.34	NA	NA	NA	NA	NA	NA	NA	NA
Layer 5	Slime	5610.17	5610.02	5609.86	0.31	17.42	NA	NA	NA	NA	NA	NA	NA	NA
Layer 6	Sand-Slime	5609.86	5609.09	5608.31	1.55	17.11	NA	NA	NA	NA	NA	NA	NA	NA
Layer 7	Slime	5608.31	5608.23	5608.15	0.16	15.56	NA	NA	NA	NA	NA	NA	NA	NA
Layer 8	Sand-Slime	5608.15	5607.92	5607.68	0.47	15.40	NA	NA	NA	NA	NA	NA	NA	NA
Layer 9	Slime	5607.68	5607.61	5607.53	0.15	14.93	NA	NA	NA	NA	NA	NA	NA	NA
Layer 10	Sand-Slime	5607.53	5607.45	5607.37	0.16	14.78	NA	NA	NA	NA	NA	NA	NA	NA
Layer 11	Slime	5607.37	5607.21	5607.04	0.32	14.62	NA	NA	NA	NA	NA	NA	NA	NA
Layer 12	Sand-Slime	5607.04	5606.42	5605.80	1.24	14.29	NA	NA	NA	NA	NA	NA	NA	NA
Layer 13	Slime	5605.80	5605.65	5605.49	0.31	13.05	NA	NA	NA	NA	NA	NA	NA	NA
Layer 14	Sand-Slime	5605.49	5604.47	5603.45	2.05	12.74	NA	NA	NA	NA	NA	NA	NA	NA
Layer 15	Slime	5603.45	5602.82	5602.19	1.25	10.70	NA	NA	NA	NA	NA	NA	NA	NA
Layer 16	Sand-Slime	5602.19	5601.25	5600.31	1.89	9.44	NA	NA	NA	NA	NA	NA	NA	NA
Layer 17	Slime	5600.31	5600.15	5599.99	0.32	7.56	NA	NA	NA	NA	NA	NA	NA	NA
Layer 18	Sand-Slime	5599.99	5599.84	5599.68	0.31	7.24	NA	NA	NA	NA	NA	NA	NA	NA
Layer 19	Slime	5599.68	5598.82	5597.95	1.73	6.93	NA	NA	NA	NA	NA	NA	NA	NA
Layer 20	Sand-Slime	5597.95	5597.64	5597.33	0.62	5.20	3205.98	3230.29	0.99	0.90	0.005	0.020	0.88	0.006
Layer 21	Slime	5597.33	5597.17	5597.01	0.32	4.58	3238.66	3247.03	1.29	1.19	0.006	0.023	1.17	0.003
Layer 22	Sand-Slime	5597.01	5596.39	5595.76	1.26	4.26	3284.09	3321.14	0.99	0.90	0.005	0.020	0.88	0.013
Layer 23	Slime	5595.76	5595.44	5595.12	0.63	3.01	3337.88	3354.62	1.29	1.20	0.006	0.023	1.17	0.007
Layer 24	Sand-Slime	5595.12	5594.97	5594.81	0.32	2.37	3363.96	3373.29	0.99	0.91	0.005	0.020	0.89	0.003
Layer 25	Slime	5594.81	5594.57	5594.34	0.47	2.06	3385.72	3398.15	1.29	1.20	0.006	0.023	1.17	0.005
Layer 26	Sand-Slime	5594.34	5594.18	5594.02	0.32	1.59	3407.48	3416.81	0.99	0.91	0.005	0.020	0.89	0.003
Layer 27	Sand-Slime	5594.02	5593.38	5592.75	1.27	1.27	3454.15	3491.49	0.99	0.91	0.005	0.020	0.89	0.013
													TOTAL:	0.05

Notes:

¹ From on-site investigation (Tailings Data Analysis Report. MWH, 2015)

2W4-C

FINAL COVER

5626.19	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
4.00	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
1.95	Thickness of Random/Platform Fill on top of existing interim cover (ft)	Calculated
1104.55	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5611.20	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report. MWH, 2015)
5608.1	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013).
5593.51	Water surface elevation at t_1 (ft amsl)	
5588.51	Water surface elevation at t_2 (ft amsl)	

2W4-C

CREEP SETTLEMENT

Soil Layer	Material Type ¹	Elevation at Top of Layer at t_1 , z_{i-top1} (ft amsl)	Elevation at Midpoint of Layer at t_1 , z_{i-mid1} (ft amsl)	Elevation at Bottom of Layer at t_1 , $z_{i-bott1}$ (ft amsl)	Thickness of Layer at t_1 , H (ft)	Height above liner (ft)	Effective Stress at Midpoint of Layer at t_1 , σ'_{i-mid1} (psf)	Effective Stress at Bottom of Layer at t_1 , $\sigma'_{i-bott1}$ (psf)	Void Ratio at t_1 , e_1	Void Ratio at t_1 , e_1	Secondary Compression Index, C_e	Change in Void Ratio due to 1000 years of Creep, Δe	Final Void Ratio After 1,000 years, e_{final}	Settlement due to 1000 years of Creep, δ_{creep} (ft)
Erosion Protection Layer	Erosion Protection Layer	5624.90	5624.65	5624.40	0.50	36.39	NA	NA	NA	NA	NA	NA	NA	NA
Rooting Zone	Rooting Zone	5624.40	5622.65	5620.90	3.50	35.89	NA	NA	NA	NA	NA	NA	NA	NA
High-Compaction Layer	High-Compaction Layer	5620.90	5618.90	5616.90	4.00	32.39	NA	NA	NA	NA	NA	NA	NA	NA
Platform Fill	Platform Fill	5616.90	5615.92	5614.95	1.95	28.39	NA	NA	NA	NA	NA	NA	NA	NA
Layer 1	Int. Cover	5614.95	5613.50	5612.05	2.89	26.44	NA	NA	NA	NA	NA	NA	NA	NA
Layer 2	Sand	5612.05	5611.98	5611.90	0.15	23.54	NA	NA	NA	NA	NA	NA	NA	NA
Layer 3	Sand-Slime	5611.90	5610.36	5608.82	3.09	23.39	NA	NA	NA	NA	NA	NA	NA	NA
Layer 4	Slime	5608.82	5608.73	5608.65	0.16	20.31	NA	NA	NA	NA	NA	NA	NA	NA
Layer 5	Sand-Slime	5608.65	5607.48	5606.30	2.36	20.14	NA	NA	NA	NA	NA	NA	NA	NA
Layer 6	Slime	5606.30	5606.14	5605.99	0.31	17.79	NA	NA	NA	NA	NA	NA	NA	NA
Layer 7	Sand-Slime	5605.99	5605.83	5605.68	0.32	17.48	NA	NA	NA	NA	NA	NA	NA	NA
Layer 8	Slime	5605.68	5605.59	5605.51	0.16	17.17	NA	NA	NA	NA	NA	NA	NA	NA
Layer 9	Sand-Slime	5605.51	5604.73	5603.94	1.57	17.00	NA	NA	NA	NA	NA	NA	NA	NA
Layer 10	Slime	5603.94	5603.86	5603.79	0.15	15.43	NA	NA	NA	NA	NA	NA	NA	NA
Layer 11	Sand-Slime	5603.79	5603.63	5603.47	0.32	15.28	NA	NA	NA	NA	NA	NA	NA	NA
Layer 12	Slime	5603.47	5603.31	5603.15	0.32	14.96	NA	NA	NA	NA	NA	NA	NA	NA
Layer 13	Sand-Slime	5603.15	5601.35	5599.54	3.61	14.64	NA	NA	NA	NA	NA	NA	NA	NA
Layer 14	Slime	5599.54	5598.99	5598.44	1.10	11.03	NA	NA	NA	NA	NA	NA	NA	NA
Layer 15	Sand-Slime	5598.44	5598.04	5597.65	0.79	9.93	NA	NA	NA	NA	NA	NA	NA	NA
Layer 16	Slime	5597.65	5597.57	5597.50	0.15	9.14	NA	NA	NA	NA	NA	NA	NA	NA
Layer 17	Sand-Slime	5597.50	5597.26	5597.03	0.47	8.99	NA	NA	NA	NA	NA	NA	NA	NA
Layer 18	Slime	5597.03	5596.87	5596.71	0.32	8.52	NA	NA	NA	NA	NA	NA	NA	NA
Layer 19	Sand-Slime	5596.71	5596.32	5595.92	0.79	8.20	NA	NA	NA	NA	NA	NA	NA	NA
Layer 20	Slime	5595.92	5595.53	5595.14	0.79	7.41	NA	NA	NA	NA	NA	NA	NA	NA
Layer 21	Sand-Slime	5595.14	5594.82	5594.51	0.63	6.63	NA	NA	NA	NA	NA	NA	NA	NA
Layer 22	Slime	5594.51	5594.43	5594.35	0.15	6.00	NA	NA	NA	NA	NA	NA	NA	NA
Layer 23	Sand-Slime	5594.35	5594.19	5594.04	0.32	5.84	NA	NA	NA	NA	NA	NA	NA	NA
Layer 24	Slime	5594.04	5593.88	5593.72	0.32	5.53	NA	NA	NA	NA	NA	NA	NA	NA
Layer 25	Sand-Slime	5593.72	5591.67	5589.63	4.09	5.21	3825.33	3945.83	0.99	0.91	0.005	0.020	0.89	0.042
Layer 26	Sand-Slime	5589.63	5589.07	5588.51	1.12	1.12	3978.64	4011.45	0.99	0.91	0.005	0.020	0.89	0.011
													TOTAL:	0.05

Notes:

¹ From on-site investigation (Tailings Data Analysis Report. MWH, 2015)

2W5-C

FINAL COVER

5626.29	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
4.00	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
2.43	Thickness of Random/Platform Fill on top of existing interim cover (ft)	Calculated
1152.89	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5604.20	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report. MWH, 2015)
5604.2	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013).
5589.01	Water surface elevation at t_1 (ft amsl)	
5584.01	Water surface elevation at t_2 (ft amsl)	

2W5-C

CREEP SETTLEMENT

Soil Layer	Material Type ¹	Elevation at Top of Layer at t_1 , z_{i-top1} (ft amsl)	Elevation at Midpoint of Layer at t_1 , z_{i-mid1} (ft amsl)	Elevation at Bottom of Layer at t_1 , $z_{i-bott1}$ (ft amsl)	Thickness of Layer at t_1 , H (ft)	Height above liner (ft)	Effective Stress at Midpoint of Layer at t_1 , σ'_{i-mid1} (psf)	Effective Stress at Bottom of Layer at t_1 , $\sigma'_{i-bott1}$ (psf)	Void Ratio at t_0 , e_0	Void Ratio at t_1 , e_1	Secondary Compression Index, C_α	Change in Void Ratio due to 1000 years of Creep, Δe	Final Void Ratio After 1,000 years, e_{final}	Settlement due to 1000 years of Creep, δ_{creep} (ft)
Erosion Protection Layer	Erosion Protection Layer	5625.03	5624.78	5624.53	0.50	41.02	NA	NA	NA	NA	NA	NA	NA	NA
Rooting Zone	Rooting Zone	5624.53	5622.78	5621.03	3.50	40.52	NA	NA	NA	NA	NA	NA	NA	NA
High-Compaction Layer	High-Compaction Layer	5621.03	5619.03	5617.03	4.00	37.02	NA	NA	NA	NA	NA	NA	NA	NA
Platform Fill	Platform Fill	5617.03	5615.82	5614.60	2.43	33.02	NA	NA	NA	NA	NA	NA	NA	NA
Layer 1	Int. Cover	5614.60	5613.16	5611.73	2.88	30.59	NA	NA	NA	NA	NA	NA	NA	NA
Layer 2	Sand-Slime	5611.73	5611.57	5611.42	0.30	27.72	NA	NA	NA	NA	NA	NA	NA	NA
Layer 3	Sand	5611.42	5611.10	5610.79	0.63	27.41	NA	NA	NA	NA	NA	NA	NA	NA
Layer 4	Sand-Slime	5610.79	5610.64	5610.49	0.30	26.78	NA	NA	NA	NA	NA	NA	NA	NA
Layer 5	Sand	5610.49	5610.17	5609.85	0.64	26.48	NA	NA	NA	NA	NA	NA	NA	NA
Layer 6	Sand-Slime	5609.85	5609.08	5608.30	1.55	25.84	NA	NA	NA	NA	NA	NA	NA	NA
Layer 7	Sand	5608.30	5608.06	5607.82	0.48	24.29	NA	NA	NA	NA	NA	NA	NA	NA
Layer 8	Sand-Slime	5607.82	5604.18	5600.53	7.29	23.81	NA	NA	NA	NA	NA	NA	NA	NA
Layer 9	Sand	5600.53	5600.45	5600.37	0.16	16.52	NA	NA	NA	NA	NA	NA	NA	NA
Layer 10	Sand-Slime	5600.37	5599.58	5598.79	1.58	16.36	NA	NA	NA	NA	NA	NA	NA	NA
Layer 11	Slime	5598.79	5598.63	5598.47	0.32	14.78	NA	NA	NA	NA	NA	NA	NA	NA
Layer 12	Sand-Slime	5598.47	5596.49	5594.51	3.96	14.46	NA	NA	NA	NA	NA	NA	NA	NA
Layer 13	Slime	5594.51	5594.12	5593.72	0.79	10.50	NA	NA	NA	NA	NA	NA	NA	NA
Layer 14	Sand-Slime	5593.72	5593.48	5593.25	0.47	9.71	NA	NA	NA	NA	NA	NA	NA	NA
Layer 15	Slime	5593.25	5593.17	5593.08	0.16	9.24	NA	NA	NA	NA	NA	NA	NA	NA
Layer 16	Sand-Slime	5593.08	5592.29	5591.50	1.58	9.07	NA	NA	NA	NA	NA	NA	NA	NA
Layer 17	Slime	5591.50	5591.34	5591.18	0.32	7.49	NA	NA	NA	NA	NA	NA	NA	NA
Layer 18	Sand-Slime	5591.18	5589.29	5587.39	3.79	7.17	4236.82	4375.75	0.99	0.92	0.005	0.020	0.90	0.039
Layer 19	Slime	5587.39	5587.23	5587.07	0.32	3.38	4384.12	4392.49	1.29	1.21	0.006	0.023	1.19	0.003
Layer 20	Sand	5587.07	5586.67	5586.27	0.80	3.06	4417.53	4442.57	0.74	0.70	0.002	0.010	0.69	0.005
Layer 21	Sand-Slime	5586.27	5586.11	5585.95	0.32	2.26	4451.90	4461.24	0.99	0.92	0.005	0.020	0.90	0.003
Layer 22	Sand	5585.95	5585.79	5585.63	0.32	1.94	4471.31	4481.39	0.74	0.70	0.002	0.010	0.69	0.002
Layer 23	Sand-Slime	5585.63	5584.82	5584.01	1.62	1.62	4528.63	4575.86	0.99	0.92	0.005	0.020	0.90	0.016
													TOTAL:	0.07

Notes:

¹ From on-site investigation (Tailings Data Analysis Report. MWH, 2015)

2W6-S

FINAL COVER

5625.41	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
4.00	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
1.56	Thickness of Random/Platform Fill on top of existing interim cover (ft)	Calculated
1065.26	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5604.40	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report. MWH, 2015)
5604.4	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013).
5588.59	Water surface elevation at t_1 (ft amsl)	
5583.59	Water surface elevation at t_2 (ft amsl)	

2W6-S

CREEP SETTLEMENT

Soil Layer	Material Type ¹	Elevation at Top of Layer at t_1 , z_{i-top1} (ft amsl)	Elevation at Midpoint of Layer at t_1 , z_{i-mid1} (ft amsl)	Elevation at Bottom of Layer at t_1 , $z_{i-bott1}$ (ft amsl)	Thickness of Layer at t_1 , H (ft)	Height above liner (ft)	Effective Stress at Midpoint of Layer at t_1 , σ'_{i-mid1} (psf)	Effective Stress at Bottom of Layer at t_1 , $\sigma'_{i-bott1}$ (psf)	Void Ratio at t_0 , e_0	Void Ratio at t_1 , e_1	Secondary Compression Index, C_e	Change in Void Ratio due to 1000 years of Creep, Δe	Final Void Ratio After 1,000 years, e_{final}	Settlement due to 1000 years of Creep, δ_{creep} (ft)
Erosion Protection Layer	Erosion Protection Layer	5624.12	5623.87	5623.62	0.50	40.53	NA	NA	NA	NA	NA	NA	NA	NA
Rooting Zone	Rooting Zone	5623.62	5621.87	5620.12	3.50	40.03	NA	NA	NA	NA	NA	NA	NA	NA
High-Compaction Layer	High-Compaction Layer	5620.12	5618.12	5616.12	4.00	36.53	NA	NA	NA	NA	NA	NA	NA	NA
Platform Fill	Platform Fill	5616.12	5615.34	5614.56	1.56	32.53	NA	NA	NA	NA	NA	NA	NA	NA
Layer 1	Int. Cover	5614.56	5613.11	5611.67	2.90	30.97	NA	NA	NA	NA	NA	NA	NA	NA
Layer 2	Sand-Slime	5611.67	5611.44	5611.21	0.45	28.08	NA	NA	NA	NA	NA	NA	NA	NA
Layer 3	Sand	5611.21	5611.13	5611.05	0.16	27.62	NA	NA	NA	NA	NA	NA	NA	NA
Layer 4	Sand-Slime	5611.05	5610.67	5610.28	0.77	27.46	NA	NA	NA	NA	NA	NA	NA	NA
Layer 5	Sand	5610.28	5610.04	5609.81	0.47	26.69	NA	NA	NA	NA	NA	NA	NA	NA
Layer 6	Sand-Slime	5609.81	5608.87	5607.94	1.87	26.22	NA	NA	NA	NA	NA	NA	NA	NA
Layer 7	Slime	5607.94	5607.78	5607.62	0.32	24.35	NA	NA	NA	NA	NA	NA	NA	NA
Layer 8	Sand	5607.62	5607.47	5607.31	0.31	24.03	NA	NA	NA	NA	NA	NA	NA	NA
Layer 9	Sand-Slime	5607.31	5606.60	5605.89	1.42	23.72	NA	NA	NA	NA	NA	NA	NA	NA
Layer 10	Slime	5605.89	5605.73	5605.57	0.32	22.30	NA	NA	NA	NA	NA	NA	NA	NA
Layer 11	Sand-Slime	5605.57	5605.33	5605.10	0.47	21.98	NA	NA	NA	NA	NA	NA	NA	NA
Layer 12	Slime	5605.10	5604.78	5604.46	0.64	21.51	NA	NA	NA	NA	NA	NA	NA	NA
Layer 13	Sand-Slime	5604.46	5604.15	5603.83	0.63	20.87	NA	NA	NA	NA	NA	NA	NA	NA
Layer 14	Slime	5603.83	5603.59	5603.35	0.48	20.24	NA	NA	NA	NA	NA	NA	NA	NA
Layer 15	Sand-Slime	5603.35	5603.27	5603.19	0.15	19.76	NA	NA	NA	NA	NA	NA	NA	NA
Layer 16	Slime	5603.19	5602.00	5600.81	2.38	19.60	NA	NA	NA	NA	NA	NA	NA	NA
Layer 17	Sand-Slime	5600.81	5600.57	5600.34	0.47	17.22	NA	NA	NA	NA	NA	NA	NA	NA
Layer 18	Slime	5600.34	5600.26	5600.17	0.16	16.75	NA	NA	NA	NA	NA	NA	NA	NA
Layer 19	Sand-Slime	5600.17	5600.10	5600.02	0.15	16.58	NA	NA	NA	NA	NA	NA	NA	NA
Layer 20	Slime	5600.02	5599.62	5599.23	0.79	16.43	NA	NA	NA	NA	NA	NA	NA	NA
Layer 21	Sand-Slime	5599.23	5598.67	5598.11	1.11	15.64	NA	NA	NA	NA	NA	NA	NA	NA
Layer 22	Slime	5598.11	5597.72	5597.32	0.79	14.52	NA	NA	NA	NA	NA	NA	NA	NA
Layer 23	Sand-Slime	5597.32	5596.53	5595.74	1.58	13.73	NA	NA	NA	NA	NA	NA	NA	NA
Layer 24	Slime	5595.74	5595.50	5595.26	0.47	12.15	NA	NA	NA	NA	NA	NA	NA	NA
Layer 25	Sand-Slime	5595.26	5595.10	5594.95	0.32	11.67	NA	NA	NA	NA	NA	NA	NA	NA
Layer 26	Slime	5594.95	5594.87	5594.79	0.15	11.36	NA	NA	NA	NA	NA	NA	NA	NA
Layer 27	Sand-Slime	5594.79	5592.42	5590.04	4.75	11.20	NA	NA	NA	NA	NA	NA	NA	NA
Layer 28	Slime	5590.04	5589.96	5589.88	0.16	6.45	NA	NA	NA	NA	NA	NA	NA	NA
Layer 29	Sand-Slime	5589.88	5588.45	5587.03	2.85	6.29	4212.55	4297.55	0.99	0.92	0.005	0.020	0.90	0.029
Layer 30	Sand	5587.03	5586.79	5586.55	0.48	3.44	4312.52	4327.48	0.74	0.70	0.002	0.010	0.69	0.003
Layer 31	Sand-Slime	5586.55	5585.07	5583.59	2.96	2.96	4414.03	4500.59	0.99	0.92	0.005	0.020	0.90	0.030
													TOTAL:	0.06

Notes:

¹ From on-site investigation (Tailings Data Analysis Report. MWH, 2015)

2W7-C

FINAL COVER

5626.65	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
4.00	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
-0.95	Thickness of Random/Platform Fill on top of existing interim cover (ft)	Calculated
812.44	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5613.10	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report. MWH, 2015)
5611.5	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013).
5595.40	Water surface elevation at t_1 (ft amsl)	
5590.40	Water surface elevation at t_2 (ft amsl)	

2W7-C

CREEP SETTLEMENT

Soil Layer	Material Type ¹	Elevation at Top of Layer at t_1 , z_{1-top1} (ft amsl)	Elevation at Midpoint of Layer at t_1 , z_{1-mid1} (ft amsl)	Elevation at Bottom of Layer at t_1 , $z_{1-bott1}$ (ft amsl)	Thickness of Layer at t_1 , H (ft)	Height above liner (ft)	Effective Stress at Midpoint of Layer at t_1 , σ'_{1-mid1} (psf)	Effective Stress at Bottom of Layer at t_1 , $\sigma'_{1-bott1}$ (psf)	Void Ratio at t_1 , e_1	Void Ratio at t_1 , e_1	Secondary Compression Index, C_e	Change in Void Ratio due to 1000 years of Creep, Δe	Final Void Ratio After 1,000 years, e_{final}	Settlement due to 1000 years of Creep, δ_{creep} (ft)
Erosion Protection Layer	Erosion Protection Layer	5625.48	5625.23	5624.98	0.50	35.08	NA	NA	NA	NA	NA	NA	NA	NA
Rooting Zone	Rooting Zone	5624.98	5623.23	5621.48	3.50	34.58	NA	NA	NA	NA	NA	NA	NA	NA
High-Compaction Layer	High-Compaction Layer	5621.48	5619.48	5617.48	4.00	31.08	NA	NA	NA	NA	NA	NA	NA	NA
Platform Fill	Platform Fill	5617.48	5617.95	5618.43	-0.95	27.08	NA	NA	NA	NA	NA	NA	NA	NA
Layer 1	Int. Cover	5618.43	5616.97	5615.51	2.92	28.03	NA	NA	NA	NA	NA	NA	NA	NA
Layer 2	Sand-Slime	5615.51	5614.27	5613.03	2.48	25.11	NA	NA	NA	NA	NA	NA	NA	NA
Layer 3	Slime	5613.03	5612.94	5612.86	0.16	22.63	NA	NA	NA	NA	NA	NA	NA	NA
Layer 4	Sand-Slime	5612.86	5612.00	5611.13	1.73	22.46	NA	NA	NA	NA	NA	NA	NA	NA
Layer 5	Slime	5611.13	5611.05	5610.97	0.16	20.73	NA	NA	NA	NA	NA	NA	NA	NA
Layer 6	Sand-Slime	5610.97	5610.26	5609.55	1.42	20.57	NA	NA	NA	NA	NA	NA	NA	NA
Layer 7	Slime	5609.55	5609.47	5609.38	0.16	19.15	NA	NA	NA	NA	NA	NA	NA	NA
Layer 8	Sand-Slime	5609.38	5609.31	5609.23	0.15	18.98	NA	NA	NA	NA	NA	NA	NA	NA
Layer 9	Slime	5609.23	5609.15	5609.07	0.16	18.83	NA	NA	NA	NA	NA	NA	NA	NA
Layer 10	Sand-Slime	5609.07	5605.59	5602.11	6.96	18.67	NA	NA	NA	NA	NA	NA	NA	NA
Layer 11	Slime	5602.11	5601.79	5601.47	0.64	11.71	NA	NA	NA	NA	NA	NA	NA	NA
Layer 12	Sand-Slime	5601.47	5601.39	5601.32	0.15	11.07	NA	NA	NA	NA	NA	NA	NA	NA
Layer 13	Slime	5601.32	5601.16	5601.00	0.32	10.92	NA	NA	NA	NA	NA	NA	NA	NA
Layer 14	Sand-Slime	5601.00	5600.37	5599.74	1.26	10.60	NA	NA	NA	NA	NA	NA	NA	NA
Layer 15	Slime	5599.74	5599.65	5599.57	0.16	9.34	NA	NA	NA	NA	NA	NA	NA	NA
Layer 16	Sand	5599.57	5599.49	5599.42	0.16	9.17	NA	NA	NA	NA	NA	NA	NA	NA
Layer 17	Sand-Slime	5599.42	5599.33	5599.25	0.16	9.02	NA	NA	NA	NA	NA	NA	NA	NA
Layer 18	Slime	5599.25	5598.94	5598.63	0.63	8.85	NA	NA	NA	NA	NA	NA	NA	NA
Layer 19	Sand-Slime	5598.63	5598.23	5597.84	0.79	8.23	NA	NA	NA	NA	NA	NA	NA	NA
Layer 20	Slime	5597.84	5597.36	5596.88	0.95	7.44	NA	NA	NA	NA	NA	NA	NA	NA
Layer 21	Sand-Slime	5596.88	5596.73	5596.57	0.31	6.48	NA	NA	NA	NA	NA	NA	NA	NA
Layer 22	Slime	5596.57	5596.49	5596.41	0.16	6.17	NA	NA	NA	NA	NA	NA	NA	NA
Layer 23	Sand-Slime	5596.41	5596.17	5595.94	0.47	6.01	NA	NA	NA	NA	NA	NA	NA	NA
Layer 24	Slime	5595.94	5595.86	5595.78	0.15	5.54	NA	NA	NA	NA	NA	NA	NA	NA
Layer 25	Sand-Slime	5595.78	5595.39	5594.99	0.79	5.38	3592.85	3626.66	0.99	0.91	0.005	0.020	0.89	0.008
Layer 26	Slime	5594.99	5594.68	5594.36	0.64	4.59	3643.40	3660.14	1.29	1.20	0.006	0.023	1.18	0.007
Layer 27	Sand-Slime	5594.36	5594.28	5594.20	0.15	3.96	3664.66	3669.19	0.99	0.91	0.005	0.020	0.89	0.002
Layer 28	Slime	5594.20	5593.96	5593.72	0.48	3.80	3681.87	3694.55	1.29	1.21	0.006	0.023	1.18	0.005
Layer 29	Sand-Slime	5593.72	5593.49	5593.25	0.47	3.32	3708.41	3722.27	0.99	0.92	0.005	0.020	0.90	0.005
Layer 30	Slime	5593.25	5593.17	5593.09	0.15	2.85	3726.33	3730.39	1.29	1.21	0.006	0.023	1.18	0.002
Layer 31	Sand-Slime	5593.09	5592.54	5591.98	1.11	2.69	3762.92	3795.44	0.99	0.92	0.005	0.020	0.90	0.011
Layer 32	Slime	5591.98	5591.75	5591.51	0.47	1.58	3807.87	3820.30	1.29	1.21	0.006	0.023	1.19	0.005
Layer 33	Sand-Slime	5591.51	5590.96	5590.40	1.11	1.11	3852.83	3885.36	0.99	0.92	0.005	0.020	0.90	0.011
													TOTAL:	0.06

Notes:

¹ From on-site investigation (Tailings Data Analysis Report. MWH, 2015)

2E1

FINAL COVER

5630.46	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
4.00	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
2.51	Thickness of Random/Platform Fill on top of existing interim cover (ft)	Calculated
1160.95	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5610.80	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report. MWH, 2015)
5610.8	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013).
5595.46	Water surface elevation at t_1 (ft amsl)	
5590.46	Water surface elevation at t_2 (ft amsl)	

2E1

CREEP SETTLEMENT

Soil Layer	Material Type ¹	Elevation at Top of Layer at t_0 , z_{i-top1} (ft amsl)	Elevation at Midpoint of Layer at t_1 , z_{i-mid1} (ft amsl)	Elevation at Bottom of Layer at t_1 , $z_{i-bott1}$ (ft amsl)	Thickness of Layer at t_1 , H (ft)	Height above liner (ft)	Effective Stress at Midpoint of Layer at t_1 , σ'_{i-mid1} (psf)	Effective Stress at Bottom of Layer at t_1 , $\sigma'_{i-bott1}$ (psf)	Void Ratio at t_0 , e_0	Void Ratio at t_1 , e_1	Secondary Compression Index, C_e	Change in Void Ratio due to 1000 years of Creep, Δe	Final Void Ratio After 1,000 years, e_{final}	Settlement due to 1000 years of Creep, δ_{creep} (ft)
Erosion Protection Layer	Erosion Protection Layer	5629.16	5628.91	5628.66	0.50	38.70	NA	NA	NA	NA	NA	NA	NA	NA
Rooting Zone	Rooting Zone	5628.66	5626.91	5625.16	3.50	38.20	NA	NA	NA	NA	NA	NA	NA	NA
High-Compaction Layer	High-Compaction Layer	5625.16	5623.16	5621.16	4.00	34.70	NA	NA	NA	NA	NA	NA	NA	NA
Platform Fill	Platform Fill	5621.16	5619.91	5618.65	2.51	30.70	NA	NA	NA	NA	NA	NA	NA	NA
Layer 1	Int. Cover	5618.65	5617.21	5615.76	2.89	28.19	NA	NA	NA	NA	NA	NA	NA	NA
Layer 2	Sand	5615.76	5615.45	5615.13	0.63	25.30	NA	NA	NA	NA	NA	NA	NA	NA
Layer 3	Sand-Slime	5615.13	5614.91	5614.68	0.46	24.67	NA	NA	NA	NA	NA	NA	NA	NA
Layer 4	Slime	5614.68	5614.52	5614.37	0.31	24.22	NA	NA	NA	NA	NA	NA	NA	NA
Layer 5	Sand-Slime	5614.37	5614.21	5614.06	0.31	23.91	NA	NA	NA	NA	NA	NA	NA	NA
Layer 6	Sand	5614.06	5613.66	5613.27	0.79	23.60	NA	NA	NA	NA	NA	NA	NA	NA
Layer 7	Sand-Slime	5613.27	5612.88	5612.49	0.78	22.81	NA	NA	NA	NA	NA	NA	NA	NA
Layer 8	Sand	5612.49	5612.33	5612.18	0.31	22.03	NA	NA	NA	NA	NA	NA	NA	NA
Layer 9	Sand-Slime	5612.18	5609.66	5607.14	5.04	21.72	NA	NA	NA	NA	NA	NA	NA	NA
Layer 10	Slime	5607.14	5607.05	5606.97	0.16	16.68	NA	NA	NA	NA	NA	NA	NA	NA
Layer 11	Sand-Slime	5606.97	5606.90	5606.82	0.15	16.51	NA	NA	NA	NA	NA	NA	NA	NA
Layer 12	Slime	5606.82	5606.74	5606.66	0.16	16.36	NA	NA	NA	NA	NA	NA	NA	NA
Layer 13	Sand-Slime	5606.66	5605.95	5605.24	1.41	16.20	NA	NA	NA	NA	NA	NA	NA	NA
Layer 14	Slime	5605.24	5605.16	5605.08	0.16	14.78	NA	NA	NA	NA	NA	NA	NA	NA
Layer 15	Sand-Slime	5605.08	5604.93	5604.77	0.31	14.62	NA	NA	NA	NA	NA	NA	NA	NA
Layer 16	Slime	5604.77	5604.69	5604.61	0.16	14.31	NA	NA	NA	NA	NA	NA	NA	NA
Layer 17	Sand-Slime	5604.61	5601.06	5597.52	7.09	14.15	NA	NA	NA	NA	NA	NA	NA	NA
Layer 18	Slime	5597.52	5597.36	5597.20	0.32	7.06	NA	NA	NA	NA	NA	NA	NA	NA
Layer 19	Sand-Slime	5597.20	5595.63	5594.05	3.15	6.74	3973.89	4089.75	0.99	0.91	0.005	0.020	0.89	0.032
Layer 20	Slime	5594.05	5593.89	5593.73	0.32	3.59	4098.12	4106.49	1.29	1.20	0.006	0.023	1.18	0.003
Layer 21	Sand-Slime	5593.73	5593.58	5593.43	0.31	3.27	4115.54	4124.60	0.99	0.91	0.005	0.020	0.89	0.003
Layer 22	Slime	5593.43	5593.27	5593.11	0.32	2.97	4132.97	4141.34	1.29	1.20	0.006	0.023	1.18	0.003
Layer 23	Sand-Slime	5593.11	5592.47	5591.84	1.27	2.65	4178.67	4216.01	0.99	0.91	0.005	0.020	0.89	0.013
Layer 24	Sand-Slime	5591.84	5591.15	5590.46	1.38	1.38	4256.46	4296.91	0.99	0.91	0.005	0.020	0.89	0.014
													TOTAL:	0.07

Notes:

¹ From on-site investigation (Tailings Data Analysis Report. MWH, 2015)

3-1S

FINAL COVER

5620.47	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
0.41	Thickness of Random/Platform Fill on top of existing interim cover (ft)	Calculated
887.10	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5608.00	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report. MWH, 2015)
5604.4	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013).
5595.59	Water surface elevation at t_1 (ft amsl)	
5590.59	Water surface elevation at t_2 (ft amsl)	

3-1S

CREEP SETTLEMENT

Soil Layer	Material Type ¹	Elevation at Top of Layer at t_1 , z_{i-top1} (ft amsl)	Elevation at Midpoint of Layer at t_1 , z_{i-mid1} (ft amsl)	Elevation at Bottom of Layer at t_1 , $z_{i-bott1}$ (ft amsl)	Thickness of Layer at t_1 , H (ft)	Height above liner (ft)	Effective Stress at Midpoint of Layer at t_1 , σ'_{i-mid1} (psf)	Effective Stress at Bottom of Layer at t_1 , $\sigma'_{i-bott1}$ (psf)	Void Ratio at t_0 , e_0	Void Ratio at t_1 , e_1	Secondary Compression Index, C_α	Change in Void Ratio due to 1000 years of Creep, Δe	Final Void Ratio After 1,000 years, e_{final}	Settlement due to 1000 years of Creep, δ_{creep} (ft)
Erosion Protection Layer	Erosion Protection Layer	5619.59	5619.34	5619.09	0.50	29.00	NA	NA	NA	NA	NA	NA	NA	NA
Rooting Zone	Rooting Zone	5619.09	5617.34	5615.59	3.50	28.50	NA	NA	NA	NA	NA	NA	NA	NA
High-Compaction Layer	High-Compaction Layer	5615.59	5613.84	5612.09	3.50	25.00	NA	NA	NA	NA	NA	NA	NA	NA
Platform Fill	Platform Fill	5612.09	5611.89	5611.68	0.41	21.50	NA	NA	NA	NA	NA	NA	NA	NA
Layer 1	Int. Cover	5611.68	5610.23	5608.77	2.91	21.09	NA	NA	NA	NA	NA	NA	NA	NA
Layer 2	Slime	5608.77	5608.08	5607.39	1.38	18.18	NA	NA	NA	NA	NA	NA	NA	NA
Layer 3	Sand-Slime	5607.39	5607.31	5607.23	0.16	16.80	NA	NA	NA	NA	NA	NA	NA	NA
Layer 4	Sand	5607.23	5605.95	5604.68	2.55	16.64	NA	NA	NA	NA	NA	NA	NA	NA
Layer 5	Sand-Slime	5604.68	5604.44	5604.20	0.48	14.09	NA	NA	NA	NA	NA	NA	NA	NA
Layer 6	Sand	5604.20	5603.96	5603.72	0.48	13.61	NA	NA	NA	NA	NA	NA	NA	NA
Layer 7	Sand-Slime	5603.72	5603.32	5602.93	0.79	13.13	NA	NA	NA	NA	NA	NA	NA	NA
Layer 8	Sand	5602.93	5602.69	5602.45	0.48	12.34	NA	NA	NA	NA	NA	NA	NA	NA
Layer 9	Sand-Slime	5602.45	5602.29	5602.13	0.32	11.86	NA	NA	NA	NA	NA	NA	NA	NA
Layer 10	Slime	5602.13	5602.05	5601.97	0.15	11.54	NA	NA	NA	NA	NA	NA	NA	NA
Layer 11	Sand-Slime	5601.97	5600.86	5599.76	2.22	11.38	NA	NA	NA	NA	NA	NA	NA	NA
Layer 12	Sand	5599.76	5599.68	5599.60	0.16	9.17	NA	NA	NA	NA	NA	NA	NA	NA
Layer 13	Sand-Slime	5599.60	5597.70	5595.80	3.80	9.01	NA	NA	NA	NA	NA	NA	NA	NA
Layer 14	Slime	5595.80	5595.73	5595.65	0.15	5.21	NA	NA	NA	NA	NA	NA	NA	NA
Layer 15	Sand-Slime	5595.65	5595.10	5594.54	1.11	5.06	2874.54	2907.07	0.99	0.91	0.005	0.020	0.89	0.011
Layer 16	Sand-Slime	5594.54	5592.57	5590.59	3.95	3.95	3022.76	3138.45	0.99	0.92	0.005	0.020	0.90	0.040
													TOTAL:	0.05

Notes:

¹ From on-site investigation (Tailings Data Analysis Report. MWH, 2015)

3-2C

FINAL COVER

5621.51	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.19	Thickness of Random/Platform Fill on top of existing interim cover (ft)	Calculated
1167.12	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5605.30	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report. MWH, 2015)
5602.7	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013).
5591.64	Water surface elevation at t_1 (ft amsl)	
5586.64	Water surface elevation at t_2 (ft amsl)	

3-2C

CREEP SETTLEMENT

Soil Layer	Material Type ¹	Elevation at Top of Layer at t_1 , z_{i-top1} (ft amsl)	Elevation at Midpoint of Layer at t_1 , z_{i-mid1} (ft amsl)	Elevation at Bottom of Layer at t_1 , $z_{i-bott1}$ (ft amsl)	Thickness of Layer at t_1 , H (ft)	Height above liner (ft)	Effective Stress at Midpoint of Layer at t_1 , σ'_{i-mid1} (psf)	Effective Stress at Bottom of Layer at t_1 , $\sigma'_{i-bott1}$ (psf)	Void Ratio at t_0 , e_0	Void Ratio at t_1 , e_1	Secondary Compression Index, C_e	Change in Void Ratio due to 1000 years of Creep, Δe	Final Void Ratio After 1,000 years, e_{final}	Settlement due to 1000 years of Creep, δ_{creep} (ft)
Erosion Protection Layer	Erosion Protection Layer	5620.32	5620.07	5619.82	0.50	33.68	NA	NA	NA	NA	NA	NA	NA	NA
Rooting Zone	Rooting Zone	5619.82	5618.07	5616.32	3.50	33.18	NA	NA	NA	NA	NA	NA	NA	NA
High-Compaction Layer	High-Compaction Layer	5616.32	5614.57	5612.82	3.50	29.68	NA	NA	NA	NA	NA	NA	NA	NA
Platform Fill	Platform Fill	5612.82	5611.23	5609.63	3.19	26.18	NA	NA	NA	NA	NA	NA	NA	NA
Layer 1	Int. Cover	5609.63	5608.19	5606.76	2.88	22.99	NA	NA	NA	NA	NA	NA	NA	NA
Layer 2	Sand	5606.76	5606.67	5606.59	0.16	20.12	NA	NA	NA	NA	NA	NA	NA	NA
Layer 3	Sand-Slime	5606.59	5606.52	5606.45	0.15	19.95	NA	NA	NA	NA	NA	NA	NA	NA
Layer 4	Slime	5606.45	5605.99	5605.53	0.92	19.81	NA	NA	NA	NA	NA	NA	NA	NA
Layer 5	Sand-Slime	5605.53	5605.14	5604.76	0.77	18.89	NA	NA	NA	NA	NA	NA	NA	NA
Layer 6	Slime	5604.76	5604.60	5604.45	0.31	18.12	NA	NA	NA	NA	NA	NA	NA	NA
Layer 7	Sand-Slime	5604.45	5604.30	5604.15	0.30	17.81	NA	NA	NA	NA	NA	NA	NA	NA
Layer 8	Slime	5604.15	5603.83	5603.52	0.62	17.51	NA	NA	NA	NA	NA	NA	NA	NA
Layer 9	Sand-Slime	5603.52	5600.22	5596.93	6.59	16.88	NA	NA	NA	NA	NA	NA	NA	NA
Layer 10	Slime	5596.93	5596.85	5596.78	0.15	10.29	NA	NA	NA	NA	NA	NA	NA	NA
Layer 11	Sand-Slime	5596.78	5596.54	5596.30	0.48	10.14	NA	NA	NA	NA	NA	NA	NA	NA
Layer 12	Slime	5596.30	5595.83	5595.36	0.94	9.66	NA	NA	NA	NA	NA	NA	NA	NA
Layer 13	Sand-Slime	5595.36	5594.65	5593.94	1.42	8.72	NA	NA	NA	NA	NA	NA	NA	NA
Layer 14	Slime	5593.94	5593.86	5593.79	0.15	7.30	NA	NA	NA	NA	NA	NA	NA	NA
Layer 15	Sand-Slime	5593.79	5593.24	5592.69	1.10	7.15	NA	NA	NA	NA	NA	NA	NA	NA
Layer 16	Slime	5592.69	5592.53	5592.37	0.32	6.05	NA	NA	NA	NA	NA	NA	NA	NA
Layer 17	Sand-Slime	5592.37	5591.98	5591.59	0.79	5.73	NA	NA	NA	NA	NA	NA	NA	NA
Layer 18	Slime	5591.59	5591.43	5591.27	0.32	4.95	3371.80	3380.17	1.29	1.19	0.006	0.023	1.17	0.003
Layer 19	Sand-Slime	5591.27	5591.03	5590.80	0.47	4.63	3394.03	3407.89	0.99	0.90	0.005	0.020	0.88	0.005
Layer 20	Slime	5590.80	5590.72	5590.65	0.15	4.16	3411.95	3416.00	1.29	1.19	0.006	0.023	1.17	0.002
Layer 21	Sand-Slime	5590.65	5590.49	5590.33	0.32	4.01	3425.34	3434.67	0.99	0.90	0.005	0.020	0.88	0.003
Layer 22	Sand-Slime	5590.33	5588.49	5586.64	3.69	3.69	3543.29	3651.91	0.99	0.91	0.005	0.020	0.89	0.038
													TOTAL:	0.05

Notes:

¹ From on-site investigation (Tailings Data Analysis Report. MWH, 2015)

3-3S

FINAL COVER

5620.49	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.36	Thickness of Random/Platform Fill on top of existing interim cover (ft)	Calculated
1184.24	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5605.60	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report. MWH, 2015)
5601.5	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013).
5582.14	Water surface elevation at t_1 (ft amsl)	
5577.14	Water surface elevation at t_2 (ft amsl)	

3-3S

CREEP SETTLEMENT

Soil Layer	Material Type ¹	Elevation at Top of Layer at t_1 , z_{i-top1} (ft amsl)	Elevation at Midpoint of Layer at t_1 , z_{i-mid1} (ft amsl)	Elevation at Bottom of Layer at t_1 , $z_{i-bott1}$ (ft amsl)	Thickness of Layer at t_1 , H (ft)	Height above liner (ft)	Effective Stress at Midpoint of Layer at t_1 , σ'_{i-mid1} (psf)	Effective Stress at Bottom of Layer at t_1 , $\sigma'_{i-bott1}$ (psf)	Void Ratio at t_1 , e_1	Void Ratio at t_1 , e_1	Secondary Compression Index, C_e	Change in Void Ratio due to 1000 years of Creep, Δe	Final Void Ratio After 1,000 years, e_{final}	Settlement due to 1000 years of Creep, δ_{creep} (ft)
Erosion Protection Layer	Erosion Protection Layer	5619.02	5618.77	5618.52	0.50	41.88	NA	NA	NA	NA	NA	NA	NA	NA
Rooting Zone	Rooting Zone	5618.52	5616.77	5615.02	3.50	41.38	NA	NA	NA	NA	NA	NA	NA	NA
High-Compaction Layer	High-Compaction Layer	5615.02	5613.27	5611.52	3.50	37.88	NA	NA	NA	NA	NA	NA	NA	NA
Platform Fill	Platform Fill	5611.52	5609.84	5608.16	3.36	34.38	NA	NA	NA	NA	NA	NA	NA	NA
Layer 1	Int. Cover	5608.16	5606.72	5605.29	2.88	31.02	NA	NA	NA	NA	NA	NA	NA	NA
Layer 2	Sand	5605.29	5604.89	5604.50	0.78	28.15	NA	NA	NA	NA	NA	NA	NA	NA
Layer 3	Sand-Slime	5604.50	5604.27	5604.04	0.47	27.36	NA	NA	NA	NA	NA	NA	NA	NA
Layer 4	Sand	5604.04	5603.33	5602.62	1.42	26.90	NA	NA	NA	NA	NA	NA	NA	NA
Layer 5	Sand-Slime	5602.62	5601.44	5600.27	2.34	25.48	NA	NA	NA	NA	NA	NA	NA	NA
Layer 6	Slime	5600.27	5600.12	5599.96	0.32	23.13	NA	NA	NA	NA	NA	NA	NA	NA
Layer 7	Sand-Slime	5599.96	5599.88	5599.80	0.15	22.82	NA	NA	NA	NA	NA	NA	NA	NA
Layer 8	Slime	5599.80	5599.65	5599.49	0.32	22.66	NA	NA	NA	NA	NA	NA	NA	NA
Layer 9	Sand-Slime	5599.49	5598.62	5597.76	1.73	22.35	NA	NA	NA	NA	NA	NA	NA	NA
Layer 10	Slime	5597.76	5597.36	5596.97	0.78	20.62	NA	NA	NA	NA	NA	NA	NA	NA
Layer 11	Sand-Slime	5596.97	5596.74	5596.50	0.47	19.83	NA	NA	NA	NA	NA	NA	NA	NA
Layer 12	Slime	5596.50	5596.43	5596.35	0.15	19.36	NA	NA	NA	NA	NA	NA	NA	NA
Layer 13	Sand-Slime	5596.35	5595.57	5594.78	1.57	19.21	NA	NA	NA	NA	NA	NA	NA	NA
Layer 14	Slime	5594.78	5594.70	5594.62	0.16	17.64	NA	NA	NA	NA	NA	NA	NA	NA
Layer 15	Sand-Slime	5594.62	5594.46	5594.30	0.32	17.48	NA	NA	NA	NA	NA	NA	NA	NA
Layer 16	Slime	5594.30	5593.99	5593.68	0.62	17.16	NA	NA	NA	NA	NA	NA	NA	NA
Layer 17	Sand-Slime	5593.68	5593.21	5592.73	0.95	16.54	NA	NA	NA	NA	NA	NA	NA	NA
Layer 18	Slime	5592.73	5592.42	5592.11	0.62	15.59	NA	NA	NA	NA	NA	NA	NA	NA
Layer 19	Sand-Slime	5592.11	5591.56	5591.01	1.10	14.97	NA	NA	NA	NA	NA	NA	NA	NA
Layer 20	Slime	5591.01	5590.93	5590.86	0.15	13.87	NA	NA	NA	NA	NA	NA	NA	NA
Layer 21	Sand-Slime	5590.86	5590.38	5589.91	0.95	13.72	NA	NA	NA	NA	NA	NA	NA	NA
Layer 22	Slime	5589.91	5589.83	5589.75	0.15	12.77	NA	NA	NA	NA	NA	NA	NA	NA
Layer 23	Sand-Slime	5589.75	5589.20	5588.65	1.10	12.61	NA	NA	NA	NA	NA	NA	NA	NA
Layer 24	Sand	5588.65	5588.49	5588.33	0.32	11.51	NA	NA	NA	NA	NA	NA	NA	NA
Layer 25	Sand-Slime	5588.33	5587.15	5585.97	2.36	11.19	NA	NA	NA	NA	NA	NA	NA	NA
Layer 26	Sand	5585.97	5585.73	5585.49	0.48	8.83	NA	NA	NA	NA	NA	NA	NA	NA
Layer 27	Sand-Slime	5585.49	5581.32	5577.14	8.35	8.35	4428.47	4674.84	0.99	0.90	0.005	0.020	0.88	0.086
													TOTAL:	0.09

Notes:

¹ From on-site investigation (Tailings Data Analysis Report. MWH, 2015)

3-4N

FINAL COVER

5623.36	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
7.16	Thickness of Random/Platform Fill on top of existing interim cover (ft)	Calculated
1567.00	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5606.00	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report. MWH, 2015)
5600.6	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013).
5583.71	Water surface elevation at t_1 (ft amsl)	
5578.71	Water surface elevation at t_2 (ft amsl)	

3-4N

CREEP SETTLEMENT

Soil Layer	Material Type ¹	Elevation at Top of Layer at t_1 , z_{i-top1} (ft amsl)	Elevation at Midpoint of Layer at t_1 , z_{i-mid1} (ft amsl)	Elevation at Bottom of Layer at t_1 , $z_{i-bott1}$ (ft amsl)	Thickness of Layer at t_1 , H (ft)	Height above liner (ft)	Effective Stress at Midpoint of Layer at t_1 , σ'_{i-mid1} (psf)	Effective Stress at Bottom of Layer at t_1 , $\sigma'_{i-bott1}$ (psf)	Void Ratio at t_0 , e_0	Void Ratio at t_1 , e_1	Secondary Compression Index, C_α	Change in Void Ratio due to 1000 years of Creep, Δe	Final Void Ratio After 1,000 years, e_{final}	Settlement due to 1000 years of Creep, δ_{creep} (ft)
Erosion Protection Layer	Erosion Protection Layer	5621.80	5621.55	5621.30	0.50	43.09	NA	NA	NA	NA	NA	NA	NA	NA
Rooting Zone	Rooting Zone	5621.30	5619.55	5617.80	3.50	42.59	NA	NA	NA	NA	NA	NA	NA	NA
High-Compaction Layer	High-Compaction Layer	5617.80	5616.05	5614.30	3.50	39.09	NA	NA	NA	NA	NA	NA	NA	NA
Platform Fill	Platform Fill	5614.30	5610.72	5607.14	7.16	35.59	NA	NA	NA	NA	NA	NA	NA	NA
Layer 1	Int. Cover	5607.14	5605.71	5604.29	2.86	28.43	NA	NA	NA	NA	NA	NA	NA	NA
Layer 2	Sand	5604.29	5603.35	5602.41	1.88	25.58	NA	NA	NA	NA	NA	NA	NA	NA
Layer 3	Sand-Slime	5602.41	5600.24	5598.07	4.33	23.70	NA	NA	NA	NA	NA	NA	NA	NA
Layer 4	Slime	5598.07	5597.29	5596.52	1.56	19.36	NA	NA	NA	NA	NA	NA	NA	NA
Layer 5	Sand-Slime	5596.52	5596.36	5596.20	0.31	17.81	NA	NA	NA	NA	NA	NA	NA	NA
Layer 6	Sand	5596.20	5595.88	5595.56	0.64	17.49	NA	NA	NA	NA	NA	NA	NA	NA
Layer 7	Slime	5595.56	5595.49	5595.41	0.15	16.85	NA	NA	NA	NA	NA	NA	NA	NA
Layer 8	Sand-Slime	5595.41	5595.25	5595.10	0.31	16.70	NA	NA	NA	NA	NA	NA	NA	NA
Layer 9	Sand	5595.10	5595.02	5594.94	0.16	16.39	NA	NA	NA	NA	NA	NA	NA	NA
Layer 10	Slime	5594.94	5594.86	5594.78	0.16	16.23	NA	NA	NA	NA	NA	NA	NA	NA
Layer 11	Sand-Slime	5594.78	5594.70	5594.63	0.15	16.07	NA	NA	NA	NA	NA	NA	NA	NA
Layer 12	Slime	5594.63	5594.24	5593.85	0.78	15.92	NA	NA	NA	NA	NA	NA	NA	NA
Layer 13	Sand-Slime	5593.85	5593.69	5593.53	0.31	15.14	NA	NA	NA	NA	NA	NA	NA	NA
Layer 14	Slime	5593.53	5593.38	5593.22	0.31	14.82	NA	NA	NA	NA	NA	NA	NA	NA
Layer 15	Sand-Slime	5593.22	5590.18	5587.14	6.08	14.51	NA	NA	NA	NA	NA	NA	NA	NA
Layer 16	Sand-Slime	5587.14	5582.92	5578.71	8.43	8.43	4510.59	4760.35	0.99	0.89	0.005	0.020	0.88	0.087
													TOTAL:	0.09

Notes:

¹ From on-site investigation (Tailings Data Analysis Report. MWH, 2015)

3-6N

FINAL COVER

5623.62	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
8.68	Thickness of Random/Platform Fill on top of existing interim cover (ft)	Calculated
1720.10	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5604.20	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report. MWH, 2015)
5599.3	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013).
5590.44	Water surface elevation at t_1 (ft amsl)	
5585.44	Water surface elevation at t_2 (ft amsl)	

3-6N

CREEP SETTLEMENT

Soil Layer	Material Type ¹	Elevation at Top of Layer at t_1 , z_{i-top1} (ft amsl)	Elevation at Midpoint of Layer at t_1 , z_{i-mid1} (ft amsl)	Elevation at Bottom of Layer at t_1 , $z_{i-bott1}$ (ft amsl)	Thickness of Layer at t_1 , H (ft)	Height above liner (ft)	Effective Stress at Midpoint of Layer at t_1 , σ'_{i-mid1} (psf)	Effective Stress at Bottom of Layer at t_1 , $\sigma'_{i-bott1}$ (psf)	Void Ratio at t_0 , e_0	Void Ratio at t_1 , e_1	Secondary Compression Index, C_α	Change in Void Ratio due to 1000 years of Creep, Δe	Final Void Ratio After 1,000 years, e_{final}	Settlement due to 1000 years of Creep, δ_{creep} (ft)
Erosion Protection Layer	Erosion Protection Layer	5622.28	5622.03	5621.78	0.50	36.84	NA	NA	NA	NA	NA	NA	NA	NA
Rooting Zone	Rooting Zone	5621.78	5620.03	5618.28	3.50	36.34	NA	NA	NA	NA	NA	NA	NA	NA
High-Compaction Layer	High-Compaction Layer	5618.28	5616.53	5614.78	3.50	32.84	NA	NA	NA	NA	NA	NA	NA	NA
Platform Fill	Platform Fill	5614.78	5610.44	5606.10	8.68	29.34	NA	NA	NA	NA	NA	NA	NA	NA
Layer 1	Int. Cover	5606.10	5604.67	5603.25	2.85	20.66	NA	NA	NA	NA	NA	NA	NA	NA
Layer 2	Sand-Slime	5603.25	5603.18	5603.11	0.14	17.81	NA	NA	NA	NA	NA	NA	NA	NA
Layer 3	Sand	5603.11	5602.95	5602.79	0.31	17.67	NA	NA	NA	NA	NA	NA	NA	NA
Layer 4	Sand-Slime	5602.79	5602.64	5602.49	0.30	17.35	NA	NA	NA	NA	NA	NA	NA	NA
Layer 5	Slime	5602.49	5602.19	5601.90	0.60	17.05	NA	NA	NA	NA	NA	NA	NA	NA
Layer 6	Sand-Slime	5601.90	5601.52	5601.14	0.76	16.46	NA	NA	NA	NA	NA	NA	NA	NA
Layer 7	Slime	5601.14	5600.91	5600.67	0.46	15.70	NA	NA	NA	NA	NA	NA	NA	NA
Layer 8	Sand-Slime	5600.67	5600.45	5600.22	0.46	15.23	NA	NA	NA	NA	NA	NA	NA	NA
Layer 9	Sand	5600.22	5600.14	5600.06	0.15	14.78	NA	NA	NA	NA	NA	NA	NA	NA
Layer 10	Sand-Slime	5600.06	5599.91	5599.75	0.31	14.62	NA	NA	NA	NA	NA	NA	NA	NA
Layer 11	Slime	5599.75	5599.60	5599.44	0.31	14.31	NA	NA	NA	NA	NA	NA	NA	NA
Layer 12	Sand-Slime	5599.44	5599.29	5599.13	0.31	14.00	NA	NA	NA	NA	NA	NA	NA	NA
Layer 13	Slime	5599.13	5598.75	5598.36	0.77	13.69	NA	NA	NA	NA	NA	NA	NA	NA
Layer 14	Sand-Slime	5598.36	5598.20	5598.05	0.31	12.92	NA	NA	NA	NA	NA	NA	NA	NA
Layer 15	Slime	5598.05	5597.43	5596.81	1.24	12.61	NA	NA	NA	NA	NA	NA	NA	NA
Layer 16	Sand-Slime	5596.81	5596.66	5596.50	0.31	11.37	NA	NA	NA	NA	NA	NA	NA	NA
Layer 17	Slime	5596.50	5594.02	5591.54	4.96	11.06	NA	NA	NA	NA	NA	NA	NA	NA
Layer 18	Sand-Slime	5591.54	5590.61	5589.67	1.87	6.10	3584.42	3667.28	0.99	0.88	0.005	0.020	0.86	0.019
Layer 19	Slime	5589.67	5589.21	5588.74	0.94	4.23	3692.39	3717.50	1.29	1.17	0.006	0.023	1.15	0.010
Layer 20	Sand-Slime	5588.74	5587.09	5585.44	3.30	3.30	3815.37	3913.24	0.99	0.89	0.005	0.020	0.87	0.034
													TOTAL:	0.06

Notes:

¹ From on-site investigation (Tailings Data Analysis Report. MWH, 2015)

3-8N

FINAL COVER

5623.82	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
7.95	Thickness of Random/Platform Fill on top of existing interim cover (ft)	Calculated
1646.57	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5604.90	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report. MWH, 2015)
5600.3	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013).
5595.24	Water surface elevation at t_1 (ft amsl)	
5590.24	Water surface elevation at t_2 (ft amsl)	

3-8N

CREEP SETTLEMENT

Soil Layer	Material Type ¹	Elevation at Top of Layer at t_1 , z_{i-top1} (ft amsl)	Elevation at Midpoint of Layer at t_1 , z_{i-mid1} (ft amsl)	Elevation at Bottom of Layer at t_1 , $z_{i-bott1}$ (ft amsl)	Thickness of Layer at t_1 , H (ft)	Height above liner (ft)	Effective Stress at Midpoint of Layer at t_1 , σ'_{i-mid1} (psf)	Effective Stress at Bottom of Layer at t_1 , $\sigma'_{i-bott1}$ (psf)	Void Ratio at t_0 , e_0	Void Ratio at t_1 , e_1	Secondary Compression Index, C_e	Change in Void Ratio due to 1000 years of Creep, Δe	Final Void Ratio After 1,000 years, e_{final}	Settlement due to 1000 years of Creep, δ_{creep} (ft)
Erosion Protection Layer	Erosion Protection Layer	5622.79	5622.54	5622.29	0.50	32.55	NA	NA	NA	NA	NA	NA	NA	NA
Rooting Zone	Rooting Zone	5622.29	5620.54	5618.79	3.50	32.05	NA	NA	NA	NA	NA	NA	NA	NA
High-Compaction Layer	High-Compaction Layer	5618.79	5617.04	5615.29	3.50	28.55	NA	NA	NA	NA	NA	NA	NA	NA
Platform Fill	Platform Fill	5615.29	5611.31	5607.34	7.95	25.05	NA	NA	NA	NA	NA	NA	NA	NA
Layer 1	Int. Cover	5607.34	5605.91	5604.48	2.85	17.10	NA	NA	NA	NA	NA	NA	NA	NA
Layer 2	Slime	5604.48	5604.41	5604.34	0.14	14.24	NA	NA	NA	NA	NA	NA	NA	NA
Layer 3	Sand	5604.34	5604.26	5604.18	0.16	14.10	NA	NA	NA	NA	NA	NA	NA	NA
Layer 4	Sand-Slime	5604.18	5603.88	5603.58	0.59	13.94	NA	NA	NA	NA	NA	NA	NA	NA
Layer 5	Sand	5603.58	5603.43	5603.27	0.31	13.34	NA	NA	NA	NA	NA	NA	NA	NA
Layer 6	Sand-Slime	5603.27	5603.12	5602.97	0.30	13.03	NA	NA	NA	NA	NA	NA	NA	NA
Layer 7	Sand	5602.97	5601.94	5600.92	2.05	12.73	NA	NA	NA	NA	NA	NA	NA	NA
Layer 8	Sand-Slime	5600.92	5598.04	5595.17	5.75	10.68	NA	NA	NA	NA	NA	NA	NA	NA
Layer 9	Slime	5595.17	5595.09	5595.00	0.16	4.93	3152.03	3151.04	1.29	1.17	0.006	0.023	1.15	0.002
Layer 10	Sand-Slime	5595.00	5593.99	5592.98	2.03	4.76	3211.29	3271.54	0.99	0.89	0.005	0.020	0.87	0.021
Layer 11	Sand-Slime	5592.98	5591.61	5590.24	2.74	2.74	3352.72	3433.90	0.99	0.89	0.005	0.020	0.88	0.028
													TOTAL:	0.05

Notes:

¹ From on-site investigation (Tailings Data Analysis Report. MWH, 2015)

3-8S

FINAL COVER

5620.45	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	From cover design grading plan AutoCAD file
0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of Water Storage/Rooting Zone (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
3.50	Thickness of High Compaction Layer (ft)	From Appendix C - Radon Emanation Modeling (MWH, 2015)
4.25	Thickness of Random/Platform Fill on top of existing interim cover (ft)	Calculated
1273.89	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	Calculated

PROFILE INFORMATION

5603.50	Water surface elevation during CPT investigation (ft amsl)	From on-site investigation (Tailings Data Analysis Report. MWH, 2015)
5600.6	Water surface elevation at t_0 (ft amsl)	Minimum of 5' below top of tailings or water surface elevation at time of CPT testing (2013).
5590.63	Water surface elevation at t_1 (ft amsl)	
5585.63	Water surface elevation at t_2 (ft amsl)	

3-8S

CREEP SETTLEMENT

Soil Layer	Material Type ¹	Elevation at Top of Layer at t_1 , z_{i-top1} (ft amsl)	Elevation at Midpoint of Layer at t_1 , z_{i-mid1} (ft amsl)	Elevation at Bottom of Layer at t_1 , $z_{i-bott1}$ (ft amsl)	Thickness of Layer at t_1 , H (ft)	Height above liner (ft)	Effective Stress at Midpoint of Layer at t_1 , σ'_{i-mid1} (psf)	Effective Stress at Bottom of Layer at t_1 , $\sigma'_{i-bott1}$ (psf)	Void Ratio at t_0 , e_0	Void Ratio at t_1 , e_1	Secondary Compression Index, C_e	Change in Void Ratio due to 1000 years of Creep, Δe	Final Void Ratio After 1,000 years, e_{final}	Settlement due to 1000 years of Creep, δ_{creep} (ft)
Erosion Protection Layer	Erosion Protection Layer	5619.39	5619.14	5618.89	0.50	33.76	NA	NA	NA	NA	NA	NA	NA	NA
Rooting Zone	Rooting Zone	5618.89	5617.14	5615.39	3.50	33.26	NA	NA	NA	NA	NA	NA	NA	NA
High-Compaction Layer	High-Compaction Layer	5615.39	5613.64	5611.89	3.50	29.76	NA	NA	NA	NA	NA	NA	NA	NA
Platform Fill	Platform Fill	5611.89	5609.76	5607.64	4.25	26.26	NA	NA	NA	NA	NA	NA	NA	NA
Layer 1	Int. Cover	5607.64	5606.20	5604.77	2.87	22.01	NA	NA	NA	NA	NA	NA	NA	NA
Layer 2	Sand	5604.77	5604.22	5603.67	1.10	19.14	NA	NA	NA	NA	NA	NA	NA	NA
Layer 3	Sand-Slime	5603.67	5603.52	5603.36	0.31	18.04	NA	NA	NA	NA	NA	NA	NA	NA
Layer 4	Sand	5603.36	5603.29	5603.21	0.15	17.73	NA	NA	NA	NA	NA	NA	NA	NA
Layer 5	Sand-Slime	5603.21	5602.82	5602.44	0.77	17.58	NA	NA	NA	NA	NA	NA	NA	NA
Layer 6	Sand	5602.44	5600.69	5598.93	3.51	16.81	NA	NA	NA	NA	NA	NA	NA	NA
Layer 7	Sand-Slime	5598.93	5598.77	5598.62	0.32	13.30	NA	NA	NA	NA	NA	NA	NA	NA
Layer 8	Sand	5598.62	5598.45	5598.29	0.32	12.99	NA	NA	NA	NA	NA	NA	NA	NA
Layer 9	Sand-Slime	5598.29	5596.41	5594.53	3.77	12.66	NA	NA	NA	NA	NA	NA	NA	NA
Layer 10	Slime	5594.53	5594.45	5594.37	0.15	8.90	NA	NA	NA	NA	NA	NA	NA	NA
Layer 11	Sand-Slime	5594.37	5594.22	5594.06	0.32	8.74	NA	NA	NA	NA	NA	NA	NA	NA
Layer 12	Slime	5594.06	5593.75	5593.44	0.62	8.43	NA	NA	NA	NA	NA	NA	NA	NA
Layer 13	Sand-Slime	5593.44	5593.28	5593.12	0.32	7.81	NA	NA	NA	NA	NA	NA	NA	NA
Layer 14	Sand-Slime	5593.12	5589.38	5585.63	7.49	7.49	3447.52	3668.72	0.99	0.90	0.005	0.020	0.88	0.077
													TOTAL:	0.08

Notes:

¹ From on-site investigation (Tailings Data Analysis Report. MWH, 2015)

ATTACHMENT F.3

SEISMIC SETTLEMENT CALCULATIONS

Notes

t_0 corresponds to beginning of final cover placement
 t_1 corresponds to dewatering of the tailings to a level 5 feet above the liner
 t_2 corresponds to completion of dewatering

Assumes 99% of consolidation due to existing stress conditions has taken place

SOIL PROPERTIES		
TAILINGS		
Specific Gravity, G_s		
2.70	Specific gravity of tailing sands, $G_{s-TS\text{and}}$	Based on testing performed on other uranium tailings and presented in Keshian and Rager (1988)
2.80	Specific gravity of tailing sand-slimes, G_{s-TS-S}	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015b)
2.86	Specific gravity of tailing slimes, $G_{s-TS\text{lime}}$	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015b)
Fines Content		
18%	Fines content of tailings sands (%)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015b)
47%	Fines content of tailings sand-slimes (%)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015b)
71%	Fines content of tailings slimes (%)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015b)
Dry Unit Weight, γ_d		
97	In-situ dry unit weight of tailings sands at t_0 , $\gamma_{d0-TS\text{and}}$ (pcf)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015b)
88	In-situ dry unit weight of tailings sand-slimes at t_0 , $\gamma_{d0-TS-S}$ (pcf)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015b)
78	In-situ dry unit weight of tailings slimes at t_0 , $\gamma_{d0-TS\text{lime}}$ (pcf)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015b)
Saturated Unit Weight, γ_{sat}		
123	In-situ saturated unit weight of tailings sands at t_0 , $\gamma_{sat0-TS\text{and}}$ (pcf)	Calculated
119	In-situ saturated unit weight of tailings sand-slimes at t_0 , $\gamma_{sat0-TS-S}$ (pcf)	Calculated
113	In-situ saturated unit weight of tailings slimes at t_0 , $\gamma_{sat0-TS\text{lime}}$ (pcf)	Calculated
Moist Unit Weight, γ_m		
103	Moist unit weight of tailings sands, $\gamma_{m-TS\text{and}}$ (pcf)	Calculated, assuming long-term water content from laboratory testing (Tailings Data Analysis Report. MWH, 2015b)
93	Moist unit weight of tailings sand-slimes, γ_{m-TS-S} (pcf)	Calculated, assuming long-term water content from laboratory testing (Tailings Data Analysis Report. MWH, 2015b)
83	Moist unit weight of tailings slimes, $\gamma_{m-TS\text{lime}}$ (pcf)	Calculated, assuming long-term water content from laboratory testing (Tailings Data Analysis Report. MWH, 2015b)
Void Ratio, e		
0.74	Void ratio of tailing sands at t_0 , $e_{0-TS\text{and}}$	Calculated
0.99	Void ratio of tailing sand-slimes at t_0 , e_{0-TS-S}	Calculated
1.29	Void ratio of tailing slimes at t_0 , $e_{0-TS\text{lime}}$	Calculated
Saturated Water Content, w_{sat}		
27%	Saturated water content of tailings sands at t_0 , $w_{sat0-TS\text{and}}$ (%)	Calculated
35%	Saturated water content of tailings sand-slimes at t_0 , $w_{sat0-TS-S}$ (%)	Calculated
45%	Saturated water content of tailings slimes at t_0 , $w_{sat0-TS\text{lime}}$ (%)	Calculated
Water Content of Moist Tailings, w_{m-T}		
6%	Water content of moist tailings sands, $w_{m-TS\text{and}}$ (%)	From Attachment H - Radon Emanation Modeling including with this submittal
6%	Water content of moist tailings sand-slimes, w_{m-TS-S} (%)	From Attachment H - Radon Emanation Modeling including with this submittal
6%	Water content of moist tailings slimes, $w_{m-TS\text{lime}}$ (%)	From Attachment H - Radon Emanation Modeling including with this submittal
Plasticity Index, PI		
0	Plasticity index of tailings sands, $PI_{TS\text{and}}$	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015b)
10	Plasticity index of tailings sand-slimes, PI_{TS-S}	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015b)
16	Plasticity index of tailings slimes, $PI_{TS\text{lime}}$	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015b)
Seismic Settlement Coefficients		
2.2	Coefficient "a" of Unsaturated Sand Tailings	From Stewart, et al (2004), page 86, Figure 6.5
5.0	Coefficient "a" of Saturated Sand Tailings	From Stewart, et al (2004), page 86, Figure 6.5
2.0	Coefficient "a" of Sand-Slime Tailings	From Stewart, et al (2004), page 89, Figure 6.7
2.0	Coefficient "a" of Slime Tailings	From Stewart, et al (2004), page 89, Figure 6.7
1.00	Coefficient "b" of Sand Tailings	From Stewart, et al (2004), page 86, Figure 6.5
0.65	Coefficient "b" of Sand-Slime Tailings	From Stewart, et al (2004), page 89, Figure 6.7
0.65	Coefficient "b" of Slime Tailings	From Stewart, et al (2004), page 89, Figure 6.7
0.01%	Strain threshold value of Sand Tailings, γ_{tv}	From Stewart, et al (2004), page 86, Figure 6.5
0.03%	Strain threshold value of Sand-Slime Tailings, γ_{tv}	From Stewart, et al (2004), page 89, Figure 6.7
0.03%	Strain threshold value of Slime Tailings, γ_{tv}	From Stewart, et al (2004), page 89, Figure 6.7
0.36	Coefficient "R" of Sand Tailings	From Stewart, et al (2004), page 86, for soils with non-plastic fines
0.34	Coefficient "R" of Sand-Slime Tailings	From Stewart, et al (2004), page 89, for soils with medium plasticity fines
0.34	Coefficient "R" of Slime Tailings	From Stewart, et al (2004), page 89, for soils with medium plasticity fines

Other		
5.0	Height of water table above liner at t_1 , H_{wat-1} (ft)	Assumed for end of active maintenance
0.0	Height of water table above liner at t_2 , H_{wat-2} (ft)	
6.0%	Long-term moisture content of tailings, $w_{tailings}$ (%)	From Attachment H - Radon Emanation Modeling including with this submittal
508	Shear Wave Velocity of Tailings, V_s (ft/sec)	Conservatively assumed to be the average of the shear wave velocities measured in Cell 2 tailings

COVER SOIL

Specific Gravity, G_s		
2.61	Specific gravity of topsoil, $G_{s-topsoil}$	From Attachment H - Radon Emanation Modeling including with this submittal
2.62	Specific gravity of rock mulch, $G_{s-mulch}$	From Attachment H - Radon Emanation Modeling including with this submittal
2.63	Specific gravity of cover soil, $G_{s-cover}$	From Attachment H - Radon Emanation Modeling including with this submittal
Unit Weight, γ		
118.0	Maximum dry unit weight of cover soil $\gamma_{cover-max}$ (pcf)	Average calculated from laboratory testing results (UWM, 2012)
100.7	Moist unit weight of cover soil at 80% relative compaction, $\gamma_{cover80}$ (pcf)	Calculated
107.0	Moist unit weight of cover soil at 85% relative compaction, $\gamma_{cover85}$ (pcf)	Calculated
119.6	Moist unit weight of cover soil at 95% relative compaction, $\gamma_{cover95}$ (pcf)	Calculated
100	Dry unit weight of topsoil layer at 85% relative compaction, $\gamma_{topsoil85}$ (pcf)	From Attachment H - Radon Emanation Modeling including with this submittal
105	Moist unit weight of topsoil layer at 85% relative compaction, $\gamma_{topsoil85}$ (pcf)	Calculated
106	Dry unit weight of rock mulch layer at 85% relative compaction, $\gamma_{mulch85}$ (pcf)	Calculated
110	Moist unit weight of rock mulch layer at 85% relative compaction, $\gamma_{mulch85}$ (pcf)	From Attachment H - Radon Emanation Modeling including with this submittal
Void Ratio, e		
0.74	Void Ratio of cover soil at 80% relative compaction, $e_{cover80}$	Calculated
0.64	Void Ratio of cover soil at 85% relative compaction, $e_{cover85}$	Calculated
0.46	Void Ratio of cover soil at 95% relative compaction, $e_{cover95}$	Calculated
0.61	Void Ratio of topsoil at 85% relative compaction, $e_{topsoil85}$	Calculated from porosity presented in Attachment H - Radon Emanation Modeling including with this submittal
0.54	Void Ratio of rock mulch at 85% relative compaction, $e_{mulch85}$	Calculated from porosity presented in Attachment H - Radon Emanation Modeling including with this submittal

Seismic Settlement Coefficients

1.2	Coefficient "a" of Erosion Protection/Topsoil Cover	From Stewart, et al (2004), page 88, Figure 6.6
2.0	Coefficient "a" of General Cover Soil	From Stewart, et al (2004), page 89, Figure 6.7
0.65	Coefficient "a" of High-Compaction Layer	From Stewart, et al (2004), page 89, Figure 6.7
0.80	Coefficient "b" of Erosion Protection/Topsoil Cover	From Stewart, et al (2004), page 88, Figure 6.6
0.65	Coefficient "b" of General Cover Soil	From Stewart, et al (2004), page 89, Figure 6.7
0.75	Coefficient "b" of High-Compaction Layer	From Stewart, et al (2004), page 89, Figure 6.7
0.04%	Strain threshold value of Erosion Protection/Topsoil Cover, γ_{tv}	From Stewart, et al (2004), page 88, Figure 6.6
0.03%	Strain threshold value of General Cover Soil, γ_{tv}	From Stewart, et al (2004), page 89, Figure 6.7
0.02%	Strain threshold value of High-Compaction Layer, γ_{tv}	From Stewart, et al (2004), page 89, Figure 6.7
0.32	Coefficient "R" of Erosion Protection/Topsoil Cover	From Stewart, et al (2004), page 88, for soils with low plasticity fines
0.34	Coefficient "R" of General Cover Soil	From Stewart, et al (2004), page 89, for soils with medium plasticity fines
0.34	Coefficient "R" of High-Compaction Layer	From Stewart, et al (2004), page 89, for soils with medium plasticity fines

Other		
6.7%	Long-term moisture content of cover soil, w_{cover} (%)	Estimated based on measured 15bar water content. (UWM, 2012)
5.2%	Long-term moisture content of topsoil, $w_{topsoil}$ (%)	From Attachment H - Radon Emanation Modeling including with this submittal
4.0%	Long-term moisture content of rock mulch, $w_{rockmulch}$ (%)	From Attachment H - Radon Emanation Modeling including with this submittal
0.14	Compression index of cover soil, $C_c-cover$	Calculated from empirical equation presented in Holtz and Kovacs, 1981. Page 341. $C_c = 0.30 \cdot (e_0 - 0.27)$
51%	Fines content of cover soil (%)	Mean value from laboratory analyses presented in previous response to interrogatories (EFRI, 2012)
11	Plasticity Index of cover soil, PI	Weighted Average from 2010 and 2012 laboratory testing (laboratory results presented in EFRI, 2012)
508	Shear Wave Velocity of Cover Soil, V_s (ft/sec)	Conservatively assumed to be the average of the shear wave velocities measured in Cell 2 tailings

SEISMIC PARAMETERS

0.15	Maximum horizontal acceleration at the ground surface, a_{max}/g	From Probabilistic Seismic Hazard Analysis (MWH, 2015a)
5.5	Magnitude of Design Event, M	From Probabilistic Seismic Hazard Analysis (MWH, 2015a)
20	Site-Source Distance, r (km)	From Probabilistic Seismic Hazard Analysis (MWH, 2015a)
1.00	Stress reduction factor, r_d	Conservatively assumed.
7.51	Equiv. Number of Uniform Strain Cycles, N	Calculated from Stewart, et al (2004), Equation 6.11, page 79, S parameter =0 since shallow soil and rock underlie the tailings (<20m) below tailings
594	Average shear wave velocity for cover, V_s (ft/s)	Conservatively estimated as upper bound average V_s for tailings in Cell 2 in October 2013 (Tailings Data Analysis Report. MWH, 2015b)
495	Average shear wave velocity for tailings (3' - 9.4'), V_s (ft/s)	Conservatively estimated as average V_s over depth range for tailings in Cell 2 in October 2013 (Tailings Data Analysis Report. MWH, 2015b)
460	Average shear wave velocity for tailings (9.4' - 14.4'), V_s (ft/s)	Conservatively estimated as average V_s over depth range for tailings in Cell 2 in October 2013 (Tailings Data Analysis Report. MWH, 2015b)
500	Average shear wave velocity for tailings (14.4' - 19.6'), V_s (ft/s)	Conservatively estimated as average V_s over depth range for tailings in Cell 2 in October 2013 (Tailings Data Analysis Report. MWH, 2015b)
538	Average shear wave velocity for tailings (19.6' - 24.7'), V_s (ft/s)	Conservatively estimated as average V_s over depth range for tailings in Cell 2 in October 2013 (Tailings Data Analysis Report. MWH, 2015b)
594	Average shear wave velocity for tailings (24.7' - liner), V_s (ft/s)	Conservatively estimated as average V_s over depth range for tailings in Cell 2 in October 2013 (Tailings Data Analysis Report. MWH, 2015b)

MISCELLANEOUS PARAMETERS

62.4	Unit Weight of Water, γ_w	
82.4	Atmospheric Pressure, P_a (kPa)	Calculated assuming elev=5600' amsl. http://www.engineeringtoolbox.com/air-altitude-pressure-d_462.html
1722.0	Atmospheric Pressure, P_a (psf)	Unit conversion calculation

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[illegible]

Extra layer added to analyze seismic settlement of tailings below the bottom of CPT investigation

[illegible]

WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 2W3

Data File:	13-52106_SP2W3-BSC-CPT	Idriss and Boulanger (2008)	5613.80	Water surface elevation during CPT investigation (ft amsl)	5615.72	Ground Surface Elevation at time of CPT (ft amsl)
Location:	White Mesa 2013 CPT Investigation	Max. Horiz. Acceleration, Amag: 0.15	5607.44	Water surface elevation at t ₁ (ft amsl)	5626.27	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)
\\1.1.6.2.3_Field Data\2013 Field Investigation\Conotec Data		Earthquake Moment Magnitude, M: 5.5	5597.74	Water surface elevation at t ₂ (ft amsl)	0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement
Tailings Sands		Magnitude Scaling Factor, MSF: 1.69	5592.74	Water surface elevation at t ₃ (ft amsl)	3.50	Thickness of Water Storage/Rooting Zone (ft)
Tailings Sand-Slimes					4.00	Thickness of High Compaction Layer (ft)
Tailings Slimes					2.55	Thickness of Random/Platform Fill on on top of existing interim cover (ft)
Interim Cover		Earthquake Moment Magnitude, M: 5.5	1.44	Scaling Factor for stress ratio, r _{ss}	1164.98	Additional Stress due to Final Cover Placement, Δσ _{FC} (psf)
Cells Requiring User Input/Manipulation			0.47	Volumetric Strain Ratio for Site-Specific Design Earthquake	5592.74	Elevation of bottom of tailings (liner) (ft amsl)
		Magnitude Scaling Factor, MSF: 2.21	7.51	Equiv. Number of Uniform Strain Cycles, N		

	Elev. at Top of Layer (ft)	Elev. At Midpoint of Layer (ft)	Elev. At Bottom of Layer (ft)	Thickness of Layer (ft)	Unit Weight (pcf)	Unit Weight (pcf)	Total Stress at Bottom of Layer	Total Stress at Midpoint of Layer	Equil Pore Pressure at Bottom of Layer	Equil Pore Pressure at Midpoint of Layer (tsf)
FINAL COVER										
Erosion Protection Layer	5626.02	5626.77	5625.77	0.50	0.055	110	0.028	0.014	0.00	0.00
Water Storage/Rooting Zone Layer	5624.02	5622.27	5622.27	3.50	0.054	107	0.215	0.121	0.00	0.00
High Compaction Layer	5620.27	5618.27	5618.27	4.00	0.060	120	0.454	0.334	0.00	0.00
Platform/Random Fill Layer	5617.72	5615.72	5615.72	2.55	0.050	101	0.582	0.518	0.00	0.00

2013 CPT Data from ConeTec															CPT Data Interpretations													Conditions at t ₁																			
Depth at time of CPT (ft)	Elevation (ft amsl)	qt (TSF)	fs (TSF)	qc (TSF)	Pw (u2) (ft)	Pw (u2) PSI	fs/qt (%)	Material Type (as determined)	Unit Weight (pcf)	Unit Weight at time of CPT (pcf)	Stress at time of CPT (tsf)	Pore Pressure (tsf)	Effective Stress at time of CPT (tsf)	Saturated at time of CPT 1=Yes 0=No	CN	qc1 TSF	qc1 MPa	qc1N	Normalized Cone Penetration Resistance, Q _n	Normalized Friction Ratio, f _n (%)	Type Index, I _t	FC	Total Stress at t ₁ (tsf)	Pore Pressure at t ₁ (tsf)	Effective Stress at t ₁ (tsf)	Saturated at t ₁ 1=Yes 0=No	r ₂	C _c	K _s	CSR	Δqc ₁₀	QC _{10-CS}	(CRR)	FoS	r ₂	D ₁	f	K _s	CSR	Kc	QC _{10-CS}	(CRR)	FoS	Avg FoS	Liquefiable? 1=Yes 2=No		
17.388	5598.33	5.4	0.167	5.0	60.4	26.17	3.09%	Slime Tailings	0.057	113.1	0.99	0.48	0.51	1	1.51	7.567	105.17	9.45	9	3.79%	3.1	71%	1.57	0.00	1.57	0	0.90	0.04	0.97	1.0	0.050	33.38	42.83	0.071	1.41	0.93	0.18	0.80	1.11	1.0	0.037	8.01	75.70	0.120	4.93	3.17	2
17.552	5598.17	8.1	0.153	7.8	49.8	21.59	1.90%	Slime Tailings	0.057	113.1	1.00	0.49	0.51	1	1.50	11.622	161.55	14.04	14	2.16%	2.8	71%	1.58	0.00	1.58	0	0.90	0.05	0.97	1.0	0.050	34.98	49.02	0.077	1.52	0.93	0.22	0.80	1.11	1.0	0.037	4.80	67.46	0.109	4.42	2.97	2
17.716	5598.00	12.1	0.146	11.9	23.4	10.13	1.21%	Sand-Slime Tailings	0.059	119.0	1.01	0.49	0.52	1	1.49	17.713	246.21	20.62	21	1.32%	2.5	47%	1.59	0.00	1.59	0	0.89	0.05	0.97	1.0	0.050	37.61	58.43	0.086	1.72	0.93	0.26	0.80	1.11	1.0	0.037	2.91	80.54	0.101	4.06	2.89	2
17.880	5597.84	14.1	0.132	14.0	21.9	9.47	0.94%	Sand-Slime Tailings	0.059	119.0	1.02	0.50	0.52	1	1.46	20.417	283.79	23.94	25	1.01%	2.4	47%	1.60	0.00	1.60	0	0.89	0.06	0.97	1.0	0.050	38.70	62.64	0.091	1.82	0.93	0.28	0.80	1.10	1.0	0.037	2.34	56.01	0.096	3.85	2.84	2
18.044	5597.68	14.0	0.074	13.9	17.3	7.51	0.53%	Sand-Slime Tailings	0.059	119.0	1.03	0.50	0.53	1	1.45	20.197	280.74	23.64	25	0.57%	2.3	47%	1.61	0.00	1.61	1	0.89	0.05	0.97	1.0	0.050	38.59	62.23	0.090	1.81	0.93	0.28	0.80	1.10	1.0	0.037	1.94	45.86	0.088	3.49	2.65	2
18.208	5597.51	11.8	0.070	11.7	17.2	7.43	0.59%	Sand-Slime Tailings	0.059	119.0	1.04	0.51	0.53	1	1.46	16.985	236.10	19.91	20	0.65%	2.4	47%	1.62	0.01	1.62	1	0.89	0.05	0.97	1.0	0.050	37.28	57.19	0.085	1.70	0.93	0.26	0.80	1.10	1.0	0.038	2.31	46.04	0.088	3.46	2.58	2
18.372	5597.35	9.1	0.178	8.9	23.4	10.12	1.96%	Slime Tailings	0.057	113.1	1.05	0.51	0.54	1	1.45	12.930	179.72	15.26	15	2.22%	2.8	71%	1.63	0.01	1.62	1	0.89	0.05	0.97	1.0	0.050	35.40	50.66	0.078	1.56	0.93	0.23	0.80	1.10	1.0	0.038	4.60	70.24	0.112	4.35	2.95	2
18.537	5597.18	6.8	0.214	6.6	44.6	19.31	3.12%	Slime Tailings	0.057	113.1	1.06	0.52	0.54	1	1.44	9.455	131.43	11.45	11	3.70%	3.0	71%	1.64	0.02	1.62	1	0.89	0.05	0.97	1.0	0.050	34.07	45.52	0.073	1.46	0.93	0.20	0.80	1.10	1.0	0.038	7.03	80.43	0.128	4.92	3.19	2
18.701	5597.02	12.2	0.207	12.1	17.2	7.44	1.70%	Sand-Slime Tailings	0.059	119.0	1.07	0.52	0.55	1	1.43	17.226	239.45	20.19	20	1.87%	2.6	47%	1.65	0.02	1.63	1	0.89	0.05	0.97	1.0	0.050	37.38	57.57	0.085	1.70	0.93	0.26	0.80	1.10	1.0	0.038	3.49	70.44	0.113	4.27	2.98	2
18.865	5596.86	12.4	0.172	12.2	21.3	9.23	1.39%	Sand-Slime Tailings	0.059	119.0	1.08	0.53	0.55	1	1.42	17.382	241.62	20.41	21	1.52%	2.6	47%	1.66	0.03	1.63	1	0.89	0.05	0.97	1.0	0.050	37.46	57.87	0.086	1.70	0.93	0.26	0.80	1.09	1.0	0.038	3.17	64.62	0.105	3.94	2.82	2
19.029	5596.69	14.4	0.138	14.3	22.3	9.64	0.96%	Sand-Slime Tailings	0.059	119.0	1.09	0.53	0.55	1	1.40	20.001	278.01	23.46	24	1.04%	2.4	47%	1.67	0.03	1.64	1	0.88	0.05	0.96	1.0	0.050	38.53	61.98	0.090	1.79	0.93	0.28	0.80	1.09	1.0	0.038	2.42	56.88	0.097	3.60	2.70	2
19.193	5596.53	15.7	0.130	15.6	20.8	8.99	0.83%	Sand-Slime Tailings	0.059	119.0	1.10	0.54	0.56	1	1.39	21.538	299.38	25.22	26	0.89%	2.4	47%	1.68	0.04	1.64	1	0.88	0.06	0.96	1.0	0.050	39.15	64.37	0.093	1.84	0.93	0.29	0.80	1.09	1.0	0.039	2.17	54.73	0.095	3.49	2.67	2
19.357	5596.36	16.7	0.123	16.5	23.1	9.99	0.74%	Sand-Slime Tailings	0.059	119.0	1.11	0.54	0.56	1	1.37	22.650	314.83	26.54	28	0.79%	2.3	47%	1.69	0.04	1.65	1	0.88	0.06	0.96	1.0	0.050	39.61	66.14	0.095	1.88	0.93	0.30	0.80	1.09	1.0	0.039	2.00	53.20	0.094	3.41	2.65	2
19.521	5596.20	16.7	0.112	16.5	24.3	10.52	0.67%	Sand-Slime Tailings	0.059	119.0	1.12	0.55	0.57	1	1.36	22.519	313.02	26.39	27	0.72%	2.3	47%	1.70	0.05	1.65	1	0.88	0.06	0.96	1.0	0.050	39.56	65.95	0.095	1.88	0.93	0.30	0.80	1.09	1.0	0.039	1.95	51.52	0.093	3.33	2.60	2
19.685	5596.04	16.2	0.142	16.1	26.1	11.31	0.88%	Sand-Slime Tailings	0.059	119.0	1.13	0.55	0.57	1	1.36	21.815	303.23	25.59	26	0.94%	2.4	47%	1.71	0.05	1.66	1	0.88	0.06	0.96	1.0	0.051	39.28	64.87	0.093	1.85	0.93	0.29	0.80	1.08	1.0	0.039	2.20	56.30	0.097	3.44	2.64	2
19.849	5595.87	13.7	0.203	13.5	30.3	13.14	1.48%	Sand-Slime Tailings	0.059	119.0	1.14	0.56	0.58	1	1.36	18.424	256.09	21.70	22	1.62%	2.6	47%	1.72	0.06	1.66	1	0.88	0.05	0.96	1.0	0.051	37.91	59.61	0.087	1.73	0.93	0.27	0.80	1.08	1.0	0.039	3.13	67.89	0.109	3.85	2.79	2
20.013	5595.71	9.9	0.190	9.6	41.6	18.02	1.92%	Slime Tailings	0.057	113.1	1.15	0.56	0.58	1	1.36	13.071	181.68	15.59	15	2.18%	2.8	71%	1.73	0.06	1.67	1	0.88	0.05	0.97	1.0	0.051	35.52	51.11	0.079	1.54	0.93	0.23	0.80	1.08	1.0	0.039	4.55	71.01	0.113	3.96	2.75	2
20.177	5595.54	8.7	0.172	8.3	65.6	28.43	1.98%	Slime Tailings	0.057	113.1	1.16	0.57	0.59	1	1.35	11.187	155.51	13.64	13	2.28%	2.8	71%	1.74	0.07	1.67	1	0.87	0.05	0.97	1.0	0.051	34.84	48.47	0.076	1.49	0.92	0.21	0.80	1.08	1.0	0.039	5.13	70.00	0.112	3.88	2.68	2
20.341	5595.38	8.9	0.207	8.5	67.9	29.41	2.32%	Slime Tailings	0.057	113.1	1.16	0.57	0.59	1	1.34	11.394	158.38	13.90	13	2.67%	2.9	71%	1.75	0.07	1.67	1	0.87	0.05	0.97	1.0	0.051	34.93	48.82	0.076	1.50	0.92	0.22	0.80	1.08	1.0	0.039	5.43	75.40	0.120	4.12	2.81	2
20.505	5595.22	9.3	0.168	8.9	65.7	28.45	1.81%	Slime Tailings	0.057	113.1	1.17	0.58	0.59	1	1.34	11.840	164.57	14.39	14	2.08%	2.8	71%	1.76	0.08	1.68	1	0.87	0.05	0.97	1.0	0.051	35.10	49.49	0.077													

[illegible]

13-52106_SPM2W-C-BSC-CPT

Location: White Mesa Field 2013 CPT Investigation

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Extra layer added to analyze seismic settlement of tailings below the bottom of CPT investigation

WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 2WS-C																								
Data File: 13-52106_SPWWS-C-RSC-CPT					Location: White Mesa 2013 CPT Investigation					Max. Horiz. Acceleration, Amvavg: 0.15					Earthquake Moment Magnitude, Ms: 6.5					Earthquake Scaling Factor, MSF: 1.69				
1.1.6.2.3 Field Data/2013 Field Investigation/Contact Data					Youd, et al. (2001)					Max. Horiz. Acceleration, Amvavg: 0.15					Earthquake Moment Magnitude, Ms: 5.5					Earthquake Scaling Factor, MSF: 2.21				
Cells Requiring User Input/Manipulation					Magnitude Scaling Factor, MSF: 2.21					Earthquake Number of Uniform Strain Cycles, N: 584.01					Elevation of bottom of tailings (liner) (ft amsl)									
CPT Data from Core/Cont																								
Depth at time of CPT (ft)					Elevation (ft amsl)					TSF					Pw (tsf)					Material Type (as determined)				
Unit Weight (pcf)					Unit Weight (pcf)					Unit Weight (pcf)					Unit Weight (pcf)					Unit Weight (pcf)				
Stress at time of CPT (tsf)					Stress at time of CPT (tsf)					Stress at time of CPT (tsf)					Stress at time of CPT (tsf)					Stress at time of CPT (tsf)				
Saturated at time of CPT (Yes/No)					Saturated at time of CPT (Yes/No)					Saturated at time of CPT (Yes/No)					Saturated at time of CPT (Yes/No)					Saturated at time of CPT (Yes/No)				
CN					CN					CN					CN					CN				
TSF					TSF					TSF					TSF					TSF				
q1					q1					q1					q1					q1				
q1N					q1N					q1N					q1N					q1N				
Normalized Friction Ratio, Rf (%)					Normalized Friction Ratio, Rf (%)					Normalized Friction Ratio, Rf (%)					Normalized Friction Ratio, Rf (%)					Normalized Friction Ratio, Rf (%)				
Type Index, I					Type Index, I					Type Index, I					Type Index, I					Type Index, I				
FC %					FC %					FC %					FC %					FC %				
Conditions at t1																								
Total Stress at t1 (tsf)					Total Stress at t1 (tsf)					Total Stress at t1 (tsf)					Total Stress at t1 (tsf)					Total Stress at t1 (tsf)				
Pore Pressure at t1 (tsf)					Pore Pressure at t1 (tsf)					Pore Pressure at t1 (tsf)					Pore Pressure at t1 (tsf)					Pore Pressure at t1 (tsf)				
Effective Stress at t1 (tsf)					Effective Stress at t1 (tsf)					Effective Stress at t1 (tsf)					Effective Stress at t1 (tsf)					Effective Stress at t1 (tsf)				
Saturated at t1 (Yes/No)					Saturated at t1 (Yes/No)					Saturated at t1 (Yes/No)					Saturated at t1 (Yes/No)					Saturated at t1 (Yes/No)				
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WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 2W5-C									
Data File:	13-S2106_SP2W5-C-RSC-CPT	(driss & Boulanger (2008))	5604.20	Water surface elevation during CPT investigation (ft)	5615.86	Ground Surface Elevation at time of CPT (ft amsl)			
Location:	White Mesa 2013 CPT Investigation	Max. Horiz. Acceleration, Aravg:	0.15	5604.20	5626.28	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)			
1.1.6.2.3 Field Data/2013 Field Investigation/Convec Data		Earthquake Moment Magnitude, M:	5.5	5589.01	0.50	Thickness of Erosion Protection Layer (rock mulch/topsoil) Immediately after placement of Final Cover (ft)			
Tailings Sands		Magitude Scaling Factor, MSF:	1.69	5584.01	4.00	Thickness of Water Storage/Rooting Zone Layer (ft)			
Tailings Sand-Slimes		Youd, et al (2001)			4.00	Thickness of High Compaction Layer (ft)			
Tailings Slimes		Max. Horiz. Acceleration, Aravg:	0.15	1.44	2.42	Thickness of Random/Platform Fill on top of existing inter cover (ft)			
Interim Cover		Earthquake Moment Magnitude, M:	5.5	0.47	1151.89	Additional Stress due to Final Cover Placement, Δσ _{FC} (psf)			
Cells Requiring User Input/Manipulation		Magitude Scaling Factor, MSF:	2.21	7.51	5584.01	Elevation of bottom of tailings (liner) (ft amsl)			

2013 CPT Data from ConeTec										CPT Data Interpretations										Conditions at t ₁										Liquefaction Triggering Analyses																																																						
Depth at time of CPT (ft)	Elevation (ft amsl)	tsf	fs	qc	Pw (u2) (PSI)	fs/ft (%)	Material Type (as determined)	Unit Weight (pcf)	Unit Weight (pcf) at time of CPT	Stress at time of CPT (tsf)	Pore Pressure (tsf)	Stress at time of CPT (tsf)	Saturated at time of CPT 1=Yes 0=No	CN	tsf	qc1 MPa	qc1N	Normalized Cone Penetration Resistance, Q _c	Friction Ratio, F _r (%)	Type Index, I _t	FC %	Total Stress at t ₁ (tsf)	Pore Pressure at t ₁ (tsf)	Effective Stress at t ₁ (tsf)	Saturated at t ₁ 1=Yes 0=No	Cyclic Stress Ratio					Cyclic Resistance Ratio					Cyclic Stress Ratio					Avg FoS	Liquefiable? 1=Yes 2=No																																										
																										Cyclic Stress Ratio					Cyclic Resistance Ratio					Cyclic Stress Ratio																																																
(driss & Boulanger (2008))										Youd et al. (2001)										Youd et al. (2001)																																																																

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WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 2W6-S									
Data File:	13-52106_SP2W6-S-BSC-CPT	Idriss and Boulanger (2008)		5604.40	Water surface elevation during CPT investigation				
Location:	White Mesa 2013 CPT Investigation	Max. Horiz. Acceleration, Amvavg: 0.15		5604.40	Ground Surface Elevation at time of CPT (ft amsl)				
1.1.6.2.3 Field Data/2013 Field Investigation/Convec Data		Earthquake Moment Magnitude, M: 5.5		5589.59	Thickness of Erosion Protection Layer (rock mulch/topsoils) immediately after placement				
Tailings Sands		Magnitude Scaling Factor, MSF: 1.69		5583.59	Thickness of Water Storage/Rooting Zone (ft)				
Tailings Sand-Slimes		Youd, et al (2001)			Thickness of High Compaction Layer (ft)				
Tailings Slimes		Max. Horiz. Acceleration, Amvavg: 0.15		1.44	Thickness of Random Platform Fill on top of existing inter cover (ft)				
Interim Cover		Earthquake Moment Magnitude, M: 5.5		0.47	Additional Stress due to Final Cover Placement, Δσ _{FC} (psf)				
Cells Requiring User Input/Manipulation		Magnitude Scaling Factor, MSF: 2.21		7.51	Elev.ation of bottom of tailings (liner) (ft amsl)				

2013 CPT Data from CoreTect										CPT Data Interpretations										Conditions at t ₁										Liquefaction Triggering Analyses																			
Depth (ft)	Elevation (ft amsl)	tsf	fs	qc	Pw (u2) (ft)	Pw (u2) (ft)	fs/ft (%)	Material Type (as determined)	Unit Weight (pcf)	Unit Weight (pcf)	Stress at time of CPT (tsf)	Pore Pressure at time of CPT (tsf)	Stress at time of CPT (tsf)	Saturated at time of CPT 1=Yes 0=No	CN	qc1 TSF	qc1 MPa	qc1N	Normalized Cone Penetration Resistance, Q _n	Friction Ratio, F _r (%)	Type Index, I _t	FC %	Total Stress at t ₁ (tsf)	Pore Pressure at t ₁ (tsf)	Effective Stress at t ₁ (tsf)	Saturated at t ₁ 1=Yes 0=No	Idriss & Boulanger (2008)										Youd et al (2001)												

WHITE MEA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - ZWT-C														
Data File:	13-52106_SP2W7-C-BSC-CPT													
Location:	White Mea 2013 CPT Investigation													
\\ \ 6.2.3 Field Data\2013 Field Investigation\Concctc Data														
Tailings Sands	Max. Horiz. Acceleration, A _{max} :	0.15	5513.10	Water surface elevation during CPT investigation (ft)	5519.60	Ground Surface Elevation at time of CPT (ft amsl)	Elev. at Top of Layer (ft)	Elev. at Midpoint of Layer (ft)	Elev. at Bottom of Layer (ft)	Thickness of Layer (ft)	Unit Weight (pcf)	Unit Stress at Bottom of Layer (psf)	Total Stress at Bottom of Layer (psf)	Equal Pressure at Bottom of Layer (psf)
	Earthquake Moment Magnitude, M:	5.5	5511.32	Water surface elevation at t ₀ (ft amsl)	5526.65	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	Final Cover	6526.14	6526.14	0.00	0.055	110	0.028	0.014
Tailings Sand-Silts	Max. Horiz. Acceleration, A _{max} :	0.15	5511.32	Water surface elevation at t ₀ (ft amsl)	5526.65	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	Final Cover	6526.14	6526.14	0.00	0.055	110	0.028	0.014
	Earthquake Moment Magnitude, M:	5.5	5511.32	Water surface elevation at t ₀ (ft amsl)	5526.65	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	Final Cover	6526.14	6526.14	0.00	0.055	110	0.028	0.014
Tailings Silts	Max. Horiz. Acceleration, A _{max} :	0.15	5511.32	Water surface elevation at t ₀ (ft amsl)	5526.65	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	Final Cover	6526.14	6526.14	0.00	0.055	110	0.028	0.014
	Earthquake Moment Magnitude, M:	5.5	5511.32	Water surface elevation at t ₀ (ft amsl)	5526.65	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	Final Cover	6526.14	6526.14	0.00	0.055	110	0.028	0.014
Cells Requiring User Input/Manipulation	Max. Horiz. Acceleration, A _{max} :	0.15	5511.32	Water surface elevation at t ₀ (ft amsl)	5526.65	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	Final Cover	6526.14	6526.14	0.00	0.055	110	0.028	0.014
	Earthquake Moment Magnitude, M:	5.5	5511.32	Water surface elevation at t ₀ (ft amsl)	5526.65	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	Final Cover	6526.14	6526.14	0.00	0.055	110	0.028	0.014
	Magnitude Scaling Factor, MSF:	1.69	5590.40	Water surface elevation at t ₀ (ft amsl)	5590.40	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	Final Cover	6526.14	6526.14	0.00	0.055	110	0.028	0.014
	Max. Horiz. Acceleration, A _{max} :	0.15	5511.32	Water surface elevation at t ₀ (ft amsl)	5526.65	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	Final Cover	6526.14	6526.14	0.00	0.055	110	0.028	0.014
	Earthquake Moment Magnitude, M:	5.5	5511.32	Water surface elevation at t ₀ (ft amsl)	5526.65	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	Final Cover	6526.14	6526.14	0.00	0.055	110	0.028	0.014
	Magnitude Scaling Factor, MSF:	2.21	5590.40	Water surface elevation at t ₀ (ft amsl)	5590.40	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	Final Cover	6526.14	6526.14	0.00	0.055	110	0.028	0.014
	Max. Horiz. Acceleration, A _{max} :	0.15	5511.32	Water surface elevation at t ₀ (ft amsl)	5526.65	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	Final Cover	6526.14	6526.14	0.00	0.055	110	0.028	0.014
	Earthquake Moment Magnitude, M:	5.5	5511.32	Water surface elevation at t ₀ (ft amsl)	5526.65	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	Final Cover	6526.14	6526.14	0.00	0.055	110	0.028	0.014
	Magnitude Scaling Factor, MSF:	2.21	5590.40	Water surface elevation at t ₀ (ft amsl)	5590.40	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	Final Cover	6526.14	6526.14	0.00	0.055	110	0.028	0.014
	Max. Horiz. Acceleration, A _{max} :	0.15	5511.32	Water surface elevation at t ₀ (ft amsl)	5526.65	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	Final Cover	6526.14	6526.14	0.00	0.055	110	0.028	0.014
	Earthquake Moment Magnitude, M:	5.5	5511.32	Water surface elevation at t ₀ (ft amsl)	5526.65	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	Final Cover	6526.14	6526.14	0.00	0.055	110	0.028	0.014
	Magnitude Scaling Factor, MSF:	2.21	5590.40	Water surface elevation at t ₀ (ft amsl)	5590.40	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	Final Cover	6526.14	6526.14	0.00	0.055	110	0.028	0.014
	Max. Horiz. Acceleration, A _{max} :	0.15	5511.32	Water surface elevation at t ₀ (ft amsl)	5526.65	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	Final Cover	6526.14	6526.14	0.00	0.055	110	0.028	0.014
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2013 CPT Data from Cone Tech

CPT Data Interpretations

Conditions at Tip

Liquefaction Triggering Analyses

Idris & Boulanger (2008)

Yousif et al. (2001)

Depth at time of CPT (m)	Elevation (ft amsl)	qt (tsf)	fs (tsf)	qc (tsf)	Pw (psf)	Pw (kPa)	fs/qs (%)	Material Type determined	Unit Weight (pcf)	Unit Weight (kN/m³)	Stress at CPT time of test (tsf)	Pore Pressure at CPT time of test (tsf)	Effective Stress at CPT time of test (tsf)	Saturated at CPT time (tsf)	CN	qc1 TSF	qc1 MPa	qc1N	Normalized Resistance, Q _N	Normalized Friction, F _N	Type Index, I _t	Total FS	Pore Pressure at t ₁ (tsf)	Effective Stress at t ₁ (tsf)	Saturated at t ₁ (tsf)	Liquefaction Triggering Analyses										Avg FOS	Liquefiable 1-Yes 2-No																																																																																																																																																																																																																																																																																																																																																																																																																																																	
																										Cyclic Stress Ratio					Cyclic Resistance Ratio							Cyclic Stress Ratio					K _s	CSR	K _c	QC-NCS	(CRR)	FOS																																																																																																																																																																																																																																																																																																																																																																																																																																						
																										f _s	C _s	K _s	CSR	CSR _{max}	f _s	D _r	f _s	D _r	f _s			D _r	f _s	D _r	f _s	D _r							f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r	f _s	D _r

TOTAL SEISMIC SETTLEMENT (FT.)																	0.347
Depth at Z ₀ , m	Wave Velocity, V _s , ft/sec	Soil Density, ρ, lb/ft ³	Shear Strain Modulus, G _s , tsf	P = γ ₀ /G _{max}	ty Index, PI	Shear Strain, γ			d Shear Strain, γ _d		c Strain at 15 Cycles, ε _{c-15} (%)		Strain for Design Event, ε _d (%)		I Consolidat- on (R)		
						g ₁	g ₂	γ	a	b	R	c	C _u				
2.20	594	1.6E-03	5.5E-02	7.3E-05	11	0.162	11360	0.01%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
2.25	594	1.6E-03	5.5E-02	7.5E-05	11	0.163	11268	0.01%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
2.30	594	1.6E-03	5.5E-02	7.6E-05	11	0.164	11177	0.01%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
2.35	594	1.6E-03	5.5E-02	7.8E-05	11	0.164	11090	0.01%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
2.40	594	1.6E-03	5.5E-02	7.9E-05	11	0.165	11004	0.01%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
2.45	594	1.6E-03	5.5E-02	8.1E-05	11	0.166	10921	0.01%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
2.50	594	1.6E-03	5.5E-02	8.2E-05	11	0.167	10840	0.01%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
2.55	594	1.6E-03	5.5E-02	8.3E-05	11	0.168	10761	0.01%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
2.60	594	1.6E-03	5.5E-02	8.5E-05	11	0.168	10683	0.01%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
2.65	594	1.6E-03	5.5E-02	8.6E-05	11	0.169	10608	0.01%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
2.70	594	1.6E-03	5.5E-02	8.8E-05	11	0.170	10535	0.01%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
2.75	594	1.6E-03	5.5E-02	8.9E-05	11	0.170	10463	0.01%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
2.80	594	1.6E-03	5.5E-02	9.1E-05	11	0.171	10392	0.01%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
2.85	594	1.6E-03	5.5E-02	9.2E-05	11	0.172	10324	0.01%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
2.90	594	1.6E-03	5.5E-02	9.4E-05	11	0.173	10257	0.01%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
2.95	594	1.6E-03	5.5E-02	9.5E-05	11	0.173	10191	0.01%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
3.00	594	1.6E-03	5.5E-02	9.7E-05	11	0.174	10127	0.01%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
3.05	594	1.6E-03	5.5E-02	9.8E-05	11	0.175	10064	0.01%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
3.10	495	1.8E-03	3.8E-02	1.4E-04	10	0.175	10002	0.02%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
3.15	495	1.8E-03	3.8E-02	1.6E-04	10	0.176	10210	0.02%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
3.20	495	1.4E-03	3.5E-02	1.8E-04	10	0.177	10153	0.03%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
3.25	495	1.4E-03	3.5E-02	1.6E-04	10	0.177	10098	0.03%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
3.30	495	1.4E-03	3.5E-02	1.8E-04	10	0.178	10044	0.03%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
3.35	495	1.4E-03	3.5E-02	1.7E-04	10	0.179	9991	0.03%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
3.40	495	1.4E-03	3.5E-02	1.7E-04	10	0.179	9938	0.03%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
3.45	495	1.4E-03	3.5E-02	1.7E-04	10	0.180	9887	0.03%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
3.50	495	1.4E-03	3.5E-02	1.7E-04	10	0.180	9837	0.03%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
3.55	495	1.4E-03	3.5E-02	1.7E-04	10	0.181	9787	0.03%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
3.60	495	1.4E-03	3.5E-02	1.8E-04	10	0.181	9739	0.03%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
3.65	495	1.4E-03	3.5E-02	1.8E-04	10	0.182	9691	0.03%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
3.70	495	1.4E-03	3.5E-02	1.8E-04	10	0.183	9644	0.03%	2.00	0.65	0.03%	0.001	0.34	0.079	0.765	0.17%	0.0003
3.75	495	1.4E-03	3.5E-02	1.8E-04	10	0.183	9597	0.03%	2.00	0.65	0.03%	0.001	0.34	0.079	0.765	0.23%	0.0004
3.80	495	1.4E-03	3.5E-02	1.8E-04	10	0.184	9552	0.03%	2.00	0.65	0.03%	0.002	0.34	0.079	0.765	0.28%	0.0005
3.85	495	1.4E-03	3.5E-02	1.9E-04	10	0.184	9507	0.03%	2.00	0.65	0.03%	0.002	0.34	0.079	0.765	0.33%	0.0005
3.90	495	1.4E-03	3.5E-02	1.9E-04	10	0.185	9463	0.03%	2.00	0.65	0.03%	0.002	0.34	0.079	0.765	0.38%	0.0006
3.95	495	1.3E-03	3.1E-02	2.1E-04	16	0.438	7751	0.05%	2.00	0.65	0.03%	0.008	0.34	0.079	0.765	1.18%	0.0019
4.00	495	1.4E-03	3.5E-02	1.9E-04	10	0.186	9382	0.03%	2.00	0.65	0.03%	0.003	0.34	0.079	0.765	0.46%	0.0008
4.05	495	1.4E-03	3.5E-02	1.9E-04	10	0.186	9339	0.04%	2.00	0.65	0.03%	0.003	0.34	0.079	0.765	0.50%	0.0008
4.10	495	1.4E-03	3.5E-02	2.0E-04	10	0.187	9298	0.04%	2.00	0.65	0.03%	0.004	0.34	0.079	0.765	0.54%	0.0009
4.15	495	1.4E-03	4.0E-02	1.6E-04	11	0.187	9257	0.04%	2.00	0.65	0.03%	0.004	0.34	0.079	0.765	0.58%	0.0009
4.20	495	1.8E-03	4.5E-02	1.6E-04	10	0.188	9195	0.02%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
4.25	495	1.8E-03	4.5E-02	1.6E-04	10	0.189	9144	0.02%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
4.30	495	1.8E-03	4.5E-02	1.6E-04	10	0.189	9095	0.02%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
4.35	495	1.8E-03	4.5E-02	1.6E-04	10	0.190	9047	0.03%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
4.40	495	1.8E-03	4.5E-02	1.7E-04	10	0.190	8999	0.03%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
4.45	495	1.8E-03	4.5E-02	1.7E-04	10	0.191	8953	0.03%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
4.50	495	1.8E-03	4.5E-02	1.7E-04	10	0.192	8907	0.03%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
4.55	495	1.8E-03	4.3E-02	1.8E-04	16	0.444	7292	0.03%	2.00	0.65	0.03%	0.003	0.34	0.079	0.765	0.40%	0.0007
4.60	495	1.8E-03	4.5E-02	1.7E-04	10	0.193	8820	0.03%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
4.65	495	1.8E-03	4.5E-02	1.8E-04	16	0.193	8778	0.03%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
4.70	495	1.8E-03	4.5E-02	1.8E-04	10	0.193	8733	0.03%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
4.75	495	1.8E-03	4.5E-02	1.8E-04	10	0.195	8691	0.03%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
4.80	495	1.8E-03	4.5E-02	1.8E-04	10	0.195	8650	0.03%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000
4.85	495	1.8E-03	4.5E-02	1.9E-04	10	0.196	8609	0.03%	2.00	0.65	0.03%	0.001	0.34	0.079	0.765	0.11%	0.0002
4.90	495	1.8E-03	4.5E-02	1.9E-04	10	0.196	8569	0.03%	2.00	0.65	0.03%	0.001	0.34	0.079	0.765	0.18%	0.0003
4.95	495	1.8E-03	4.5E-02	1.9E-04	10	0.197	8529	0.03%	2.00	0.65	0.03%	0.002	0.34	0.079	0.765	0.23%	0.0004
5.00	460	1.8E-03	3.9E-02	2.2E-04	10	0.197	8491	0.04%	2.00	0.65	0.03%	0.006	0.34	0.079	0.765	0.90%	0.0015
5.05	460	1.8E-03	3.7E-02	2.4E-04	16	0.450	6956	0.05%	2.00	0.65	0.03%	0.009	0.34	0.079	0.765	1.36%	0.0022
5.10	460	1.8E-03	3.9E-02	2.3E-04	10	0.198	8416	0.04%	2.00	0.65	0.03%	0.006	0.34	0.079	0.765	0.97%	0.0016
5.15	460	1.8E-03	3.7E-02	2.5E-04	16	0.461	6897	0.05%	2.00	0.65	0.03%	0.009	0.34	0.079	0.765	1.02%	0.0016
5.20	460	1.8E-03	3.9E-02	2.3E-04	10	0.199	8344	0.05%	2.00	0.65	0.03%	0.007	0.34	0.079	0.765	1.04%	0.0017
5.25	460	1.8E-03	3.9E-02	2.3E-04	10	0.200	8308	0.05%	2.00	0.65	0.03%	0.007	0.34	0.079	0.765	1.08%	0.0018
5.30	460	1.8E-03	3.9E-02	2.4E-04	10	0.201	8273	0.05%	2.00	0.65	0.03%	0.007	0.34	0.079	0.765	1.11%	0.0018
5.35	460	1.8E-03	3.9E-02	2.4E-04	10	0.201	8238	0.05%	2.00	0.65	0.03%	0.007	0.34	0.079	0.765	1.15%	0.0019
5.40	460	1.8E-03	3.9E-02	2.4E-04	10	0.202	8203	0.05%	2.00	0.65	0.03%	0.008	0.34	0.079	0.765	1.18%	0.0019
5.45	460	1.8E-03	3.9E-02	2.4E-04	10	0.202	8169	0.05%	2.00	0.65	0.03%	0.008	0.34	0.079	0.765	1.22%	0.0020
5.50	460	1.8E-03	3.9E-02	2.5E-04	10	0.203	8138	0.05%	2.00	0.65	0.03%	0.008	0.34	0.079	0.765	1.25%	0.0021
5.55	460	1.8E-03	3.9E-02	2.5E-04													

[illegible]

Extra layer added to analyze seismic settlement of tailings below the bottom of CPT investigation

WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 2E1									
Data File:	13-52106_SPE2E1-BSC-CPT			Idris and Boulanger (2008)			5619.10		
Location:	White Mesa 2013 CPT Investigation			Max. Horiz. Acceleration, Amavg: 0.15			5611.67		
1.1, 6.2, 3. Field Data/2013 Field Investigation/Connetc Data				Earthquake Moment Magnitude, Mw: 5.5			5595.46		
Tailings Sand				Magnitude Scaling Factor, MSF: 1.69			5590.46		
Tailings Sand Slimes				Youd et al. (2001)					
Interin Cover				Max. Horiz. Acceleration, Amavg: 0.15			1.44		
Cells Requiring User Input/Manipulation				Earthquake Moment Magnitude, Mw: 5.5			0.47		
				Magnitude Scaling Factor, MSF: 2.21			7.51		
							Equip. Number of		

2013 CPT Data from Connetc										CPT Data Interpretations										Conditions at t ₀										Liquefaction Triggering Analyses																	
Depth (ft)	Elevation (ft)	tsf	tsf	tsf	Pw (u2) (psi)	Pw (u2) (psi)	fsd (%)	Material Type (as determined)	Unit Weight (pcf)	Unit Weight (pcf)	Stress at time of CPT (tsf)	Pore Pressure at time of CPT (tsf)	Stress at time of CPT (tsf)	Saturated at time of CPT (tsf)	CN	q1 TSF	q1 MPa	q1N kN/m ²	Normalized Friction Ratio, R _f	Normalized Friction Ratio, R _f	Type Index, I _t	FC %	Total Stress at t ₀ (tsf)	Pore Pressure at t ₀ (tsf)	Effective Stress at t ₀ (tsf)	Saturated at t ₀ (tsf)	Idris & Boulanger (2008)										Youd et al. (2001)										
																											r _s	C _u	K _u	K _u	CSR	Cyclic Resistance Ratio (CRR)	Δq _{CS}	Q _{CS}	Q _{CS}	FoS	r _s	D ₁	K _u	K _u	CSR	K _u	Q _{CS}	(CRR)	FoS	AvG	Liquefiable Yes/No
0.164	5619.79	13.5	0.067	13.5	-0.0	-0.01	0.42%	Interin Cover	0.050	100.7	0.01	0.00	0.01	0	1.70	22.93	318.77	26.63	1632	0.42%	0.9	51%	0.59	0.00	0.59	0	1.00	0.06	1.02	1.0	0.059	39.67	66.30	0.95	1.81	0.98	0.30	0.80	2.53	1.0	0.017	1.00	26.63	0.072	174.99	98.30	2
0.328	5619.62	36.9	0.100	36.9	0.1	0.05	0.43%	Interin Cover	0.050	100.7	0.02	0.00	0.02	0	1.70	62.713	871.71	72.84	2232	0.43%	0.9	51%	0.60	0.00	0.60	0	1.00	0.09	1.03	1.0	0.060	55.88	128.72	2.00	3.35	0.97	0.49	0.75	2.65	1.0	0.016	1.00	72.84	0.116	140.58	71.97	2
0.492	5619.46	45.5	0.725	45.5	0.2	0.09	1.59%	Interin Cover	0.050	100.7	0.02	0.00	0.02	0	1.70	77.330	1074.93	89.82	1834	1.59%	1.4	51%	0.61	0.00	0.61	0	1.00	0.10	1.03	1.0	0.060	61.84	151.66	0.79	4.67	0.97	0.55	0.73	2.64	1.0	0.016	1.00	89.82	0.147	119.19	61.93	2
0.656	5619.29	78.6	0.721	78.6	0.4	0.19	0.92%	Interin Cover	0.050	100.7	0.03	0.00	0.03	0	1.70	133.671	1858.03	156.26	2379	0.92%	1.2	51%	0.61	0.00	0.61	0	1.00	0.17	1.06	1.0	0.061	84.80	240.06	1.00	16.37	0.97	0.72	0.64	3.23	1.0	0.013	1.00	155.26	0.428	259.71	138.04	2
0.820	5619.13	133.5	1.017	133.5	1.1	0.48	0.76%	Interin Cover	0.050	100.7	0.04	0.00	0.04	0	1.70	226.865	3153.42	263.50	3230	0.76%	1.1	51%	0.62	0.00	0.62	0	1.00	0.30	1.01	1.0	0.061	122.79	386.30	1.00	15.76	0.97	0.94	0.60	3.37	1.0	0.014	1.00	263.50	1.000	485.59	250.68	2
0.984	5618.97	159.6	1.857	159.6	1.1	0.48	1.16%	Interin Cover	0.050	100.7	0.05	0.00	0.05	0	1.70	271.388	3772.29	315.21	3220	1.16%	1.3	51%	0.63	0.00	0.63	0	1.00	0.30	1.09	1.0	0.063	140.94	456.15	1.000	15.82	0.97	1.03	0.60	3.13	1.0	0.013	1.00	315.21	1.000	404.82	210.32	2
1.148	5618.80	202.0	1.570	202.0	1.5	0.86	0.78%	Interin Cover	0.050	100.7	0.06	0.00	0.06	0	1.70	343.332	4772.31	398.78	3491	0.78%	1.1	51%	0.64	0.00	0.64	0	1.00	0.30	1.09	1.0	0.063	170.26	569.04	1.000	15.87	0.97	1.15	0.60	2.95	1.0	0.015	1.00	398.78	1.000	347.12	181.50	2
1.312	5618.64	282.1	2.902	282.1	2.0	0.86	0.78%	Interin Cover	0.050	100.7	0.07	0.00	0.07	0	1.70	479.536	6665.55	556.98	4287	0.78%	1.3	51%	0.65	0.00	0.65	0	1.00	0.30	1.09	1.0	0.063	225.78	782.76	1.000	16.01	0.97	1.36	0.60	2.79	1.0	0.015	1.00	556.98	1.000	303.85	159.89	2
1.476	5618.47	258.9	3.931	258.9	2.8	1.31	2.01%	Interin Cover	0.050	100.7	0.07	0.00	0.07	0	1.70	439.552	6109.77	510.55	3477	1.51%	1.4	51%	0.65	0.00	0.65	0	1.00	0.30	1.08	1.0	0.063	209.49	720.03	1.000	15.99	0.97	1.30	0.60	2.66	1.0	0.016	1.00	510.55	1.000	270.20	143.09	2
1.640	5618.31	203.5	4.263	203.5	3.0	1.31	2.09%	Interin Cover	0.050	100.7	0.08	0.00	0.08	0	1.70	345.933	4608.47	401.82	2462	2.01%	1.5	51%	0.66	0.00	0.66	0	1.00	0.30	1.08	1.0	0.062	171.33	573.15	1.000	16.04	0.97	1.16	0.60	2.55	1.0	0.017	1.00	401.82	1.000	243.27	129.66	2
1.804	5618.15	196.8	3.157	196.7	3.1	1.46	1.60%	Interin Cover	0.050	100.7	0.09	0.00	0.09	0	1.70	334.441	4646.73	388.47	2164	1.61%	1.4	51%	0.67	0.00	0.67	0	1.00	0.30	1.07	1.0	0.062	166.65	555.12	1.000	16.10	0.97	1.14	0.60	2.46	1.0	0.017	1.00	388.47	1.000	221.25	118.97	2
1.968	5617.98	198.9	2.435	198.9	3.1	1.34	1.22%	Interin Cover	0.050	100.7	0.10	0.00	0.10	0	1.70	338.113	4699.77	392.74	2005	1.22%	1.3	51%	0.68	0.00	0.68	0	1.00	0.30	1.07	1.0	0.062	168.14	560.98	1.000	16.17	0.97	1.14	0.60	2.37	1.0	0.018	1.00	392.74	1.000	202.89	109.53	2
2.133	5617.82	169.5	1.671	169.5	3.4	1.46	0.90%	Interin Cover	0.050	100.7	0.11	0.00	0.11	0	1.70	288.167	4005.52	334.73	1578	0.99%	1.2	51%	0.69	0.00	0.69	0	1.00	0.30	1.07	1.0	0.062	147.17	482.52	1.000	16.23	0.97	1.06	0.60	2.30	1.0	0.019	1.00	334.73	1.000	187.35	101.79	2
2.297	5617.65	152.5	1.369	152.5	3.4	1.45	0.90%	Interin Cover	0.050	100.7	0.12	0.00	0.12	0	1.70	258.952	3599.44	300.80	1318	0.90%	1.2	51%	0.70	0.00	0.70	0	1.00	0.30	1.06	1.0	0.061	135.88	436.68	1.000	16.30	0.97	1.00	0.60	2.23	1.0	0.019	1.00	300.80	1.000	174.04	95.17	2
2.461	5617.49	96.6	1.501	96.6	1.4	0.60	1.55%	Interin Cover	0.050	100.7	0.12	0.00	0.12	0	1.70	164.203	2282.42	190.73	719	1.56%	1.5	51%	0.70	0.00	0.70	0	1.00	0.24	1.05	1.0	0.060	97.25	287.98	1.000	16.57	0.97	0.80	0.60	2.17	1.0	0.020	1.00	190.73	1.000	162.50	89.54	2
2.625	5617.33	111.8	1.580	111.8	1.3	0.55	1.41%	Interin Cover	0.050	100.7	0.13	0.00	0.13	0	1.70	190.060	2641.83	220.76	845	1.41%	1.5	51%	0.71	0.00	0.71	0	1.00	0.30	1.06	1.0	0.061	107.79	328.55	1.000	16.44	0.97	0.86	0.60	2.12	1.0	0.020	1.00	220.76	1.000	152.41	84.42	2
2.789	5617.16	136.8	1.973	136.8	1.2	0.50	1.44%	Interin Cover	0.050	100.7	0.14	0.00	0.14	0	1.61	220.642	3066.92	256.28	973	1.44%	1.5	51%	0.72	0.00	0.72	0	0.99	0.30	1.05	1.0	0.061	120.26	376.53	1.000	16.51	0.97	0.92	0.60	2.07	1.0	0.021	1.00	256.28	1.000	143.50	80.00	2
2.953	5617.00	124.7	1.720	124.7	1.6	0.69	1.38%	Interin Cover	0.050	100.7	0.15	0.00	0.15	0	1.64	204.705	2845.41	237.77	837	1.38%	1.5	51%	0.73	0.00	0.73	0	0.99	0.30	1.05	1.0	0.060	113.76	351.53	1.000	16.58	0.97	0.89	0.60	2.02	1.0	0.021	1.00	237.77	1.000	135.58	76.08	2
3.117	5616.83	124.7	1.712	124.7	1.4	0.61	1.37%	Interin Cover	0.050	100.7	0.16	0.00	0.16	0	1.63	202.585	2815.93	235.31	793	1.37%	1.5	51%	0.74	0.00	0.74	0	0.99	0.30	1.05	1.0	0.060	112.90	348.20	1.000	16.64	0.97	0.89	0.60	1.98	1.0	0.022	1.00	235.31	1.000	128.49	72.57	2
3.281	5616.67	121.9	1.635	121.9	1.2	0.52	1.34%	Sand/Tailings	0.051	102.8	0.17	0.00	0.17	0	1.62	197.483	2744.73	229.35	736	1.34%	1.5	18%	0.75	0.00	0.75	0	0.99	0.30	1.04	1.0	0.060	80.72	310.08	1.000	16.71	0.97	0.87	0.60	1.93	1.0	0.022	1.00	229.35	1.000	121.99	69.35	2
3.445	5616.51	127.2	1.702	127.2	0.9	0.41	1.38%	Sand/Tailings	0.051	102.8	0.17	0.00	0.17	0	1.59	189.432	2721.75	231.69	721	1.38%	1.5	18%	0.75	0.00	0.75	0	0.99	0.30	1.04	1.0	0.060	81.32	313.02	1.000	16.78	0.97	0.88	0.60	1.90	1.0	0.022	1.00	231.69	1.000	141.12	69.45	2
3.609	5616.34	150.5	1.842	150.5	1.6	0.68	1.22%	Sand/Tailings	0.051	102.8	0.18	0.00	0.18	0	1.51	226.750	3151.82	263.37	825	1.22%	1.4	18%	0.76	0.00	0.76	0	0.99	0.30	1.04	1.0	0.059	89.42	352.79	1.000	16.85	0.97	0.94	0.60	1.86	1.0	0.023	1.00	263.37	1.000	101.79	63.82	2
3.773	5616.18	107.6	1.906	107.6	1.3	0.56	1.77%	Sand/Tailings	0.051	102.8	0.19	0.00	0.19	0	1.63	175.430	2438.48	203.77	563	1.78%	1.6	18%	0.77	0.00	0.77	0	0.99	0.27	1.03	1.0	0.059	74.18	277.95	1.000	16.97	0.97	0.82	0.60	1.83	1.0	0.023	1.00	203.77	1.000	105.93	61.45	2
3.937	5616.01	87.2	1.794	87.2	1.1	0.46	2.06%	Sand-Slime Tailings	0.047	93.3	0.20	0.00	0.2																																		

File Name: 13-52106_SP2E1-BSC-CPT

Location: White Mesa SP2E1 CPT Investigation

A.1.8.2.3 Field Data (2013 Field Investigation) (Concise Data)

Driss and Boulanger (2008)

Earthquake Moment Magnitude, M_w

Magnitude Scaling Factor, MSF:

Yoshida et al. (2001)

Max. Horiz. Acceleration, A_{max}

Earthquake Moment Magnitude, M_w

Magnitude Scaling Factor, MSF:

5613.10

5611.67

5619.95

5630.46

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Extra layer added to analyze seismic settlement of tailings below the bottom of CPT investigation

File Name: 43-52062_SPS-15-BSC-CPT

Date: 11/23/2023

Location: \\V6.2.3_FieldData\White Mesa Field Investigation\Contec Data

White Mesa Tailings Repository Liquefaction and Seismic Settlement Analyses - 3-1S

Driss and Boulanger (2000)

Earthquake Moment Magnitude, M: 6.5

Magnitude Scaling Factor, MSF: 1.69

Max Horiz. Acceleration, Amax/g: 0.15

Earthquake Moment Magnitude, M: 5.5

Magnitude Scaling Factor, MSF: 2.21

5508.00

Water surface elevation at t₀ (ft) (msl)

5502.47

Water surface elevation at t₁ (ft) (msl)

5505.59

Water surface elevation at t₂ (ft) (msl)

5509.50

Water surface elevation at t₃ (ft) (msl)

1.44

Scaling Factor for stress ratio, r_{ts}

0.47

Volume Strain Ratio for Site-Specific Design

7.51

Equivalent Uniform Strain Cycles, N

5612.56

Ground Surface Elevation at time of CPT investigation (ft) (msl)

5620.47

Ground Surface Elevation Immediately after Placement of Final Cover (ft) (msl)

0.50

Thickness of Erosion Protection Layer (rock mulch/slopops) immediately after placement (ft)

0.50

Thickness of Water Storage/Rooting Zone (ft)

3.50

Thickness of High Compaction Layer (ft)

0.41

Thickness of Random/Platform Fill on cover of existing interior cover (ft)

887.10

Additional Stress Due to Final Cover Placement, Δσ_{vc} (psf)

Final Cover

Erosion Protection Layer ##### 5620.22 5619.97 0.50 0.055 0.0 0.028 0.014 0.00 0.00 0.028 0.014

Water Storage/Rooting Zone Layer ##### 5618.22 5616.47 3.50 0.054 0.107 0.215 0.121 0.00 0.00 0.215 0.121

High Compaction Layer ##### 5614.72 5612.97 3.50 0.060 120 0.424 0.320 0.00 0.00 0.424 0.320

Platform/Random Fill Layer ##### 5612.77 5612.56 0.41 0.050 101 0.445 0.434 0.00 0.00 0.445 0.434

5612.56

Ground Surface Elevation at time of CPT investigation (ft) (msl)

5620.47

Ground Surface Elevation Immediately after Placement of Final Cover (ft) (msl)

0.50

Thickness of Erosion Protection Layer (rock mulch/slopops) immediately after placement (ft)

0.50

Thickness of Water Storage/Rooting Zone (ft)

3.50

Thickness of High Compaction Layer (ft)

0.41

Thickness of Random/Platform Fill on cover of existing interior cover (ft)

887.10

Additional Stress Due to Final Cover Placement, Δσ_{vc} (psf)

Seismic Settlement Analysis - Stewart et al. (2004)

TOTAL SEISMIC SETTLEMENT (FT)

0.235

Depth at time of CPT (ft)

Elevation (ft)

Is (ft)

qc (tsf)

Pw (in)

Pw (in)

fs/ft (%)

Material Type (as determined)

Unit Weight (pcf)

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Extra layer added to analyze seismic settlement of tailings below the bottom of CPT investigation

WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 3-2C

Data File: 13-52106_SP3-2C-BSC-CPT	Idris and Boulanger (2008)
Location: White Mesa 2013 CPT Investigation	Max Horiz. Acceleration, A _{max} : 0.15
Equilibrium Magnitude, M ₀ : 6.0	
Tailings Sands: Magnitude Scaling Factor, M _{SCF} : 1.62	
Tailings Sand-Slimes	
Tailings Slimes	Max Horiz. Acceleration, A _{max} : 0.15
Interim Cover	Earthquake Moment Magnitude, M ₀ : 5.5
Cells Requiring Input/Manipulation	Magnitude Scaling Factor, M _{SCF} : 2.21

2013 CPT Data from CoreTech

Depth at time of CPT (ft)	Elevation (ft)	q _t (tsf)	f _{sc} (%)	P _w (u2) (tsf)	P _w (tsf)	f _{sc} /P _w (%)	Material Type as determined	Unit Weight (pcf)	Unit Weight (pcf)	Stress at time of CPT (tsf)	Pore Pressure (tsf)	Stress at time of CPT (tsf)	Saturated at time of CPT (Yes/No)	CPT Data Interpretations												
														CN	qc1	qc1	qc1N	Normalized Penetration Resistance	Normalized Friction Ratio, f _r (%)	Type Index, I _t	FC %	Total Stress (tsf)	Pore Pressure (tsf)	Effective Stress (tsf)	Saturated at time of CPT (Yes/No)	
0.164	5610.66	9.5	0.818	9.5	10.4	4.49	8.58%	Interim Cover	0.050	100.7	0.01	0.00	0.01	0	1.70	16.099	223.78	18.83	1153	8.59%	2.2	###	0.59	0.00	0.59	0
0.328	5610.49	67.8	0.428	67.8	8.7	3.76	0.63%	Interim Cover	0.050	100.7	0.02	0.00	0.02	0	1.70	115.243	1601.88	133.95	4105	0.63%	1.0	###	0.60	0.00	0.60	0
0.492	5610.33	104.7	0.603	104.7	9.9	3.44	0.58%	Interim Cover	0.050	100.7	0.02	0.00	0.02	0	1.70	177.871	2472.41	208.68	4223	0.58%	1.0	###	0.61	0.00	0.61	0
0.656	5610.18	73.4	0.692	73.3	5.6	2.42	0.59%	Interim Cover	0.050	100.7	0.03	0.00	0.03	0	1.70	124.691	1732.79	144.86	2219	0.59%	1.2	###	0.62	0.00	0.62	0
0.820	5610.00	90.8	1.617	90.7	4.4	1.90	1.78%	Interim Cover	0.050	100.7	0.04	0.00	0.04	0	1.70	154.241	2143.95	179.20	2196	1.78%	1.5	###	0.62	0.00	0.62	0
0.984	5609.84	98.7	0.951	98.7	4.8	2.06	0.96%	Interim Cover	0.050	100.7	0.05	0.00	0.05	0	1.70	167.790	2332.28	194.94	1991	0.96%	1.2	###	0.63	0.00	0.63	0
1.148	5609.67	142.9	1.153	142.9	5.8	2.53	0.81%	Interim Cover	0.050	100.7	0.06	0.00	0.06	0	1.70	242.879	3376.02	282.16	2470	0.81%	1.1	###	0.64	0.00	0.64	0
1.312	5609.51	142.3	0.768	142.3	5.6	2.43	0.54%	Interim Cover	0.050	100.7	0.07	0.00	0.07	0	1.70	241.910	3362.55	283.03	2153	0.54%	1.0	###	0.65	0.00	0.65	0
1.476	5609.34	150.3	0.664	150.3	3.4	1.49	0.64%	Interim Cover	0.050	100.7	0.07	0.00	0.07	0	1.70	255.544	3552.06	296.84	2021	0.64%	1.0	###	0.66	0.00	0.66	0
1.640	5609.18	142.9	0.948	142.9	4.8	2.08	0.66%	Interim Cover	0.050	100.7	0.08	0.00	0.08	0	1.70	242.872	3375.78	282.13	1729	0.66%	1.1	###	0.67	0.00	0.67	0
1.804	5609.03	129.4	0.964	129.4	5.6	2.42	0.59%	Interim Cover	0.050	100.7	0.09	0.00	0.09	0	1.70	220.643	3069.64	252.32	1428	0.59%	1.2	###	0.68	0.00	0.68	0
1.968	5608.85	134.9	1.437	134.9	3.7	1.61	1.07%	Interim Cover	0.050	100.7	0.10	0.00	0.10	0	1.70	229.313	3187.45	265.38	1360	1.07%	1.3	###	0.68	0.00	0.68	0
2.132	5608.69	130.9	0.753	130.9	2.7	1.15	0.58%	Interim Cover	0.050	100.7	0.11	0.00	0.11	0	1.70	222.496	3092.69	258.45	1218	0.58%	1.1	###	0.69	0.00	0.69	0
2.297	5608.52	120.4	0.968	120.4	3.4	1.47	0.80%	Interim Cover	0.050	100.7	0.12	0.00	0.12	0	1.70	204.714	2845.52	237.80	1040	0.80%	1.2	###	0.70	0.00	0.70	0
2.461	5608.36	98.7	1.136	98.7	3.8	1.64	1.15%	Interim Cover	0.050	100.7	0.12	0.00	0.12	0	1.70	177.737	2332.04	194.90	796	1.15%	1.4	###	0.71	0.00	0.71	0
2.625	5608.20	75.5	1.164	75.5	3.5	1.50	1.54%	Interim Cover	0.050	100.7	0.13	0.00	0.13	0	1.70	126.387	1784.30	149.10	570	1.54%	1.6	###	0.72	0.00	0.72	0
2.789	5608.03	54.0	0.768	54.0	2.0	0.85	1.42%	Interim Cover	0.050	100.7	0.14	0.00	0.14	0	1.70	91.749	1275.31	108.59	383	1.42%	1.8	###	0.72	0.00	0.72	0
2.953	5607.87	11.2	0.603	11.2	1.7	1.18	0.73%	Interim Cover	0.050	100.7	0.15	0.00	0.15	0	1.70	183.929	1833.98	156.30	336	0.73%	1.5	###	0.73	0.00	0.73	0
3.117	5607.70	56.9	1.004	56.9	1.7	1.18	1.52%	Interim Cover	0.050	100.7	0.16	0.00	0.16	0	1.70	96.713	1314.31	112.36	362	1.52%	1.8	###	0.74	0.00	0.74	0
3.281	5607.54	64.2	0.738	64.2	2.1	0.92	1.15%	Sand Tailings	0.051	102.8	0.17	0.00	0.17	0	1.70	109.174	1517.52	126.83	387	1.15%	1.6	###	0.75	0.00	0.75	0
3.445	5607.38	52.1	0.886	52.1	2.0	0.87	1.70%	Sand-Slime Tailings	0.047	93.3	0.17	0.00	0.17	0	1.70	88.570	1231.12	102.80	300	1.71%	1.8	###	0.76	0.00	0.76	0
3.609	5607.21	29.1	0.041	29.1	0.7	0.30	3.58%	Slime Tailings	0.041	82.7	0.18	0.00	0.18	0	1.70	49.436	687.05	57.43	161	3.60%	2.2	###	0.76	0.00	0.76	0
3.773	5607.05	21.5	1.042	21.5	1.5	0.65	4.84%	Slime Tailings	0.041	82.7	0.19	0.00	0.19	0	1.70	36.550	508.16	42.47	114	4.89%	2.4	###	0.77	0.00	0.77	0
3.937	5606.88	16.3	0.678	16.3	1.4	0.44	4.14%	Slime Tailings	0.041	82.7	0.19	0.00	0.19	0	1.70	27.774	385.64	32.26	83	4.19%	2.4	###	0.78	0.00	0.78	0
4.101	5606.72	18.3	0.610	18.3	5.0	2.41	3.35%	Slime Tailings	0.041	82.7	0.20	0.00	0.20	0	1.70	31.008	431.01	36.08	90	3.39%	2.3	###	0.79	0.00	0.79	0
4.265	5606.55	11.2	0.610	11.2	4.1	1.56	4.05%	Slime Tailings	0.041	82.7	0.21	0.00	0.21	0	1.70	25.568	355.40	29.15	62	2.41%	2.4	###	0.80	0.00	0.80	0
4.429	5606.39	19.3	0.601	19.3	4.8	2.09	3.11%	Slime Tailings	0.041	82.7	0.21	0.00	0.21	0	1.70	32.810	456.06	38.17	89	3.14%	2.3	###	0.80	0.00	0.80	0
4.593	5606.23	24.6	0.687	24.6	4.0	1.73	2.80%	Sand-Slime Tailings	0.047	93.3	0.22	0.00	0.22	0	1.70	41.701	579.64	48.18	110	2.82%	2.2	###	0.83	0.00	0.83	0
4.757	5606.06	24.5	0.631	24.5	2.1	0.90	2.57%	Sand-Slime Tailings	0.047	93.3	0.23	0.00	0.23	0	1.70	41.684	579.64	48.18	106	2.60%	2.2	###	0.81	0.00	0.81	0
4.921	5605.90	23.4	0.399	23.4	5.1	2.21	1.71%	Sand-Slime Tailings	0.047	93.3	0.24	0.00	0.24	0	1.70	39.712	552.00	46.49	88	1.72%	2.1	###	0.82	0.00	0.82	0
5.085	5605.73	25.5	0.327	25.5	7.2	3.11	1.28%	Sand-Slime Tailings	0.047	93.3	0.24	0.00	0.24	0	1.70	43.262	601.62	50.36	103	1.29%	2.0	###	0.83	0.00	0.83	0
5.249	5605.57	20.3	0.101	20.3	1.4	0.80	1.53%	Sand-Slime Tailings	0.047	93.3	0.25	0.00	0.25	0	1.70	34.425	478.51	40.09	79	1.55%	2.1	###	0.84	0.00	0.84	0
5.413	5605.41	11.2	0.603	11.2	1.7	1.18	0.73%	Sand-Slime Tailings	0.047	93.3	0.26	0.00	0.26	0	1.70	19.402	264.66	22.12	42	2.41%	2.4	###	0.85	0.00	0.85	0
5.577	5605.24	7.5	0.441	7.5	0.67	0.27	1.88%	Slime Tailings	0.057	113.1	0.27	0.00	0.27	1	1.70	12.750	177.23	14.82	27	1.95%	2.5	###	0.85	0.00	0.85	0
5.741	5605.08	7.7	0.089	7.7	1.1	0.47	1.15%	Sand-Slime Tailings	0.059	119.0	0.28	0.01	0.27	1	1.70	13.090	181.95	15.22	27	1.20%	2.4	###	0.86	0.00	0.86	0
5.905	5604.91	9.9	0.084	9.9	2.9	1.27	0.84%	Sand-Slime Tailings	0.059	119.0	0.29	0.01	0.28	1	1.70	16.881	234.65	19.64	35	0.87%	2.2	###	0.87	0.00	0.87	0
6.069	5604.75	5.9	0.088	5.9	2.9	1.27	1.50%	Slime Tailings	0.057	113.1	0.30	0.02	0.28	1	1.70	9.962	138.47	11.21	20	1.58%	2.6	###	0.88	0.00	0.88	0
6.234	5604.59	5.6	0.085	5.6	4.4	1.92	1.53%	Slime Tailings	0.057	113.1	0.31	0.02	0.28	1	1.70	9.418	130.91	10.99	19	1.62%	2.6	###	0.89	0.00	0.89	0
6.398	5604.42	7.0	0.088	6.9	6.4	2.77	1.26%	Slime Tailings	0.057	113.1	0.32	0.03	0.29	1	1.70	11.798	163.91	13.78	23	1.32%	2.5	###	0.90	0.00	0.90	0
6.562	5604.26	10.7	0.083	10.7	12.0	16.7	0.60%	Slime Tailings	0.059	119.0	0.33	0.04	0.30	1	1.70	12.019	167.06	14.04	23	1.21%	2.4	###	0.91	0.00	0.91	0
6.726	5604.09	10.7	0.082	10.6	7.0	3.03	0.77%	Sand-Slime Tailings	0.059	119.0	0.33	0.04	0.30	1	1.70	18.098	251.42	20.99	35	0.79%	2.2	###	0.92	0.00	0.92	0
6.890	5603.93	13.4	0.114	13.4	5.9	2.54	0.85%	Sand-Slime Tailings	0.059	119.0	0.34	0.04	0.30	1	1.70	22.746	316.17	26.49	43	0.87%	2.2	###	0.93	0.00	0.93	0
7.054	5603.77	15.0	0.134	14.9	5.2	2.24	0.90%	Sand-Slime Tailings	0.059	119.0	0.35	0.05	0.31	1	1.70	25.364	352.56	29.52	48	0.92%	2.1	###	0.94	0.00	0.94	0
7.218	5603.60	22.4	0.135	22.4	8.0	3.48	0.60%	Sand-Slime Tailings	0.059	119.0	0.36	0.05	0.31	1	1.70	38.029	528.60	44.27	71	0.61%	1.9	###	0.95	0.00	0.95	0
7.382	5603.44	17.5	0.162	17.4	10.4	4.51	0.93%	Sand-Slime Tailings	0.059	119.0	0.37	0.06	0.32	1	1.70	29.580	411.16	34.48	54	0.95%	2.1	###	0.96	0.00	0.96	0
7.546	5603.27	15.5	0.200	15.4	24.5	10.65</																				

WHITE MEADOWS TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 3-2C									
Data File:	13-52106_SP3-2C-BSC-CPT	Idriss and Boulanger (2008)	5605.30	Water surface elevation during CPT investigation (ft)	5610.82	Ground Surface Elevation at (ft)			
Location:	White Mesa 2013 CPT Investigation	Max. Horiz. Acceleration, Amax(g)	0.15	5602.54	Water surface elevation at (ft) (tms)	5621.51	Ground Surface Elevation Impt (ft)		
U:\6.2.3 FieldData\2013 Field Investigation\Congress Data		Earthquake Moment Magnitude, M _w	5.5	5591.64	Water surface elevation at (ft) (tms)	0.50	Thickness of Erosion Protection		
		Magnitude Scaling Factor, MSF	1.69	5586.64	Water surface elevation at (ft) (tms)	3.50	Thickness of Water Storage		
Tailings Sand		Youd, et al (2001)							
Tailings Sand-Slimes		Max. Horiz. Acceleration, Amax(g)	0.15	1.44	Scaling Factor for stress ratio, σ_v	3.50	Thickness of High Compaction		
Tailings Slimes		Earthquake Moment Magnitude, M _w	5.5	0.47	Volumetric Strain Ratio for Site-Specific Design	1.19	Thickness of Random Platform		
Interim Cover		Magnitude Scaling Factor, MSF	2.21	7.51	Eqval. Number of Uniform Stress Cycles, N _e	1167.62	Additional Stress due to Final		
Cells Requiring User Input/Manipulation						5586.64	Elevation of bottom of tailings		

2013 CPT Data from ConTec										CPT Data Interpretations										Conditions at Pore										Liquification Triggering Analyses																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																													
Depth at time of CPT (t) (ft)	Elevation (t) (ft)	qt	fs	qc	Pw (kPa)	Pw (kPa)	fs/qc (%)	Material Type (as determined)	Unit Weight (pcf)	Stress at time of CPT (tsf)	Pore Pressure at time of CPT (tsf)	Stress at time of CPT (tsf)	Saturated at time of CPT 1=Yes 2=No	Normalized Normalized Penetration Resistance				Type Index, I _p	FC %	Total Stress at Pore Pressure				Saturated at 1=Yes 2=No	Idris & Boulanger (2008)										Youd et al. (2001)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																								
														CN	qc1	qc1	qc1N			Total Stress at t ₁ (tsf)	Pore Pressure at t ₁ (tsf)	Stress at t ₁ (tsf)	Saturated at t ₁ 1=Yes 2=No		Cyclic Stress Ratio				Cyclic Resistance Ratio				Cyclic Stress Ratio				Cyclic Resistance Ratio																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																						
														f _c	K ₁	K ₂	K ₃								CSR	Δq/c _v	q ₁ /c _v	q ₂ /c _v	q ₃ /c _v	q ₄ /c _v	f _c	D ₁	f _c	D ₁	f _c	D ₁	f _c	D ₁	f _c	D ₁	f _c	D ₁	f _c	D ₁																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
18.372	5592.45	20.9	0.383	20.4	78.0	33.1	1.83%	Sand-Silt	0.059	119.0	1.02	0.40	0.62	1	1.27	25.871	359.60	30.76	32	1.92%	2.5	###	1.61	0.00	1.61	0	0.89	0.06	0.96	1.0	0.049	41.09	71.85	0.102	2.06	0.93	0.32	0.80	0.80	1.07	1.0	0.039	2.64	81.26	0.130	4.38	3.22	2.5																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
18.537	5592.28	18.1	0.296	17.9	41.0	17.77	1.63%	Sand-Silt	0.059	119.0	1.03	0.41	0.63	1	1.27	22.684	315.30	28.72	32	1.73%	2.5	###	1.62	0.00	1.62	0	0.89	0.06	0.96	1.0	0.049	39.67	66.40	0.095	1.92	0.93	0.30	0.80	0.80	1.07	1.0	0.039	2.78	74.25	0.118	3.95	2.94	2.5																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
18.701	5592.12	21.8	0.347	21.4	62.7	27.18	1.78%	Sand-Silt	0.059	119.0	1.04	0.41	0.63	1	1.25	26.759	375.95	31.65	33	1.87%	2.5	###	1.63	0.00	1.63	0	0.89	0.06	0.96	1.0	0.049	40.47	73.05	0.103	2.10	0.93	0.32	0.80	0.80	1.06	1.0	0.039	2.56	81.00	0.129	4.30	3.20	2.5																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
18.865	5591.96	18.8	0.412	18.5	46.5	20.5	2.19%	Sand-Silt	0.059	119.0	1.05	0.42	0.64	1	1.25	23.212	322.65	27.38	28	2.32%	2.6	###	1.64	0.00	1.64	0	0.89	0.06	0.96	1.0	0.049	39.90	67.29	0.096	1.95	0.93	0.30	0.80	0.80	1.06	1.0	0.039	3.15	86.26	0.140	4.61	3.28	2.5																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
19.029	5591.79	18.5	0.428	18.2	2.62	9.62	2.31%	Sand-Silt	0.059	119.0	1.06	0.42	0.64	1	1.25	22.958	319.11	26.86	27	2.45%	2.6	###	1.65	0.00	1.65	0	0.88	0.06	0.96	1.0	0.049	39.72	66.59	0.095	1.94	0.93	0.30	0.80	0.80	1.06	1.0	0.039	3.28	82.21	0.144	4.72	3.33	2.5																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
19.193	5591.63	13.1	0.382	12.9	3.22	13.96	1.91%	Silt	0.057	113.1	1.07	0.43	0.64	1	1.25	16.221	225.48	19.13	19	3.17%	2.8	###	1.65	0.00	1.65	1	0.88	0.05	0.97	1.0	0.049	36.75	55.88	0.083	1.69	0.93	0.25	0.80	0.80	1.06	1.0	0.039	4.71	90.11	0.148	4.82	3.26	2.5																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
19.357	5591.46	11.8	0.318	11.1	110.7	47.96	2.70%	Silt	0.057	113.1	1.08	0.43	0.64	1	1.25	13.943	192.42	17.08	17	2.97%	2.8	###	1.66	0.01	1.66	1	0.88	0.05	0.97	1.0	0.049	36.04	53.12	0.081	1.63	0.93	0.24	0.80	0.80	1.06	1.0	0.039	4.94	84.32	0.136	4.38	3.01	2.5																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
19.521	5591.30	14.0	0.235	13.6	73.8	31.99	1.07%	Sand-Silt	0.059	119.0	1.09	0.44	0.66	1	1.24	16.857	234.31	20.20	20	1.81%	2.6	###	1.67	0.01	1.66	1	0.88	0.05	0.97	1.0	0.049	37.40	57.64	0.085	1.73	0.93	0.26	0.80	0.80	1.06	1.0	0.039	3.50	70.92	0.113	3.62	2.67	2.5																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
19.685	5591.14	14.0	0.240	13.3	116.1	52.92	1.72%	Sand-Silt	0.059	119.0	1.10	0.44	0.66	1	1.23	16.898	273.53	20.05	20	1.86%	2.6	###	1.68	0.02	1.67	1	0.88	0.05	0.97	1.0	0.050	37.33	57.38	0.085	1.72	0.93	0.26	0.80	0.80	1.06	1.0	0.039	3.57	71.65	0.114	3.62	2.67	2.5																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
19.850	5590.97	13.0	0.220	12.4	65.8	31.81	1.69%	Sand-Silt	0.059	119.0	1.11	0.45	0.67	1	1.22	15.191	211.09	18.54	18	1.85%	2.7	###	1.69	0.02	1.68	1	0.88	0.05	0.97	1.0	0.050	38.80	55.34	0.083	1.67	0.93	0.25	0.80	0.80	1.06	1.0	0.039	3.77	69.95	0.112	3.52	2.59	2.5																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
20.013	5590.81	12.6	0.337	11.7	147.5	63.92	2.68%	Silt	0.057	113.1	1.12	0.45	0.67	1	1.22	14.257	198.18	17.87	17	2.94%	2.8	###	1.70	0.03	1.68	1	0.88	0.05	0.97	1.0	0.050	36.31	54.17	0.082	1.64	0.92	0.24	0.80	0.80	1.06	1.0	0.039	4.79	85.49	0.138	4.31	2.98	2.5																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
20.177	5590.64	16.5	0.337	15.6	147.0	63.70	2.05%	Sand-Silt	0.059	119.0	1.13	0.46	0.67	1	1.21	18.838	261.85	23.17	23	2.20%	2.6	###	1.71	0.03	1.68	1	0.87	0.05	0.96	1.0	0.050	38.43	61.60	0.090	1.81	0.92	0.28	0.80	0.80	1.05	1.0	0.039	3.49	70.79	0.129	4.00	2.90	2.5																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
20.341	5590.48	20.1	0.337	19.5	94.3	40.85	1.68%	Sand-Silt	0.059	119.0	1.14	0.46	0.68	1	1.20	23.344	324.48	27.93	28	1.78%	2.5	###	1.72	0.04	1.69	1	0.87	0.06	0.96	1.0	0.050	40.10	68.03	0.097	1.96	0.92	0.31	0.80	0.80	1.05	1.0	0.040	2.77	77.23	0.123	3.77	2.87	2.5																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
24.180	5586.64							Sand-Silt	0.059	119.0																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	</

Extra layer added to analyze seismic settlement of tailings below the bottom of CPT investigation

Midpoint Depth, z , m	Shear Wave Velocity, V_s	Soil Density, ρ	Max Shear Strain, γ_{max}	$P = \frac{V_s}{V_{s(0.05)}}$	Plasticity Index, I_p	Shear Strain, γ	a	Threshold Shear Strain, γ_{th}	Volumetric Strain at 15 Cycles, ϵ_v	R	C_u	Volumetric Strain for Design Event, ϵ_v	Incremental Consolidation on (ft)				
0.08	508	1.7E-03	4.4E-02	3.0E-06	11	0.068	46690	0.00%	1.20	0.80	0.04	0.32	0.1333	0.778	0.00%	0.0000	
0.69	508	1.7E-03	4.3E-02	2.8E-05	11	0.118	18930	0.00%	2.00	0.65	0.03%	0.0000	0.34	0.079	0.765	0.00%	0.0000
1.75	508	1.9E-03	4.8E-02	6.5E-05	11	0.152	2657	0.01%	0.65	0.75	0.02%	0.0000	0.34	0.079	0.765	0.00%	0.0000
2.77	508	1.6E-03	4.0E-02	1.2E-04	11	0.170	10470	0.02%	2.00	0.65	0.03%	0.0000	0.34	0.079	0.765	0.00%	0.0000

Seismic Settlement Analysis - Stewart et al (2004)

TOTAL SEISMIC SETTLEMENT (FT)

0.397

Depth at z , m	Wave Velocity, V_s	Soil Density, ρ	Max Shear Strain, γ_{max}	$P = \frac{V_s}{V_{s(0.05)}}$	ty Index, I_p	Shear Strain, γ	a	b	γ Shear Strain, (%)	Cycles at 15	R	C_u	Strain for Design Event, ϵ_v	Incremental Consolidation on (ft)			
8.86	500	1.8E-03	4.6E-02	3.4E-04	10	0.229	6649	0.09%	2.00	0.65	0.03%	0.016	0.34	0.079	0.765	2.40%	0.0309
8.91	500	1.8E-03	4.6E-02	3.4E-04	10	0.229	6642	0.09%	2.00	0.65	0.03%	0.016	0.34	0.079	0.765	2.43%	0.0040
9.01	500	1.8E-03	4.6E-02	3.4E-04	10	0.230	6616	0.09%	2.00	0.65	0.03%	0.016	0.34	0.079	0.765	2.46%	0.0040
9.10	500	1.8E-03	4.6E-02	3.5E-04	10	0.230	6599	0.09%	2.00	0.65	0.03%	0.016	0.34	0.079	0.765	2.49%	0.0041
9.06	500	1.8E-03	4.6E-02	3.5E-04	10	0.231	6583	0.09%	2.00	0.65	0.03%	0.016	0.34	0.079	0.765	2.52%	0.0041
9.11	500	1.8E-03	4.4E-02	3.7E-04	10	0.482	5415	0.11%	2.00	0.65	0.03%	0.020	0.34	0.079	0.765	3.02%	0.0050
9.16	500	1.8E-03	4.4E-02	3.7E-04	10	0.482	5409	0.11%	2.00	0.65	0.03%	0.020	0.34	0.079	0.765	3.05%	0.0050
9.21	500	1.8E-03	4.6E-02	3.5E-04	10	0.231	6554	0.10%	2.00	0.65	0.03%	0.017	0.34	0.079	0.765	2.62%	0.0043
9.26	538	1.8E-03	5.3E-02	3.1E-04	10	0.231	6544	0.07%	2.00	0.65	0.03%	0.012	0.34	0.079	0.765	1.83%	0.0030
9.31	538	1.8E-03	5.3E-02	3.1E-04	10	0.232	6534	0.07%	2.00	0.65	0.03%	0.012	0.34	0.079	0.765	1.85%	0.0030
9.36	538	1.8E-03	5.3E-02	3.1E-04	10	0.483	5385	0.08%	2.00	0.65	0.03%	0.012	0.34	0.079	0.765	2.07%	0.0031
9.41	538	1.8E-03	5.3E-02	3.1E-04	10	0.232	6524	0.07%	2.00	0.65	0.03%	0.012	0.34	0.079	0.765	1.90%	0.0031
9.46	538	1.8E-03	5.3E-02	3.1E-04	10	0.232	6517	0.07%	2.00	0.65	0.03%	0.013	0.34	0.079	0.765	1.93%	0.0032
10.63	538	1.8E-03	5.3E-02	3.6E-04	10	0.238	6265	0.09%	2.00	0.65	0.03%	0.016	0.34	0.079	0.765	2.52%	0.0066

[illegible]

WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 3-3S

Data File: 13-52106_SP3-3S-BSC-CPT		Idriss and Boulanger (2008)		5605.60	Water surface elevation during CPT investigation (ft)		5609.63	Ground Surface Elevation at time of CPT (ft amsl)		
Location: White Mesa 2013 CPT Investigation		Max. Horiz. Acceleration, A _{max} :		0.15	5601.35	Water surface elevation at t ₀ (ft amsl)		5620.49	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	
1.1.6.2.3 Field Data/2013 Field Investigation/Conotec Data		Earthquake Moment Magnitude, M _w :		5.5	5582.14	Water surface elevation at t ₁ (ft amsl)		0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement of Final Cover (ft)	
Tailings Sands		Magnitude Scaling Factor, MSF:		1.69	5577.14	Water surface elevation at t ₂ (ft amsl)		3.50	Thickness of Water Storage/Rooting Zone (ft)	
Tailings Sand-Slimes		Youd, et al (2001)						3.50	Thickness of High Compaction Layer (ft)	
Tailings Slimes		Max. Horiz. Acceleration, A _{max} :		0.15	1.44	Scaling Factor for stress ratio, r _{sc}		3.36	Thickness of Random/Platform Fill on on top of existing interim cover (ft)	
Interim Cover		Earthquake Moment Magnitude, M _w :		5.5	0.47	Volumetric Strain Ratio for Site-Specific Design Earthquake		1184.24	Additional Stress due to Final Cover Placement, Δσ _{FC} (psf)	
Cells Requiring User Input/Manipulation		Magnitude Scaling Factor, MSF:		2.21	7.51	Equiv. Number of Uniform Strain Cycles, N		5577.14	Elevation of bottom of tailings (liner) (ft amsl)	

FINAL COVER		Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer 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(ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer (ft)	Layer 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2013 CPT Data from ConeTec										CPT Data Interpretations										Conditions at t ₁																			
Depth at time of CPT (ft)	Elevation (ft amsl)	qt	tsf	qc	Pw (u2)	PSI	ts/ft (%)	Material Type (as determined)	Unit Weight (pcf)	Unit Weight of CPT (pcf)	Stress at time of CPT (tsf)	Pore Pressure at time of CPT (tsf)	Stress at time of CPT (tsf)	Saturated at time of CPT 1=Yes 0=No	CN	qc1 TSF	qc1 MPa	qc1N	Normalized Cone Penetration Ratio, R _q	Type Index, I _c	FC %	Total Stress at t ₁	Pore Pressure at t ₁	Effective Stress at t ₁	Saturated at t ₁ 1=Yes 0=No	Idriss & Boulanger (2008)													
																														Cyclic Stress Ratio									
																														Cyclic Resistance Ratio									
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WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 3-AN

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White Mesa 2013 CPT Investigation

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White Mesa 2013 CPT Investigation

13-52106_SP3-AN-SSC-CPT

13-52106_SP3-AN-SSC-CPT

Depth at z1, z2 (m)	Midpoint Depth at z1, z2 (m)	Shear Wave Velocity, Vs (m/sec)	Soil Density (kg/m3)	Max Shear Strain Modulus, Gmax (GPa)	P = Ymax(GPa) (GPa)	Plasticity Index, PI	g		Shear Strain, γ (%)	Shear Strain, γ (%)	b	Threshold d Shear Strain, γb	Volumetric strain at 15 Cycles, εv15 (%)	R	c	Cv	Volumetric Strain for Design Event, εv (%)	Incremental I Consolidation on (ft)
							g1	g2										
0.04	0.75	508	1.6E-03	4.0E-02	5.0E-06	11	0.068	46966	0.002	1.20	0.80	0.04%	0.000	0.32	0.133	0.778	0.000	0.0000
0.121	0.69	508	1.7E-03	4.3E-02	2.8E-05	11	0.118	126930	0.001	0.65	0.75	0.02%	0.000	0.34	0.079	0.765	0.000	0.0000
0.20	1.05	508	1.6E-03	4.8E-02	6.5E-05	11	0.152	189571	0.001	0.65	0.75	0.02%	0.000	0.34	0.079	0.765	0.000	0.0000
0.304	3.38	508	1.6E-03	4.0E-02	1.5E-04	11	0.178	97115	0.02%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.000	0.0000
Seismic Settlement Analysis - Stewart et al (2004)																		
TOTAL SEISMIC SETTLEMENT (FT.)																		
0.623																		
Depth at z1, z2 (m)	Wave Velocity, Vs (ft/sec)	Soil Density (pcf)	Max Shear Strain Modulus, Gmax (tsf)	P = Ymax(GPa) (tsf)	Plasticity Index, PI	g1	g2	Shear Strain, γ (%)	a	b	Threshold d Shear Strain, γb (%)	Volumetric strain at 15 Cycles, εv15 (%)	R	c	Cv	Strain for Design Event, εv (%)	Incremental I Consolidation on (ft)	
4.52	594	1.6E-03	5.5E-02	1.4E-04	11	0.191	8685	0.02%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000	
4.57	594	1.6E-03	5.5E-02	1.4E-04	11	0.192	8648	0.02%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000	
4.62	594	1.6E-03	5.5E-02	1.4E-04	11	0.192	8611	0.02%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000	
4.67	594	1.6E-03	5.5E-02	1.4E-04	11	0.193	8575	0.02%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000	
4.72	594	1.6E-03	5.5E-02	1.5E-04	11	0.193	8539	0.02%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000	
4.77	594	1.6E-03	5.5E-02	1.5E-04	11	0.194	8504	0.02%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000	
4.82	594	1.6E-03	5.5E-02	1.5E-04	11	0.194	8469	0.02%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000	
4.87	594	1.6E-03	5.5E-02	1.5E-04	11	0.195	8435	0.02%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000	
4.92	594	1.6E-03	5.5E-02	1.5E-04	11	0.195	8401	0.02%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000	
4.97	594	1.6E-03	5.5E-02	1.5E-04	11	0.196	8367	0.02%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000	
5.02	594	1.6E-03	5.5E-02	1.5E-04	11	0.196	8334	0.02%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000	
5.07	594	1.6E-03	5.5E-02	1.6E-04	11	0.197	8302	0.02%	2.00	0.65	0.03%	0.000	0.34	0.079	0.765	0.00%	0.0000	
5.12	594	1.6E-03	5.5E-02</															

[illegible]

Extra layer added to analyze seismic settlement of tailings below the bottom of CPT investigation

File Name: 13-52162-SP5-6N-BSC-CPT

Location: White Mesa Final CPT Investigation

13-52162-SP5-6N-BSC-CPT

13-52162-SP5-6N-BSC-CPT

13-52162-SP5-6N-BSC-CPT

13-52162-SP5-6N-BSC-CPT

13-52162-SP5-6N-BSC-CPT

13-52162-SP5-6N-BSC-CPT

13-52162-SP5-6N-BSC-CPT

WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 3-6N

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Ground Surface Elevation at time of CPT (ft (m))

Ground Surface Elevation immediately after Placement of Final Cover (ft (m))

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Ground

WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 3-6N																																							
Data File: 13-52106_SP3-6N-BSC-CPT										Idriss and Boulanger (2008)										Elev. at Top of Layer (ft)										Elev. at Bottom of Layer (ft)									
Location: White Mesa 2013 CPT Investigation										Max. Horiz. Acceleration, A _{max} : 0.15										5604.20										5599.16									
\\A.V.6.2.3_Field Data\2013 Field Investigation\Consect Data										Earthquake Moment Magnitude, M: 5.5										5590.44										5585.44									
Tailings Sands										Youd, et al (2001)										3.50										1.44									
Tailings Sand-Slimes										Max. Horiz. Acceleration, A _{max} : 0.15										1.44										0.47									
Tailings Slimes										Earthquake Moment Magnitude, M: 5.5										0.47										7.51									
Interim Cover										Magnitude Scaling Factor, MSF: 2.21										7.51										7.51									
Cells Requiring User Input/Manipulation										Magnitude Scaling Factor, MSF: 2.21										7.51										7.51									
2013 CPT Data from ConeTec										CPT Data Interpretations										Conditions at t ₁										Conditions at t ₂									
Depth at time of CPT (ft)	Elevation (ft amsl)	qt (TSF)	fs (TSF)	qc (TSF)	Pw (u2) (ft)	Pw (u2) (PSI)	fs/qt (%)	Material Type (as determined)	Unit Weight (pcf)	Unit Weight at time of CPT (pcf)	Stress at time of CPT (tsf)	Pore Pressure at time of CPT (tsf)	Stress at time of CPT (tsf)	Saturated at time of CPT 1=Yes 0=No	CN	qc1 TSF	qc1 MPa	qc1N	Normalized Cone Penetration Resistance, Q _n	Normalized Friction Ratio, f _n (%)	Type Index, I _c	FC %	Total Stress at t ₁ (tsf)	Pore Pressure at t ₁ (tsf)	Effective Stress at t ₁ (tsf)	Saturated at t ₁ 1=Yes 0=No	Liquefaction Triggering Analyses												
																											Cyclic Stress Ratio					Cyclic Resistance Ratio					Cyclic Stress Ratio		
f _o	D _r	f _o	D _r	f _o	D _r	f _o	D _r	f _o	D _r	f _o	D _r	f _o	D _r	f _o	D _r	f _o	D _r	f _o	D _r	f _o	D _r	f _o	D _r	f _o	D _r	f _o	D _r	f _o	D _r	f _o	D _r	f _o	D _r	f _o	D _r				
K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}	K _{cs}				
Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅	Δqc ₁₅				
FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS	FoS				
Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS	Avg FoS				
Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No	Liquefiable? 1=Yes 2=No					
g ₁	g ₂	g ₁	g ₂	g ₁	g ₂	g ₁	g ₂	g ₁	g ₂	g ₁	g ₂	g ₁	g ₂	g ₁	g ₂	g ₁	g ₂	g ₁	g ₂	g ₁	g ₂	g ₁	g ₂	g ₁	g ₂	g ₁	g ₂	g ₁	g ₂	g ₁	g ₂	g ₁	g ₂	g ₁	g ₂				
γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ	γ				
a	b	a	b	a	b	a	b	a	b	a	b	a	b	a	b	a	b	a	b	a	b	a	b	a	b	a	b	a	b	a	b	a	b	a	b				
Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)	Threshold Shear Strain, γ _h (%)						
Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)	Volumetric Strain at 15 Cycles, ε _{v-15} (%)							
R	c	R	c	R	c	R	c	R	c	R	c	R	c	R	c	R	c	R	c	R	c	R	c	R	c	R	c	R	c	R	c	R	c	R	c				
C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u	C _u						
Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)	Strain for Design Event, ε _d (%)						
Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)	Incremental Consolidation (on ft)					

Extra layer added to analyze seismic settlement of tailings below the bottom of CPT investigation.

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Extra layer added to analyze seismic settlement of tailings below the bottom of CPT investigation

WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 3-88

Data File: 13-52106_SPS-88-88C-CPT

Location: 13-52106_SPS-88-88C-CPT

13-52106_SPS-88-88C-CPT

Drives and Bouloger (2008)

White Mesa 2013 CPT Investigation

Earthquake Moment Magnitude, M_w: 5.5

Magnitude Scaling Factor, MSF: 1.69

Youd, et al (2001)

Max Horiz. Acceleration, A_{max}: 0.15

Earthquake Moment Magnitude, M_w: 5.5

Magnitude Scaling Factor, MSF: 2.21

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5600.91

5600.92

5600.93

5600.94

5600.95

5600.96

5600.97

5600.98

5600.99

5601.00

Extra layer added to analyze seismic settlement of tailings below the bottom of CPT investigation

ATTACHMENT F.4
LIQUEFACTION CALCULATIONS

Notes

t_0 corresponds to beginning of final cover placement
 t_1 corresponds to dewatering of the tailings to a level 5 feet above the liner
 t_2 corresponds to completion of dewatering

Assumes 99% of consolidation due to existing stress conditions has taken place

SOIL PROPERTIES		
TAILINGS		
Specific Gravity, G_s		
2.70	Specific gravity of tailing sands, $G_{s-TS\text{and}}$	Based on testing performed on other uranium tailings and presented in Keshian and Rager (1988)
2.80	Specific gravity of tailing sand-slimes, G_{s-TS-S}	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015b)
2.86	Specific gravity of tailings slimes, $G_{s-TS\text{lime}}$	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015b)
Fines Content		
18%	Fines content of tailings sands (%)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015b)
47%	Fines content of tailings sand-slimes (%)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015b)
71%	Fines content of tailings slimes (%)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015b)
Dry Unit Weight, γ_d		
97	In-situ dry unit weight of tailings sands at t_0 , $\gamma_{d0-TS\text{and}}$ (pcf)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015b)
88	In-situ dry unit weight of tailings sand-slimes at t_0 , $\gamma_{d0-TS-S}$ (pcf)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015b)
78	In-situ dry unit weight of tailings slimes at t_0 , $\gamma_{d0-TS\text{lime}}$ (pcf)	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015b)
Saturated Unit Weight, γ_{sat}		
123	In-situ saturated unit weight of tailings sands at t_0 , $\gamma_{sat0-TS\text{and}}$ (pcf)	Calculated
119	In-situ saturated unit weight of tailings sand-slimes at t_0 , $\gamma_{sat0-TS-S}$ (pcf)	Calculated
113	In-situ saturated unit weight of tailings slimes at t_0 , $\gamma_{sat0-TS\text{lime}}$ (pcf)	Calculated
Moist Unit Weight, γ_m		
103	Moist unit weight of tailings sands, $\gamma_{m-TS\text{and}}$ (pcf)	Calculated, assuming long-term water content from laboratory testing (Tailings Data Analysis Report. MWH, 2015b)
93	Moist unit weight of tailings sand-slimes, γ_{m-TS-S} (pcf)	Calculated, assuming long-term water content from laboratory testing (Tailings Data Analysis Report. MWH, 2015b)
83	Moist unit weight of tailings slimes, $\gamma_{m-TS\text{lime}}$ (pcf)	Calculated, assuming long-term water content from laboratory testing (Tailings Data Analysis Report. MWH, 2015b)
Void Ratio, e		
0.74	Void ratio of tailing sands at t_0 , $e_{0-TS\text{and}}$	Calculated
0.99	Void ratio of tailing sand-slimes at t_0 , e_{0-TS-S}	Calculated
1.29	Void ratio of tailing slimes at t_0 , $e_{0-TS\text{lime}}$	Calculated
Saturated Water Content, w_{sat}		
27%	Saturated water content of tailings sands at t_0 , $w_{sat0-TS\text{and}}$ (%)	Calculated
35%	Saturated water content of tailings sand-slimes at t_0 , $w_{sat0-TS-S}$ (%)	Calculated
45%	Saturated water content of tailings slimes at t_0 , $w_{sat0-TS\text{lime}}$ (%)	Calculated
Water Content of Moist Tailings, w_{w-T}		
6%	Water content of moist tailings sands, $w_{m-TS\text{and}}$ (%)	From Attachment H - Radon Emanation Modeling including with this submittal
6%	Water content of moist tailings sand-slimes, w_{m-TS-S} (%)	From Attachment H - Radon Emanation Modeling including with this submittal
6%	Water content of moist tailings slimes, $w_{m-TS\text{lime}}$ (%)	From Attachment H - Radon Emanation Modeling including with this submittal
Plasticity Index, PI		
0	Plasticity index of tailings sands, $PI_{TS\text{and}}$	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015b)
10	Plasticity index of tailings sand-slimes, PI_{TS-S}	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015b)
16	Plasticity index of tailings slimes, $PI_{TS\text{lime}}$	Average value from lab testing of samples obtained on-site (Tailings Data Analysis Report. MWH, 2015b)
Seismic Settlement Coefficients		
2.2	Coefficient "a" of Unsaturated Sand Tailings	From Stewart, et al (2004), page 86, Figure 6.5
5.0	Coefficient "a" of Saturated Sand Tailings	From Stewart, et al (2004), page 86, Figure 6.5
2.0	Coefficient "a" of Sand-Slime Tailings	From Stewart, et al (2004), page 89, Figure 6.7
2.0	Coefficient "a" of Slime Tailings	From Stewart, et al (2004), page 89, Figure 6.7
1.00	Coefficient "b" of Sand Tailings	From Stewart, et al (2004), page 86, Figure 6.5
0.65	Coefficient "b" of Sand-Slime Tailings	From Stewart, et al (2004), page 89, Figure 6.7
0.65	Coefficient "b" of Slime Tailings	From Stewart, et al (2004), page 89, Figure 6.7
0.01%	Strain threshold value of Sand Tailings, γ_{tv}	From Stewart, et al (2004), page 86, Figure 6.5
0.03%	Strain threshold value of Sand-Slime Tailings, γ_{tv}	From Stewart, et al (2004), page 89, Figure 6.7
0.03%	Strain threshold value of Slime Tailings, γ_{tv}	From Stewart, et al (2004), page 89, Figure 6.7
0.36	Coefficient "R" of Sand Tailings	From Stewart, et al (2004), page 86, for soils with non-plastic fines
0.34	Coefficient "R" of Sand-Slime Tailings	From Stewart, et al (2004), page 89, for soils with medium plasticity fines
0.34	Coefficient "R" of Slime Tailings	From Stewart, et al (2004), page 89, for soils with medium plasticity fines

Other

5.0	Height of water table above liner at t_1 , H_{sat-1} (ft)
0.0	Height of water table above liner at t_2 , H_{sat-2} (ft)
6.0%	Long-term moisture content of tailings, $w_{tailings}$ (%)
508	Shear Wave Velocity of Tailings, V_s (ft/sec)

Assumed for end of active maintenance

From Attachment H - Radon Emanation Modeling including with this submittal
Conservatively assumed to be the average of the shear wave velocities measured in Cell 2 tailings

COVER SOIL

Specific Gravity, G_s

2.61	Specific gravity of topsoil, $G_{s-topsoil}$
2.62	Specific gravity of rock mulch, $G_{s-mulch}$
2.63	Specific gravity of cover soil, $G_{s-cover}$

From Attachment H - Radon Emanation Modeling including with this submittal
From Attachment H - Radon Emanation Modeling including with this submittal
From Attachment H - Radon Emanation Modeling including with this submittal

Unit Weight, γ

118.0	Maximum dry unit weight of cover soil $\gamma_{cover-max}$ (pcf)
100.7	Moist unit weight of cover soil at 80% relative compaction, $\gamma_{cover80}$ (pcf)
107.0	Moist unit weight of cover soil at 85% relative compaction, $\gamma_{cover85}$ (pcf)
119.6	Moist unit weight of cover soil at 95% relative compaction, $\gamma_{cover95}$ (pcf)
100	Dry unit weight of topsoil layer at 85% relative compaction, $\gamma_{topsoil85}$ (pcf)
105	Moist unit weight of topsoil layer at 85% relative compaction, $\gamma_{topsoil85}$ (pcf)
106	Dry unit weight of rock mulch layer at 85% relative compaction, $\gamma_{mulch85}$ (pcf)
110	Moist unit weight of rock mulch layer at 85% relative compaction, $\gamma_{mulch85}$ (pcf)

Average calculated from laboratory testing results (UWM, 2012)
Calculated
Calculated
Calculated
From Attachment H - Radon Emanation Modeling including with this submittal
Calculated
Calculated
From Attachment H - Radon Emanation Modeling including with this submittal

Void Ratio, e

0.74	Void Ratio of cover soil at 80% relative compaction, $e_{cover80}$
0.64	Void Ratio of cover soil at 85% relative compaction, $e_{cover85}$
0.46	Void Ratio of cover soil at 95% relative compaction, $e_{cover95}$
0.61	Void Ratio of topsoil at 85% relative compaction, $e_{topsoil85}$
0.54	Void Ratio of rock mulch at 85% relative compaction, $e_{mulch85}$

Calculated
Calculated
Calculated
Calculated from porosity presented in Attachment H - Radon Emanation Modeling including with this submittal
Calculated from porosity presented in Attachment H - Radon Emanation Modeling including with this submittal

Seismic Settlement Coefficients

1.2	Coefficient "a" of Erosion Protection/Topsoil Cover
2.0	Coefficient "a" of General Cover Soil
0.65	Coefficient "a" of High-Compaction Layer
0.80	Coefficient "b" of Erosion Protection/Topsoil Cover
0.65	Coefficient "b" of General Cover Soil
0.75	Coefficient "b" of High-Compaction Layer
0.04%	Strain threshold value of Erosion Protection/Topsoil Cover, γ_{tv}
0.03%	Strain threshold value of General Cover Soil, γ_{tv}
0.02%	Strain threshold value of High-Compaction Layer, γ_{tv}
0.32	Coefficient "R" of Erosion Protection/Topsoil Cover
0.34	Coefficient "R" of General Cover Soil
0.34	Coefficient "R" of High-Compaction Layer

From Stewart, et al (2004), page 88, Figure 6.6
From Stewart, et al (2004), page 89, Figure 6.7
From Stewart, et al (2004), page 89, Figure 6.7
From Stewart, et al (2004), page 88, Figure 6.6
From Stewart, et al (2004), page 89, Figure 6.7
From Stewart, et al (2004), page 89, Figure 6.7
From Stewart, et al (2004), page 88, Figure 6.6
From Stewart, et al (2004), page 89, Figure 6.7
From Stewart, et al (2004), page 89, Figure 6.7
From Stewart, et al (2004), page 88, for soils with low plasticity fines
From Stewart, et al (2004), page 89, for soils with medium plasticity fines
From Stewart, et al (2004), page 89, for soils with medium plasticity fines

Other

6.7%	Long-term moisture content of cover soil, w_{cover} (%)
5.2%	Long-term moisture content of topsoil, $w_{topsoil}$ (%)
4.0%	Long-term moisture content of rock mulch, $w_{rockmulch}$ (%)
0.14	Compression index of cover soil, $C_{c-cover}$
51%	Fines content of cover soil (%)
11	Plasticity Index of cover soil, PI
508	Shear Wave Velocity of Cover Soil, V_s (ft/sec)

Estimated based on measured 15bar water content. (UWM, 2012)
From Attachment H - Radon Emanation Modeling including with this submittal
From Attachment H - Radon Emanation Modeling including with this submittal
Calculated from empirical equation presented in Holtz and Kovacs, 1981. Page 341. $C_c = 0.30*(e_0 - 0.27)$
Mean value from laboratory analyses presented in previous response to interrogatories (EFRI, 2012)
Weighted Average from 2010 and 2012 laboratory testing (laboratory results presented in EFRI, 2012)
Conservatively assumed to be the average of the shear wave velocities measured in Cell 2 tailings

SEISMIC PARAMETERS

0.15	Maximum horizontal acceleration at the ground surface, $a_{max/g}$
5.5	Magnitude of Design Event, M
20	Site-Source Distance, r (km)
1.00	Stress reduction factor, r_d
7.51	Equiv. Number of Uniform Strain Cycles, N
594	Average shear wave velocity for cover, V_s (ft/s)
495	Average shear wave velocity for tailings (3' - 9.4'), V_s (ft/s)
460	Average shear wave velocity for tailings (9.4' - 14.4'), V_s (ft/s)
500	Average shear wave velocity for tailings (14.4' - 19.6'), V_s (ft/s)
538	Average shear wave velocity for tailings (19.6' - 24.7'), V_s (ft/s)
594	Average shear wave velocity for tailings (24.7' - liner), V_s (ft/s)

From Probabilistic Seismic Hazard Analysis (MWH, 2015a)
From Probabilistic Seismic Hazard Analysis (MWH, 2015a)
From Probabilistic Seismic Hazard Analysis (MWH, 2015a)
Conservatively assumed.
Calculated from Stewart, et al (2004), Equation 6.11, page 79. S parameter =0 since shallow soil and rock underlie the tailings (<20m) below tailings
Conservatively estimated as upper bound average V_s for tailings in Cell 2 in October 2013 (Tailings Data Analysis Report. MWH, 2015b)
Conservatively estimated as average V_s over depth range for tailings in Cell 2 in October 2013 (Tailings Data Analysis Report. MWH, 2015b)
Conservatively estimated as average V_s over depth range for tailings in Cell 2 in October 2013 (Tailings Data Analysis Report. MWH, 2015b)
Conservatively estimated as average V_s over depth range for tailings in Cell 2 in October 2013 (Tailings Data Analysis Report. MWH, 2015b)
Conservatively estimated as average V_s over depth range for tailings in Cell 2 in October 2013 (Tailings Data Analysis Report. MWH, 2015b)
Conservatively estimated as average V_s over depth range for tailings in Cell 2 in October 2013 (Tailings Data Analysis Report. MWH, 2015b)
Conservatively estimated as average V_s over depth range for tailings in Cell 2 in October 2013 (Tailings Data Analysis Report. MWH, 2015b)

MISCELLANEOUS PARAMETERS

62.4	Unit Weight of Water, γ_w
82.4	Atmospheric Pressure, P_a (kPa)
1722.0	Atmospheric Pressure, P_a (psf)

Calculated assuming elev=5600' amsl. http://www.engineeringtoolbox.com/air-altitude-pressure-d_462.html
Unit conversion calculation

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WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 2W2																									Elev. at Top of Layer (ft)		Elev. At Midpoint of Layer (ft)		Bottom of Layer (ft)		Thickness s of Layer (ft)		Unit Weight t (pcf)		Unit Weight (pcf)		Stress at Bottom of Layer (tsf)		Stress at Midpoint of Layer (tsf)		Pressure at Bottom of Layer (tsf)		Equip Pore Pressure at Midpoint of Layer (tsf)		Stress at Bottom of Layer (tsf)		Stress at Midpoint of Layer (tsf)																																																
Data File: 13-52106_SP2W2-BSC-CPT										Idriss and Boulanger (2008)										5613.10 Water surface elevation during CPT investigation (ft)										5615.85 Ground Surface Elevation at time of CPT (ft amsl)																																																																	
Location: White Mesa 2013 CPT Investigation										Max. Horiz. Acceleration, Amax/g: 0.15										5607.57 Water surface elevation at t0 (ft amsl)										5625.87 Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)																																																																	
A.A.16.2.3 Field Data/2013 Field Investigation/Conotec Data										Earthquake Moment Magnitude, M: 5.5										5598.51 Water surface elevation at t1 (ft amsl)										0.50 Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement of Final Cover																																																																	
Tailings Sands										Magnitude Scaling Factor, MSF: 1.69										5593.51 Water surface elevation at t2 (ft amsl)										3.50 Thickness of Water Storage/Rooting Zone (ft)																																																																	
Tailings Sand-Slimes										Youd, et al (2001)										4.00 Thickness of High Compaction Layer (ft)										2.02 Thickness of Random/Platform Fill on top of existing interim cover (ft)																																																																	
Tailings Slimes										Max. Horiz. Acceleration, Amax/g: 0.15										1.44 Scaling Factor for stress ratio, r_m										1111.60 Volumetric Strain Ratio for Site-Specific Design Earthquake, ΔσFC (psf)																																																																	
Interim Cover										Earthquake Moment Magnitude, M: 5.5										0.47 Equiv. Number of Uniform Strain Cycles, N										5593.51 Elevation of bottom of tailings (liner) (ft amsl)																																																																	
Cells Requiring User Input/Manipulation										Magnitude Scaling Factor, MSF: 2.21																																																																																					
2013 CPT Data from ConeTec										Material Type (as determined by CPT)										CPT Data Interpretations										Conditions at t1										Liquefaction Triggering Analyses										Idriss & Boulanger (2008)																																													
Depth at time of CPT (ft)		Elevation (ft amsl)		qt		fs		qc		Pw (u2) (ft)		Pw (u2) (PSI)		fs/qt (%)		Unit Weight (pcf)		Unit Weight of CPT (pcf)		Total Stress at time of CPT (tsf)		Effective Stress at time of CPT (tsf)		Saturated at time of CPT 1=Yes 0=No		CN		qc1		qc1		qc1N		Normalized Cone Penetration Resistance, q_c		Normalized d Friction Ratio, F_r (%)		Type Index, I_c		FC %		Total Stress at t1 (tsf)		Pore Pressure at t1 (tsf)		Effective Stress at t1 (tsf)		Saturated at t1 1=Yes 0=No		Cyclic Stress Ratio		Cyclic Resistance Ratio (CRR)		FoS		r_d		D_r		f		K_c		K_s		CSR M=7.5, s/v=1atm		Δq_c1n		q_c1n-cs		M=7.5, s/v=1atm		FoS		K_c		q_c1n-cs		(CRR)		FoS		Avg FoS		Liquefiable? 1=Yes 2=No		CN		qc1		qc1		qc1N	
0.164	5615.69	19.0	0.292	19.0	2.8	1.22	1.53%	Interim Cover	0.050	100.7	0.01	0.00	0.01	0	1.70	32.317	449.21	37.57	2302	1.54%	1.4	51%	0.56	0.00	0.56	0	1.00	0.06	1.03	1.0	0.059	43.50	81.07	0.114	1.92	0.98	0.35	0.80	2.53	1.0	0.017	1.00	37.57	0.081	196.84	99.38	2	1.7	32.347	3.0969	37.569																																												
0.328	5615.52	27.6	0.767	27.6	3.0	1.32	2.78%	Interim Cover	0.050	100.7	0.02	0.00	0.02	0	1.70	46.937	652.42	54.55	1671	2.78%	1.7	51%	0.57	0.00	0.57	0	1.00	0.07	1.03	1.0	0.060	49.46	104.02	0.149	2.51	0.98	0.43	0.79	2.32	1.0	0.019	1.03	55.95	0.096	116.62	59.56	2	1.7	46.969	4.4968	54.552																																												
0.492	5615.36	63.0	1.250	63.0	2.6	1.13	1.98%	Interim Cover	0.050	100.7	0.02	0.00	0.02	0	1.70	107.100	#####	124.42	2542	1.98%	1.5	51%	0.58	0.00	0.58	0	1.00	0.13	1.05	1.0	0.061	73.98	198.41	1.000	16.46	0.98	0.64	0.68	3.13	1.0	0.014	1.00	124.42	0.259	209.31	112.89	2	1.7	107.13	10.256	124.422																																												
0.656	5615.19	130.6	1.407	130.6	1.2	0.53	1.08%	Interim Cover	0.050	100.7	0.03	0.00	0.03	0	1.70	221.952	#####	257.80	3950	1.08%	1.3	51%	0.59	0.00	0.59	0	1.00	0.30	1.10	1.0	0.064	120.79	378.59	1.000	15.73	0.98	0.93	0.60	3.68	1.0	0.012	1.00	257.80	1.000	606.04	310.88	2	1.7	221.97	21.251	257.799																																												
0.820	5615.03	202.3	0.922	202.3	2.2	0.96	0.46%	Interim Cover	0.050	100.7	0.04	0.00	0.04	0	1.70	343.859	#####	399.40	4896	0.46%	0.9	51%	0.60	0.00	0.60	0	1.00	0.30	1.10	1.0	0.064	170.48	569.88	1.000	15.73	0.97	1.15	0.60	3.37	1.0	0.013	1.00	399.40	1.000	485.02	250.37	2	1.7	343.88	32.923	399.399																																												
0.984	5614.87	189.1	1.391	189.0	4.1	1.77	0.74%	Interim Cover	0.050	100.7	0.05	0.00	0.05	0	1.70	321.351	#####	373.28	3813	0.74%	1.1	51%	0.61	0.00	0.61	0	1.00	0.30	1.10	1.0	0.064	161.32	534.60	1.000	15.73	0.97	1.12	0.60	3.13	1.0	0.014	1.00	373.28	1.000	404.34	210.03	2	1.7	321.39	30.77	373.280																																												
1.148	5614.70	207.8	1.514	207.8	0.1	0.04	0.73%	Interim Cover	0.050	100.7	0.06	0.00	0.06	0	1.70	353.311	#####	410.35	3593	0.73%	1.1	51%	0.61	0.00	0.61	0	1.00	0.30	1.10	1.0	0.064	174.33	584.68	1.000	15.73	0.97	1.17	0.60	2.95	1.0	0.015	1.00	410.35	1.000	346.72	181.22	2	1.7	353.31	33.826	410.351																																												
1.312	5614.54	81.3	1.745	81.3	0.7	0.29	2.15%	Interim Cover	0.050	100.7	0.07	0.00	0.07	0	1.70	138.142	#####	160.45	1229	2.15%	1.6	51%	0.62	0.00	0.62	0	1.00	0.18	1.06	1.0	0.061	86.63	247.08	1.000	16.36	0.97	0.73	0.63	2.56	1.0	0.017	1.00	160.45	1.000	303.50	159.93	2	1.7	138.15	13.226	160.452																																												
1.476	5614.37	52.5	1.382	52.5	-0.3	-0.14	2.63%	Interim Cover	0.050	100.7	0.07	0.00	0.07	0	1.70	89.284	#####	103.69	705	2.64%	1.8	51%	0.63	0.00	0.63	0	1.00	0.11	1.03	1.0	0.060	66.71	170.40	0.412	6.88	0.97	0.59	0.71	2.05	1.0	0.021	1.07	111.44	0.209	56.33	31.61	2	1.7	89.281	8.5477	103.694																																												
1.640	5614.21	40.7	1.041	40.7	0.1	0.02	2.56%	Interim Cover	0.050	100.7	0.08	0.00	0.08	0	1.70	69.241	962.45	80.42	492	2.56%	1.8	51%	0.64	0.00	0.64	0	1.00	0.09	1.03	1.0	0.059	58.54	138.96	0.229	3.86	0.97	0.52	0.74	1.83	1.0	0.023	1.11	89.28	0.146	35.52	19.69	2	1.7	69.242	6.6292	80.420																																												
1.804	5614.05	34.3	0.916	34.3	-0.7	-0.29	2.67%	Interim Cover	0.050	100.7	0.09	0.00	0.09	0	1.70	58.310	810.51	67.72	376	2.68%	1.9	51%	0.65	0.00	0.65	0	1.00	0.08	1.02	1.0	0.059	54.08	121.80	0.183	3.10	0.97	0.48	0.76	1.71	1.0	0.025	1.17	78.96	0.126	27.80	15.45	2	1.7	58.303	5.5819	67.715																																												
1.968	5613.88	64.5	1.005	64.5	0.8	0.33	1.56%	Interim Cover	0.050	100.7	0.10	0.00	0.10	0	1.70	109.582	#####	127.28	649	1.56%	1.6	51%	0.65	0.00	0.65	0	1.00	0.13	1.04	1.0	0.060	74.99	202.27	1.000	16.71	0.97	0.65	0.67	2.02	1.0	0.021	1.00	127.28	0.272	55.07	35.89	2	1.7	109.59	10.492	127.282																																												
2.133	5613.72	88.7	1.082	88.7	0.0	0.00	1.22%	Interim Cover	0.050	100.7	0.11	0.00	0.11	0	1.70	150.858	#####	175.21	825	1.22%	1.4	51%	0.66	0.00	0.66	0	1.00	0.20	1.05	1.0	0.061	91.81	267.02	1.000	16.46	0.97	0.76	0.62	2.22	1.0	0.019	1.00	175.21	1.000	187.13	101.80	2	1.7	150.86	14.443	175.213																																												
2.297	5613.55	88.1	1.355	88.1	0.0	0.00	1.54%	Interim Cover	0.050	100.7	0.12	0.00	0.12	0	1.70	149.685	#####	173.85	760	1.54%	1.5	51%	0.67	0.00	0.67	0	1.00	0.20	1.05	1.0	0.061	91.33	265.18	1.000	16.52	0.97	0.76	0.62	2.15	1.0	0.020	1.00	173.85	1.000	173.84	95.18	2	1.7	149.69	14.331	173.850																																												
2.461	5613.39	81.2	1.017	81.2	0.2	0.08	1.25%	Interim Cover	0.050	100.7	0.12	0.00	0.12	0	1.70	138.091	#####	160.39	655	1.25%	1.5	51%	0.68	0.00	0.68	0	1.00	0.18	1.04	1.0	0.060	86.61	246.99	1.000	16.67	0.97	0.73	0.63	2.03	1.0	0.021	1.00	160.39	1.000	162.31	89.49	2	1.7	138.09	13.221	160.387																																												
2.625	5613.23	71.1	0.910	71.1	0.7	0.32	1.28%	Interim Cover	0.050	100.7	0.13	0.00	0.13	0	1.70	120.887	#####	140.41	537	1.28%	1.5	51%	0.69	0.00	0.69	0	1.00	0.15	1.03	1.0	0.059	79.60	220.01	1.000	16.82	0.97	0.68	0.66	1.90	1.0	0.023	1.00	140.41	0.337	51.37	34.09	2	1.7	120.89	11.574	140.412																																												
2.789	5613.06	61.0	0.753	61.0	-0.9	-0.37	1.24%	Interim Cover	0.050	100.7	0.14	0.00	0.14	1	1.70	103.632	#####	120.35	437	1.24%	1.6	51%	0.70	0.00	0.70	0	0.99	0.12	1.03	1.0	0.059	72.56	192.91	0.840	14.23	0.97	0.63	0.68	1.78	1.0	0.024	1.00	120.35	0.242	35.00	24.61	2	1.7	103.62	9.9209	120.352																																												
2.953	5612.90	57.1	0.690	57.1	-0.9	-0.37	1.21%	Interim Cover	0.050	100.7	0.15	0.01	0.14	1	1.70	97.036	#####	112.69	400	1.21%	1.6	51%	0.70	0.00	0.70	0	0.99	0.12	1.02	1.0	0.059	69.87	182.56	0.580	9.86	0.97	0.61	0.69	1.74	1.0	0.025	1.00	112.69	0.213	30.14	20.00	2	1.7	97.027	9.2894	112.691																																												
3.117	5612.73	50.5	0.655	50.5	-0.1	-0.05	1.30%	Interim Cover	0.050	100.7	0.16	0.01	0.15	1	1.70	85.782	#####	99.63	346	1.30%	1.6	51%	0.71	0.00	0.71	0	0.99	0.11	1.02	1.0	0.059	65.28	164.91	0.362	6.18	0.97	0.58	0.71	1.67	1.0	0.026	1.00	99.63	0.172	23.81	14.99	2	1.7	85.781	8.2126	99.629																																												
3.281	5612.57	52.1</																																																																																													

WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 2W2																																			Elev. At Top of Layer (ft)	Elev. At Midpoint of Layer (ft)	Bottom of Layer (ft)	Thickness s of Layer (ft)	Unit Weight t (pcf)	Unit Weight (pcf)	Stress at Bottom of Layer (tsf)	Stress at Midpoint of Layer (tsf)	Pressure at Bottom of Layer (tsf)	Equil Pore Pressure at Midpoint of Layer (tsf)	Stress at Bottom of Layer (tsf)	Stress at Midpoint of Layer (tsf)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									
Data File: 13-52106_SP2W2-BSC-CPT		Idriss and Boulanger (2008)										5613.10					Water surface elevation during CPT investigation (ft)					5615.85					Ground Surface Elevation at time of CPT (ft amsl)					FINAL COVER																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							

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Data File: 13-52106_SP2W3-BSC-CPT		Idriss and Boulanger (2008)				5613.80				Water surface elevation during CPT investigation (ft amsl)				5615.72				Ground Surface Elevation at time of CPT (ft amsl)				FINAL COVER																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									</

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Data File: 13-52106_SP2W3-BSC-CPT		Idriss and Boulanger (2008)										5613.80		Water surface elevation during CPT investigation (ft amsl)										5615.72		Ground Surface Elevation at time of CPT (ft amsl)										FINAL COVER		Elev. at Top of Layer (ft)		Elev. at Midpoint of Layer (ft)		Bottom of Layer (ft)		Thicknes s of Layer (ft)		Unit Weight (pcf)		Unit Weight (pcf)		Stress at Bottom of Layer (tsf)		Stress at Midpoint of Layer (tsf)		Pressure at Bottom of Layer (tsf)		Equip Pore Pressure at Midpoint of Layer (tsf)		Stress at Bottom of Layer (tsf)		Stress at Midpoint of Layer (tsf)																																																																																																																																																																																										
Location: White Mesa 2013 CPT Investigation		Max. Horiz. Acceleration, Amax/g: 0.15										5607.44		Water surface elevation at t ₀ (ft amsl)										5626.27		Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)										Erosion Protection Layer		5626.02		5625.77		0.50		0.055		110		0.028		0.014		0.00		0.00		0.028		0.014																																																																																																																																																																																												
Field Data/2013 Field Investigation/ConeTec Data		Earthquake Moment Magnitude, M: 5.5										5597.74		Water surface elevation at t ₁ (ft amsl)										0.50		Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement of Final Cover (ft amsl)										Water Storage/Rooting Zone Layer		5624.02		5622.27		3.50		0.054		107		0.215		0.121		0.00		0.00		0.215		0.121																																																																																																																																																																																												
Tailings Sands		Magnitude Scaling Factor, MSF: 1.69										5592.74		Water surface elevation at t ₂ (ft amsl)										3.50		Thickness of Water Storage/Rooting Zone (ft)										High Compaction Layer		5620.27		5618.27		4.00		0.060		120		0.454		0.334		0.00		0.00		0.454		0.334																																																																																																																																																																																												
Tailings Sand-Slimes		Youd, et al (2001)										1.44		Scaling Factor for stress ratio, r _m										2.55		Thickness of High Compaction Layer (ft)										Platform/Random Fill Layer		5617		5615.72		2.55		0.050		101		0.582		0.518		0.00		0.00		0.582		0.518																																																																																																																																																																																												
Tailings Slimes		Max. Horiz. Acceleration, Amax/g: 0.15										0.47		Volumetric Strain Ratio for Site-Specific Design Earthquake										1164.98		Additional Stress due to Final Cover Placement, Δσ _{FC} (psf)																																																																																																																																																																																																																												
Interim Cover		Earthquake Moment Magnitude, M: 5.5										7.51		Equiv. Number of Uniform Strain Cycles, N										5592.74		Elevation of bottom of tailings (liner) (ft amsl)																																																																																																																																																																																																																												
Cells Requiring User Input/Manipulation		Magnitude Scaling Factor, MSF: 2.21																																																																																																																																																																																																																																																				
2013 CPT Data from ConeTec													CPT Data Interpretations													Conditions at t ₁													Liquefaction Triggering Analyses													Idriss & Boulanger (2008)																																																																																																																																																																																																		
Depth at time of CPT (ft)													Material Type (as determined by user)													Total Stress at t ₁ (tsf)													Cyclic Stress Ratio													Cyclic Resistance Ratio													Cyclic Stress Ratio													Avg FoS													Liquefiable?													CN													qc1													qc1													qc1N																																																																																																							
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WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 2W4-C																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
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WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 2W4-C																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																												
Data File: 13-52106_SP2W4-C-BSC-CPT		Idriss and Boulanger (2008)				5611.20	Water surface elevation during CPT investigation (ft amsl)				5616.24	Ground Surface Elevation at time of CPT (ft amsl)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																
Location: White Mesa 2013 CPT Investigation		Max. Horiz. Acceleration, Amax/g:				0.15	5607.96	Water surface elevation at t ₀ (ft amsl)				5626.19	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
J:_16.2.3_Field Data\2013 Field Investigation\Conetec Data		Earthquake Moment Magnitude, M:				5.5	5593.50	Water surface elevation at t ₁ (ft amsl)				0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
Tailings Sands		Magnitude Scaling Factor, MSF:				1.69	5588.50	Water surface elevation at t ₂ (ft amsl)				3.50	Thickness of Water Storage/Rooting Zone (ft)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
Tailings Sand-Slimes		Youd, et al (2001)										4.00	Thickness of High Compaction Layer (ft)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
Tailings Slimes		Max. Horiz. Acceleration, Amax/g:				0.15	1.44	Scaling Factor for stress ratio, r _m				1.95	Thickness of Random/Platform Fill on on top of existing interim cover (ft)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
Interim Cover		Earthquake Moment Magnitude, M:				5.5	0.47	Volumetric Strain Ratio for Site-Specific Design Earthquake				1104.55	Additional Stress due to Final Cover Placement, Δσ _{FC} (psf)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
Cells Requiring User Input/Manipulation		Magnitude Scaling Factor, MSF:				2.21	7.51	Equiv. Number of Uniform Strain Cycles, N				5588.50	Elevation of bottom of tailings (liner) (ft amsl)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
2013 CPT Data from ConeTec										CPT Data Interpretations										Conditions at t _i					Liquefaction Triggering Analyses										Idriss & Boulanger (2008)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									
Depth at time of CPT (ft)	Elevation (ft amsl)	qt (TSF)	fs (TSF)	qc (TSF)	Pw (u2) (ft)	Pw (u2) PSI	fs/qt (%)	Material Type (as determined by field)	Unit Weight (pcf)	Unit Weight (pcf)	Total Stress at time of CPT (tsf)	Pore Pressure at time of CPT (tsf)	Effective Stress at time of CPT (tsf)	Saturated at time of CPT 1=Yes 0=No	CN	qc1 TSF	qc1 MPa	qc1N	Normalized Cone Penetration Resistance, Q _c	Normalized Friction Ratio, F _r (%)	Type Index, I _c	FC %	Total Stress at t _i (tsf)	Pore Pressure at t _i (tsf)	Effective Stress at t _i (tsf)	Saturated at t _i 1=Yes 0=No	Idriss & Boulanger (2008)					Youd et al. (2001)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																												
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WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 2W5-C											
Data File:	13-52106_SP2W5-C-BSC-CPT		Idriss and Boulanger (2008)				5604.20	Water surface elevation during CPT investigation (ft amsl)		5615.86	Ground Surface Elevation at time of CPT (ft amsl)
Location:	White Mesa 2013 CPT Investigation		Max. Horiz. Acceleration, Amax/g:		0.15	5604.20	Water surface elevation at t0 (ft amsl)		5626.28	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	
\\16.2.3_Field Data\2013 Field Investigation\Conetec Data			Earthquake Moment Magnitude, M:		5.5	5589.01	Water surface elevation at t1 (ft amsl)		0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement	
			Magnitude Scaling Factor, MSF:		1.69	5584.01	Water surface elevation at t2 (ft amsl)		3.50	Thickness of Water Storage/Rooting Zone (ft)	
Tailings Sands			Youd, et al (2001)						4.00	Thickness of High Compaction Layer (ft)	
Tailings Sand-Slimes			Max. Horiz. Acceleration, Amax/g:		0.15	1.44	Scaling Factor for stress ratio, r_m		2.42	Thickness of Random/Platform Fill on on top of existing interim cover (ft)	
Tailings Slimes			Earthquake Moment Magnitude, M:		5.5	0.47	Volumetric Strain Ratio for Site-Specific Design Earthquake, ϵ_v		1151.89	Additional Stress due to Final Cover Placement, $\Delta\sigma_{FC}$ (psf)	
Interim Cover			Magnitude Scaling Factor, MSF:		2.21	7.51	Equiv. Number of Uniform Strain Cycles, N		5584.01	Elevation of bottom of tailings (liner) (ft amsl)	
Cells Requiring User Input/Manipulation											

	Elev. at Top of Layer (ft)	Elev. At Midpoint of Layer (ft)	Bottom of Layer (ft)	Thickness of Layer (ft)	Unit Weight (pcf)	Unit Weight (pcf)	Stress at Bottom of Layer (tsf)	Stress at Midpoint of Layer (tsf)	Pressure at Bottom of Layer (tsf)	Equil Pore Pressure at Midpoint of Layer (tsf)	Stress at Bottom of Layer (tsf)	Stress at Midpoint of Layer (tsf)
FINAL COVER												
Erosion Protection Layer	#####	5626.03	5625.78	0.50	0.055	110	0.028	0.014	0.00	0.00	0.028	0.014
Water Storage/Rooting Zone Layer	#####	5624.03	5622.28	3.50	0.054	107	0.215	0.121	0.00	0.00	0.215	0.121
High Compaction Layer	#####	5620.28	5618.28	4.00	0.060	120	0.454	0.334	0.00	0.00	0.454	0.334
Platform/Random Fill Layer	#####	5617.07	5615.86	2.42	0.050	101	0.576	0.515	0.00	0.00	0.576	0.515

2013 CPT Data from ConeTec										CPT Data Interpretations										Conditions at t _i										Liquefaction Triggering Analyses										Idriss & Boulanger (2008)											
Depth at time of CPT (ft)	Elevation (ft amsl)	qt	fs	qc	Pw (u2) (ft)	Pw (u2) (psi)	fs/qt (%)	Material Type (as determined by CPT)	Unit Weight (pcf)	Unit Weight of CPT (pcf)	Total Stress at time of CPT (tsf)	Pore Pressure at time of CPT (tsf)	Effective Stress at time of CPT (tsf)	Saturated at time of CPT 1=Yes 0=No	CN	qc1	qc1	qc1N	Normalized Cone Penetration Resistance, q _c	Normalized Friction Ratio, F _r (%)	Type Index, I _c	FC %	Total Stress at t _i (tsf)	Pore Pressure at t _i (tsf)	Effective Stress at t _i (tsf)	Saturated at t _i 1=Yes 0=No	Idriss & Boulanger (2008)										Youd et al. (2001)										Idriss & Boulanger (2008)				
																											r _d	C _{cs}	K _{cs}	K _s	CSR	Δq _{Ct1}	qc _{Ct1-cs}	(CRR)	M=7.5, s/v=1atm	FoS	r _d	D _r	f	K _{cs}	K _s	CSR	M=7.5, s/v=1atm	Kc	qc _{Ct1-cs}	(CRR)	M=7.5, s/v=1atm	FoS	Avg FoS	Liquefiable? 1=Yes 2=No	CN
0.164	5615.70	4.8	0.029	4.8	1.1	0.49	0.60%	Interim Cover	0.050	100.7	0.01	0.00	0.01	0	1.70	8.143	113.19	9.47	580	0.61%	1.2	51%	0.58	0.00	0.58	0	1.00	0.04	1.02	1.0	0.059	33.64	43.12	0.071	1.21	0.98	0.18	0.80	2.53	1.0	0.017	1.00	9.47	0.058	4.26	2.74	2	1.7	8.155	0.7808	9.472
0.328	5615.53	11.7	0.170	11.6	8.2	3.56	1.46%	Interim Cover	0.050	100.7	0.02	0.00	0.02	0	1.70	19.737	274.34	23.02	705	1.46%	1.5	51%	0.59	0.00	0.59	0	1.00	0.05	1.02	1.0	0.059	38.40	61.43	0.089	1.52	0.97	0.28	0.80	2.20	1.0	0.019	1.00	23.02	0.069	4.34	2.93	2	1.7	19.824	1.898	23.025
0.492	5615.37	34.1	0.408	34.1	8.9	3.84	1.20%	Interim Cover	0.050	100.7	0.02	0.00	0.02	0	1.70	57.885	804.60	67.34	1375	1.20%	1.3	51%	0.60	0.00	0.60	0	1.00	0.08	1.03	1.0	0.060	53.95	121.29	0.182	3.06	0.97	0.47	0.76	2.32	1.0	0.019	1.00	67.34	0.108	6.40	4.73	2	1.7	57.979	5.5509	67.339
0.656	5615.20	51.6	0.661	51.6	1.4	0.59	1.28%	Interim Cover	0.050	100.7	0.03	0.00	0.03	0	1.70	87.686	1218.84	101.86	1560	1.28%	1.4	51%	0.61	0.00	0.61	0	1.00	0.11	1.04	1.0	0.060	66.07	167.92	0.388	6.46	0.97	0.58	0.71	2.59	1.0	0.017	1.00	101.86	0.178	11.62	9.04	2	1.7	87.7	8.3964	101.859
0.820	5615.04	73.2	1.112	73.1	6.6	2.84	1.52%	Interim Cover	0.050	100.7	0.04	0.00	0.04	0	1.70	124.304	1727.83	144.45	1770	1.52%	1.4	51%	0.62	0.00	0.62	0	1.00	0.15	1.05	1.0	0.061	81.01	225.47	1.000	16.46	0.97	0.69	0.65	2.87	1.0	0.015	1.00	144.45	0.360	23.84	20.15	2	1.7	124.37	11.908	144.452
0.984	5614.88	89.2	1.392	89.2	-0.9	-0.37	1.56%	Interim Cover	0.050	100.7	0.05	0.00	0.05	0	1.70	151.606	2107.32	176.07	1798	1.56%	1.4	51%	0.63	0.00	0.63	0	1.00	0.20	1.07	1.0	0.062	92.11	268.18	1.000	16.24	0.97	0.77	0.62	2.98	1.0	0.014	1.00	176.07	1.000	62.26	39.25	2	1.7	151.6	14.514	176.071
1.148	5614.71	116.0	1.613	115.8	37.9	16.43	1.39%	Interim Cover	0.050	100.7	0.06	0.00	0.06	0	1.70	196.792	2735.41	229.03	2005	1.39%	1.4	51%	0.63	0.00	0.63	0	1.00	0.30	1.09	1.0	0.063	110.69	339.72	1.000	15.84	0.97	0.87	0.60	2.95	1.0	0.015	1.00	229.03	1.000	54.71	35.28	2	1.7	197.19	18.879	229.029
1.312	5614.55	135.8	1.481	135.7	12.6	5.44	1.09%	Interim Cover	0.050	100.7	0.07	0.00	0.07	0	1.70	230.724	3207.06	268.13	2054	1.09%	1.3	51%	0.64	0.00	0.64	0	1.00	0.30	1.09	1.0	0.063	124.41	392.54	1.000	15.90	0.97	0.95	0.60	2.79	1.0	0.015	1.00	268.13	1.000	65.11	40.50	2	1.7	230.86	22.102	268.127
1.476	5614.38	141.1	2.556	141.1	16.3	7.07	1.81%	Interim Cover	0.050	100.7	0.07	0.00	0.07	0	1.70	239.717	3332.07	278.62	1897	1.81%	1.5	51%	0.65	0.00	0.65	0	1.00	0.30	1.08	1.0	0.063	128.10	406.71	1.000	15.95	0.97	0.96	0.60	2.66	1.0	0.016	1.00	278.62	1.000	62.14	39.05	2	1.7	239.89	22.967	278.618
1.640	5614.22	158.3	2.323	158.2	7.6	3.31	1.47%	Interim Cover	0.050	100.7	0.08	0.00	0.08	0	1.70	268.974	3738.74	312.49	1915	1.47%	1.4	51%	0.66	0.00	0.66	0	1.00	0.30	1.08	1.0	0.062	139.98	452.47	1.000	16.01	0.97	1.02	0.60	2.55	1.0	0.017	1.00	312.49	1.000	243.22	129.62	2	1.7	269.05	25.759	312.491
1.804	5614.06	219.1	2.632	219.1	7.2	3.12	1.20%	Interim Cover	0.050	100.7	0.09	0.00	0.09	0	1.70	372.453	5177.10	432.67	2410	1.20%	1.3	51%	0.67	0.00	0.67	0	1.00	0.30	1.08	1.0	0.062	182.16	614.83	1.000	16.07	0.97	1.20	0.60	2.46	1.0	0.017	1.00	432.67	1.000	221.20	118.63	2	1.7	372.53	35.666	432.671
1.968	5613.89	216.1	2.814	216.0	10.4	4.50	1.30%	Interim Cover	0.050	100.7	0.10	0.00	0.10	0	1.70	367.251	5104.79	426.67	2179	1.30%	1.3	51%	0.68	0.00	0.68	0	1.00	0.30	1.07	1.0	0.062	180.05	606.72	1.000	16.13	0.97	1.19	0.60	2.37	1.0	0.018	1.00	426.67	1.000	202.84	109.49	2	1.7	367.36	35.171	426.668
2.133	5613.73	184.6	2.875	184.5	8.4	3.65	1.56%	Interim Cover	0.050	100.7	0.11	0.00	0.11	0	1.70	313.718	4360.68	364.47	1718	1.56%	1.4	51%	0.68	0.00	0.68	0	1.00	0.30	1.07	1.0	0.062	158.22	522.69	1.000	16.20	0.97	1.10	0.60	2.30	1.0	0.019	1.00	364.47	1.000	187.31	101.76	2	1.7	313.81	30.044	364.468
2.297	5613.56	191.7	3.125	191.7	11.1	4.81	1.63%	Interim Cover	0.050	100.7	0.12	0.00	0.12	0	1.70	325.524	4524.79	378.21	1657	1.63%	1.5	51%	0.69	0.00	0.69	0	1.00	0.30	1.07	1.0	0.061	163.05	541.26	1.000	16.27	0.97	1.12	0.60	2.23	1.0	0.019	1.00	378.21	1.000	174.00	95.14	2	1.69827	325.64	31.177	378.214
2.461	5613.40	166.4	3.732	166.3	8.8	3.82	2.24%	Interim Cover	0.050	100.7	0.12	0.00	0.12	0	1.67	277.345	3855.09	322.23	1342	2.24%	1.6	51%	0.70	0.00	0.70	0	1.00	0.30	1.06	1.0	0.061	143.40	465.63	1.000	16.34	0.97	1.04	0.60	2.17	1.0	0.020	1.00	322.23	1.000	162.47	89.40	2	1.667638	277.44	26.562	322.226
2.625	5613.24	152.8	3.596	152.7	5.5	2.40	2.35%	Interim Cover	0.050	100.7	0.13	0.00	0.13	0	1.64	250.398	3480.54	290.89	1155	2.36%	1.6	51%	0.71	0.00	0.71	0	1.00	0.30	1.06	1.0	0.061	132.40	423.29	1.000	16.41	0.97	0.98	0.60	2.12	1.0	0.020	1.00	290.50	1.000	152.37	84.39	2	1.639484	250.45	23.979	290.888
2.789	5613.07	141.7	3.046	141.7	2.9	1.26	2.15%	Interim Cover	0.050	100.7	0.14	0.00	0.14	0	1.61	228.613	3177.71	265.55	1008	2.15%	1.6	51%	0.72	0.00	0.72	0	0.99	0.30	1.06	1.0	0.061	123.51	389.07	1.000	16.48	0.97	0.94	0.60	2.07	1.0	0.021	1.00	265.55	1.000	143.47	79.97	2	1.61347	228.64	21.89	265.554
2.953	5612.91	135.3	2.327	135.3	3.0	1.28	1.72%	Interim Cover	0.050	100.7	0.15	0.00	0.15	0	1.60	216.180	3004.91	251.11	909	1.72%	1.5	51%	0.72	0.00	0.72	0	0.99	0.30	1.05	1.0	0.060	118.44	369.56	1.000	16.55	0.97	0.91	0.60	2.02	1.0	0.021	1.00	251.11	1.000	135.55	76.05	2	1.598376	216.21	20.7	251.115
3.117	5612.74	130.1	2.548	130.1	2.3	0.98	1.96%	Interim Cover	0.050	100.7	0.16	0.00	0.16	0	1.60	208.053	2898.19	242.19	828	1.96%	1.6	51%	0.73	0.00	0.73	0	0.99	0.30	1.05	1.0	0.060	115.31	357.50	1.000	16.62	0.97	0.90	0.60	1.98	1.0	0.022	1.00	242.19	1.000	128.47	72.54	2	1.603006	208.53	19.964	242.190
3.281	5612.58	111.7	2.753	111.7	2.9	1.27	2.46%	Sand-Slime Tailin	0.047	93.3	0.16	0.00	0.16	0	1.67	186.121	2587.09	216.20	678	2.47%	1.7	47%	0.74	0.00	0.74	0	0.99	0.30	1.05	1.0	0.060	106.13	322.33	1.000	16.68	0.97	0.8														

WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 2W5-C									
Data File: Location: J:\1.6.2.3 Field Data\2013 Field Investigation\Conotec Data	13-52106_SP2W5-C-BSC-CPT			Idriss and Boulanger (2008)			5604.20		
	White Mesa 2013 CPT Investigation			Max. Horiz. Acceleration, A _{max} /g:			0.15		
				Earthquake Moment Magnitude, M:			5.5		
				Magnitude Scaling Factor, MSF:			1.69		
				Youd, et al (2001)					
Tailings Sands				Max. Horiz. Acceleration, A _{max} /g:			0.15		
Tailings Sand-Slimes				Earthquake Moment Magnitude, M:			5.5		
Tailings Slimes				Magnitude Scaling Factor, MSF:			2.21		
Interim Cover									
Cells Requiring User Input/Manipulation									

5604.20	Water surface elevation during CPT investigation (ft amsl)	5615.86	Ground Surface Elevation at time of CPT (ft amsl)
5604.20	Water surface elevation at t ₀ (ft amsl)	5626.28	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)
5589.01	Water surface elevation at t ₁ (ft amsl)	0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement of Final Cover (ft)
5584.01	Water surface elevation at t ₂ (ft amsl)	3.50	Thickness of Water Storage/Rooting Zone (ft)
		4.00	Thickness of High Compaction Layer (ft)
1.44	Scaling Factor for stress ratio, r _m	2.42	Thickness of Random/Platform Fill on or top of existing interim cover (ft)
0.47	Volumetric Strain Ratio for Site-Specific Design Earthquake	1151.89	Additional Stress due to Final Cover Placement, Δσ _{FC} (psf)
7.51	Equiv. Number of Uniform Strain Cycles, N	5584.01	Elevation of bottom of tailings (liner) (ft amsl)

Elev. at Top of Layer (ft)	Elev. At Midpoint of Layer (ft)	Bottom of Layer (ft)	Thickness of Layer (ft)	Unit Weight (pcf)	Unit Weight (pcf)	Stress at Bottom of Layer (tsf)	Stress at Midpoint of Layer (tsf)	Pressure at Bottom of Layer (tsf)	Equil Pore Pressure at Midpoint of Layer (tsf)	Stress at Bottom of Layer (tsf)	Stress at Midpoint of Layer (tsf)
5626.03	5625.78	5625.78	0.50	0.055	110	0.028	0.014	0.00	0.00	0.028	0.014
5624.03	5622.28	5622.28	3.50	0.054	107	0.215	0.121	0.00	0.00	0.215	0.121
5620.28	5618.28	5618.28	4.00	0.060	120	0.454	0.334	0.00	0.00	0.454	0.334
5617.07	5615.86	5615.86	2.42	0.050	101	0.576	0.515	0.00	0.00	0.576	0.515

2013 CPT Data from ConeTec								CPT Data Interpretations										Conditions at t _i				Liquefaction Triggering Analyses																										
Depth at time of CPT (ft)	Elevation (ft amsl)	qt	fs	qc	Pw (u2) (ft)	Pw (u2) PSI	fs/qt (%)	Material Type (as determined by CPT)	Unit Weight (pcf)	Unit Weight of CPT (pcf)	Total Stress at time of CPT (tsf)	Effective Stress at time of CPT (tsf)	Saturated at time of CPT 1=Yes 0=No	CN	qc1	qc1 TSF	qc1 MPa	qc1N	Normalized Cone Penetration Resistance, q _c	Normalized Friction Ratio, F _r (%)	Type Index, I _c	FC %	Total Stress at t _i (tsf)	Pore Pressure at t _i (tsf)	Effective Stress at t _i (tsf)	Saturated at t _i 1=Yes 0=No	Idriss & Boulanger (2008)										Youd et al. (2001)										Avg FoS	Liquefiable? 1=Yes 2=No
																											Cyclic Stress Ratio					Cyclic Resistance Ratio					FoS	Cyclic Stress Ratio					CRR					
r _d	C _{cs}	K _{cs}	K _s	CSR	Δqc _{in}	qc _{in-cs}	(CRR)	M=7.5, s/v=1atm	M=7.5, s/v=1atm	M=7.5, s/v=1atm	M=7.5, s/v=1atm	r _d	D _r	f	K _{cs}	K _s	CSR	M=7.5, s/v=1atm	Kc	qc _{in-cs}	(CRR)	M=7.5, s/v=1atm	FoS																									
12.139	5603.72	13.5	0.096	13.4	5.0	2.18	0.71%	Sand-Slime Tailin	0.059	119.0	0.59	0.01	0.58	1	1.36	18.315	254.58	21.32	22	0.75%	2.4	47%	1.17	0.00	1.17	0	0.94	0.05	0.98	1.0	0.053	37.78	59.10	0.087	1.63	0.95	0.27	0.80	1.08	1.0	0.039	2.26	48.23	0.090	3.22	2.42	2	
12.303	5603.56	11.6	0.118	11.5	11.0	4.78	1.02%	Sand-Slime Tailin	0.059	119.0	0.60	0.02	0.58	1	1.36	15.638	217.37	18.27	19	1.07%	2.5	47%	1.18	0.00	1.18	0	0.94	0.05	0.98	1.0	0.053	36.71	54.98	0.082	1.55	0.95	0.25	0.80	1.08	1.0	0.039	2.90	53.04	0.094	3.32	2.44	2	
12.467	5603.39	11.3	0.166	11.2	12.8	5.56	1.47%	Sand-Slime Tailin	0.059	119.0	0.61	0.03	0.59	1	1.35	15.110	210.03	17.67	18	1.56%	2.6	47%	1.19	0.00	1.19	0	0.93	0.05	0.98	1.0	0.053	36.50	54.18	0.082	1.54	0.95	0.24	0.80	1.08	1.0	0.039	3.47	61.35	0.101	3.57	2.55	2	
12.631	5603.23	11.0	0.151	10.9	12.5	5.42	1.38%	Sand-Slime Tailin	0.059	119.0	0.62	0.03	0.59	1	1.34	14.588	202.77	17.06	17	1.46%	2.6	47%	1.20	0.00	1.20	0	0.93	0.05	0.98	1.0	0.053	36.29	53.35	0.081	1.52	0.95	0.24	0.80	1.08	1.0	0.039	3.47	59.22	0.099	3.46	2.49	2	
12.795	5603.06	18.2	0.083	18.2	2.6	1.13	0.46%	Sand-Slime Tailin	0.059	119.0	0.63	0.04	0.60	1	1.31	23.841	331.39	27.71	29	0.47%	2.2	47%	1.21	0.00	1.21	0	0.93	0.06	0.98	1.0	0.053	40.02	67.74	0.097	1.83	0.95	0.30	0.80	1.08	1.0	0.039	1.65	45.66	0.088	3.05	2.44	2	
12.959	5602.90	20.3	0.069	20.3	0.7	0.29	0.34%	Sand-Slime Tailin	0.059	119.0	0.64	0.04	0.60	1	1.30	26.297	365.53	30.55	33	0.35%	2.1	47%	1.22	0.00	1.22	0	0.93	0.06	0.98	1.0	0.053	41.02	71.56	0.102	1.93	0.95	0.32	0.80	1.07	1.0	0.039	1.46	44.47	0.087	2.99	2.46	2	
13.123	5602.74	21.3	0.128	21.3	-0.0	-0.01	0.60%	Sand-Slime Tailin	0.059	119.0	0.65	0.05	0.61	1	1.29	27.402	380.89	31.83	34	0.62%	2.2	47%	1.23	0.00	1.23	0	0.93	0.06	0.98	1.0	0.053	41.46	73.29	0.104	1.97	0.95	0.33	0.80	1.07	1.0	0.039	1.63	51.99	0.093	3.18	2.57	2	
13.287	5602.57	22.1	0.250	22.1	2.2	0.94	1.13%	Sand-Slime Tailin	0.059	119.0	0.66	0.05	0.61	1	1.28	28.264	392.88	32.85	35	1.16%	2.3	47%	1.24	0.00	1.24	0	0.93	0.06	0.98	1.0	0.052	41.82	74.67	0.106	2.01	0.94	0.33	0.80	1.07	1.0	0.039	1.99	65.50	0.106	3.60	2.80	2	
13.451	5602.41	17.9	0.288	17.9	3.9	1.69	1.61%	Sand-Slime Tailin	0.059	119.0	0.67	0.06	0.61	1	1.29	22.955	319.07	26.70	28	1.67%	2.5	47%	1.25	0.00	1.25	0	0.93	0.06	0.98	1.0	0.052	39.66	66.36	0.095	1.81	0.94	0.30	0.80	1.07	1.0	0.039	2.69	71.93	0.115	3.85	2.83	2	
13.615	5602.24	16.1	0.193	16.1	8.8	3.83	1.20%	Sand-Slime Tailin	0.059	119.0	0.68	0.06	0.62	1	1.28	20.647	287.00	24.06	25	1.25%	2.5	47%	1.26	0.00	1.26	0	0.93	0.06	0.98	1.0	0.052	38.74	62.80	0.091	1.74	0.94	0.28	0.80	1.07	1.0	0.039	2.56	61.51	0.102	3.39	2.57	2	
13.779	5602.08	19.4	0.123	19.3	9.7	4.21	0.63%	Sand-Slime Tailin	0.059	119.0	0.69	0.07	0.62	1	1.27	24.473	340.18	28.51	30	0.66%	2.2	47%	1.27	0.00	1.27	0	0.92	0.06	0.98	1.0	0.052	40.30	68.82	0.098	1.88	0.94	0.31	0.80	1.07	1.0	0.039	1.79	51.10	0.092	3.06	2.47	2	
13.943	5601.92	25.1	0.130	25.1	8.8	3.83	0.52%	Sand-Slime Tailin	0.059	119.0	0.70	0.07	0.63	1	1.24	31.169	433.25	36.28	39	0.53%	2.1	47%	1.28	0.00	1.28	0	0.92	0.06	0.98	1.0	0.052	43.03	79.31	0.112	2.15	0.94	0.35	0.80	1.06	1.0	0.039	1.47	53.16	0.094	3.09	2.62	2	
14.107	5601.75	25.6	0.219	25.6	8.3	3.58	0.85%	Sand-Slime Tailin	0.059	119.0	0.71	0.08	0.63	1	1.24	31.630	439.66	36.81	39	0.88%	2.2	47%	1.29	0.00	1.29	0	0.92	0.06	0.97	1.0	0.052	43.21	80.02	0.113	2.17	0.94	0.35	0.80	1.06	1.0	0.039	1.68	62.01	0.102	3.34	2.75	2	
14.271	5601.59	25.3	0.206	25.3	14.8	6.43	0.81%	Sand-Slime Tailin	0.059	119.0	0.72	0.08	0.64	1	1.23	31.101	432.30	36.25	39	0.84%	2.2	47%	1.30	0.00	1.30	0	0.92	0.06	0.97	1.0	0.052	43.02	79.27	0.112	2.15	0.94	0.35	0.80	1.06	1.0	0.039	1.67	60.69	0.101	3.27	2.71	2	
14.436	5601.42	28.0	0.355	27.9	15.7	6.79	1.27%	Sand-Slime Tailin	0.059	119.0	0.73	0.09	0.64	1	1.22	33.991	472.48	39.62	42	1.30%	2.3	47%	1.31	0.00	1.31	0	0.92	0.06	0.97	1.0	0.052	44.20	83.81	0.118	2.28	0.94	0.36	0.80	1.06	1.0	0.039	1.87	74.22	0.118	3.81	3.04	2	
14.600	5601.26	21.9	0.337	21.8	19.3	8.38	1.54%	Sand-Slime Tailin	0.059	119.0	0.74	0.09	0.65	1	1.23	26.771	372.11	31.26	33	1.59%	2.4	47%	1.32	0.00	1.32	0	0.92	0.06	0.97	1.0	0.052	41.27	72.53	0.103	1.99	0.94	0.32	0.80	1.06	1.0	0.039	2.38	74.56	0.119	3.80	2.89	2	
14.764	5601.10	27.4	0.402	27.2	33.6	14.56	1.47%	Sand-Slime Tailin	0.059	119.0	0.75	0.10	0.65	1	1.21	32.863	456.79	38.46	41	1.51%	2.3	47%	1.32	0.00	1.32	0	0.92	0.06	0.97	1.0	0.052	43.79	82.25	0.116	2.25	0.94	0.36	0.80	1.06	1.0	0.039	2.04	78.35	0.125	3.97	3.11	2	
14.928	5600.93	49.6	0.629	49.5	20.9	9.05	1.27%	Sand Tailings	0.062	123.5	0.76	0.10	0.66	1	1.17	57.889	804.66	67.41	74	1.29%	2.1	18%	1.33	0.00	1.33	0	0.92	0.08	0.96	1.0	0.051	39.32	106.73	0.154	3.02	0.94	0.47	0.76	1.07	1.0	0.039	1.42	95.65	0.161	5.10	4.06	2	
15.092	5600.77	29.2	0.705	29.1	11.9	5.15	2.41%	Sand-Slime Tailin	0.059	119.0	0.77	0.11	0.66	1	1.19	34.821	484.01	40.55	43	2.48%	2.4	47%	1.34	0.00	1.34	0	0.91	0.07	0.97	1.0	0.051	44.52	85.07	0.120	2.33	0.94	0.37	0.80	1.05	1.0	0.039	2.51	101.61	0.178	5.57	3.95	2	
15.256	5600.60	26.1	0.521	26.1	10.3	4.48	1.99%	Sand-Slime Tailin	0.059	119.0	0.78	0.11	0.67	1	1.20	31.170	433.26	36.29	38	2.05%	2.4	47%	1.35	0.00	1.35	0	0.91	0.06	0.97	1.0	0.051	43.03	79.32	0.112	2.18	0.94	0.35	0.80	1.05	1.0	0.039	2.45	88.96	0.145	4.54	3.36	2	
15.420	5600.44	21.1	0.398	21.0	25.4	11.00	1.88%	Sand-Slime Tailin	0.059	119.0	0.79	0.12	0.67	1	1.20	25.169	348.85	29.45	30	1.96%	2.5	47%	1.36	0.00	1.36	0	0.91	0.06	0.97	1.0	0.051	40.63	70.08	0.100	1.94	0.94	0.31	0.80	1.05	1.0	0.039	2.75	81.14	0.130	4.02	2.98	2	
15.584	5600.28	18.2	0.232	17.9	47.5	20.56	1.28%	Sand-Slime Tailin	0.059	119.0	0.80	0.12	0.68	1	1.20	21.442	298.05	25.32	26	1.34%	2.5	47%	1.37	0.00	1.37	0	0.91	0.06	0.97	1.0	0.051	39.18	64.50	0.093	1.81	0.94	0.29	0.80	1.05	1.0	0.039	2.58	65.28	0.106	3.26	2.54	2	
15.748	5600.11	17.7	0.358	17.4	55.7	24.12	2.02%	Sand-Slime Tailin	0.059	119.0	0.81	0.13	0.68	1	1.20	20.745	288.36	24.58	25	2.12%	2.6	47%	1.38	0.00	1.38	0	0.91	0.06	0.97	1.0	0.051	38.92	63.50	0.092	1.79	0.94	0.29	0.80	1.05	1.0	0.039	3.25	79.94	0.128	3.90	2.85	2	
15.912	5599.95	15.1	0.207	14.6	74.8	32.40	1.37%	Sand-Slime Tailin	0.059	119.0	0.82	0.13	0.68	1	1.20																																	

WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 2W5-C																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
Data File: 13-52106_SP2W5-C-BSC-CPT		Idriss and Boulanger (2008)				5604.20				Water surface elevation during CPT investigation (ft)				5615.86				Ground Surface Elevation at time of CPT (ft amsl)				Elev. at Top of Layer (ft)		Elev. At Midpoint of Layer (ft)		Bottom of Layer (ft)		Thicknes s of Layer (ft)		Unit Weigh t (pcf)		Unit Weight (pcf)		Stress at Bottom of Layer (tsf)		Stress at Midpoint of Layer (tsf)		Pressure at Bottom of Layer (tsf)		Equip Pore Pressure at Midpoint of Layer (tsf)		Stress at Bottom of Layer (tsf)		Stress at Midpoint of Layer (tsf)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									
Location: White Mesa 2013 CPT Investigation		Max. Horiz. Acceleration, Amax/g:				0.15				5604.20				Water surface elevation at t ₀ (ft amsl)				5626.28				Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)				FINAL COVER		Erosion Protection Layer		5626.03		5625.78		0.50		0.055		110		0.028		0.014		0.00		0.00		0.028		0.014																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																			
\\1.6.2.3_Field Data\2013 Field Investigation\Conetec Data		Earthquake Moment Magnitude, M:				5.5				5589.01				Water surface elevation at t ₁ (ft amsl)				0.50				Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement				ater Storage/Rooting Zone Layer		5624.03		5622.28		3.50		0.054		107		0.215		0.121		0.00		0.00		0.215		0.121																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
Tailings Sands		Magnitude Scaling Factor, MSF:				1.69				5584.01				Water surface elevation at t ₂ (ft amsl)				3.50				Thickness of Water Storage/Rooting Zone (ft)				High Compaction Layer		5620.28		5618.28		4.00		0.060		120		0.454		0.334		0.00		0.00		0.454		0.334																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
Tailings Sand-Slimes		Youd, et al (2001)				Max. Horiz. Acceleration, Amax/g:				0.15				1.44				Scaling Factor for stress ratio, r _m				2.42				Thickness of High Compaction Layer (ft)				Thickness of Random/Platform Fill on or top of existing interim cover (ft)		Platform/Random Fill Layer		5617.07		5615.86		2.42		0.050		101		0.576		0.515		0.00		0.00		0.576		0.515																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
Tailings Slimes		Earthquake Moment Magnitude, M:				5.5				0.47				Volumetric Strain Ratio for Site-Specific Design Earthquake				1151.89				Additional Stress due to Final Cover Placement, Δσ _{FC} (psf)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
Interim Cover		Magnitude Scaling Factor, MSF:				2.21				7.51				Equiv. Number of Uniform Strain Cycles, N				5584.01				Elevation of bottom of tailings (liner) (ft amsl)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
Cells Requiring User Input/Manipulation																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					

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WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 2W6-S																																																		
Data File: 13-52106_SP2W6-S-BSC-CPT			Idriss and Boulanger (2008)			5604.40			Water surface elevation during CPT investigation (ft)			5615.85			Ground Surface Elevation at time of CPT (ft amsl)			5625.41			Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)			FINAL COVER																										
Location: White Mesa 2013 CPT Investigation			Max. Horiz. Acceleration, A _{max} /g:			0.15			5604.40			Water surface elevation at t ₀ (ft amsl)			5625.41			5625.41			Erosion Protection Layer			Erosion Protection Layer																										
Field Data/2013 Field Investigation/Conotec Data			Earthquake Moment Magnitude, M:			5.5			5588.59			Water surface elevation at t ₁ (ft amsl)			0.50			Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement of Final Cover			5625.41			ater Storage/Rooting Zone Layer																										
Tailings Sands			Magnitude Scaling Factor, MSF:			1.69			5583.59			Water surface elevation at t ₂ (ft amsl)			3.50			Thickness of Water Storage/Rooting Zone (ft)			5623.16			High Compaction Layer																										
Tailings Sand-Slimes			Youd, et al (2001)												4.00			Thickness of High Compaction Layer (ft)			5619.41			Platform/Random Fill Layer																										
Tailings Slimes			Max. Horiz. Acceleration, A _{max} /g:			0.15			1.44			Scaling Factor for stress ratio, r _m			1.56			Thickness of Random/Platform Fill on on top of existing interim cover (ft)			5616.63																													
Interim Cover			Earthquake Moment Magnitude, M:			5.5			0.47			Volumetric Strain Ratio for Site-Specific Design Earthquake			1065.26			Additional Stress due to Final Cover Placement, Δσ _{FC} (psf)																																
Cells Requiring User Input/Manipulation			Magnitude Scaling Factor, MSF:			2.21			7.51			Equiv. Number of Uniform Strain Cycles, N			5583.59			Elevation of bottom of tailings (liner) (ft amsl)																																
2013 CPT Data from ConeTec										CPT Data Interpretations										Conditions at t _i					Liquefaction Triggering Analyses										Idriss & Boulanger (2008)															
Depth at time of CPT (ft)	Elevation (ft amsl)	qt	fs	qc	Pw (u2) (ft)	Pw (u2) (psi)	fs/qt (%)	Material Type (as determined by surface)	Unit Weight (pcf)	Unit Weight (pcf)	Stress at time of CPT (tsf)	Effective Stress at time of CPT (tsf)	Saturated at time of CPT 1=Yes 0=No	CN	qc1 TSF	qc1 MPa	qc1N	Normalized Cone Penetration Resistance, q _c	Normalized Friction Ratio, F _r (%)	Type Index, I _c	FC %	Total Stress at t _i (tsf)	Pore Pressure at t _i (tsf)	Effective Stress at t _i (tsf)	Saturated at t _i 1=Yes 0=No	r _d	C _o	K _{cs}	K _{cs}	CSR	Δq _{cs}	q _{c1-cs}	M=7.5, s/v=1atm	FoS	r _d	D _r	f	K _{cs}	CSR	M=7.5, s/v=1atm	K _c	q _{c1-cs}	(CRR)	FoS	Avg FoS	Liquefiable? 1=Yes 2=No	CN	qc1 TSF	qc1 MPa	qc1N
12.139	5603.71	12.2	0.338</																																															

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WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 2W7-C																																																			
Data File: 13-52106_SP2W7-C-BSC-CPT		Idriss and Boulanger (2008)					5613.10 Water surface elevation during CPT investigation (ft amsl)					5619.60 Ground Surface Elevation at time of CPT (ft amsl)																																							
Location: White Mesa 2013 CPT Investigation		Max. Horiz. Acceleration, Amax/g: 0.15					5611.32 Water surface elevation at t1 (ft amsl)					5626.65 Ground Surface Elevation immediately after Placement of Final Cover (ft amsl)																																							
13-52106_2.3 Field Data 2013 Field Investigation/Conotec Data		Earthquake Moment Magnitude, M: 5.5					5595.40 Water surface elevation at t2 (ft amsl)					0.50 Thickness of Erosion Protection Layer (rock mulch/topsoils) immediately after placement of Final Cover (ft)																																							
Tailings Sands		Magnitude Scaling Factor, MSF: 1.69					5590.40 Water surface elevation at t3 (ft amsl)					3.50 Thickness of Water Storage/Rooting Zone (ft)																																							
Tailings Sand-Slimes		Youd, et al (2001)										4.00 Thickness of High Compaction Layer (ft)																																							
Tailings Slimes		Max. Horiz. Acceleration, Amax/g: 0.15					0.47 Scaling Factor for stress ratio, r_m					-0.95 Thickness of Random/Platform Fill on on top of existing interim cover (ft)																																							
Interim Cover		Earthquake Moment Magnitude, M: 5.5					0.47 Volumetric Strain Ratio for Site-Specific Design Earthquake					812.44 Additional Stress due to Final Cover Placement, ΔσFC (psf)																																							
Cells Requiring User Input/Manipulation		Magnitude Scaling Factor, MSF: 2.21					7.51 Equiv. Number of Uniform Strain Cycles, N					5590.40 Elevation of bottom of tailings (liner) (ft amsl)																																							
2013 CPT Data from ConeTec															Material Type (as determined by user)	CPT Data Interpretations										Conditions at t1					Liquefaction Triggering Analyses										Idriss & Boulanger (2008)										
Depth at time of CPT (ft)	Elevation (ft amsl)	qt	fs	Pw (u2)	Pw (u2)	fs/qs	fs/qs	fs/qs	fs/qs	fs/qs	fs/qs	fs/qs	fs/qs	fs/qs	Unit Weight (pcf)	Unit Weight (pcf)	Stress at time of CPT (tsf)	Pore Pressure Ratio, r	Effective Stress at time of CPT (tsf)	Saturated at time of CPT 1=Yes 0=No	CN	qc1	qc1	qc1	qc1N	Normalized Cone Penetration Resistance, Rn	Normalized Friction Ratio, Fr	Type Index, Ix	Total Stress at t1 (tsf)	Pore Pressure at t1 (tsf)	Effective Stress at t1 (tsf)	Saturated at t1 1=Yes 0=No	Cyclic Stress Ratio	Cyclic Resistance Ratio (CRR)	Fo	Cyclic Stress Ratio	Cyclic Resistance Ratio (CRR)	Fo	Avg Fo	Liquefiable? 1=Yes 2=No	CN	qc1	qc1	qc1N							
0.164	5619.44	37.3	0.106	37.3	3.0	1.31	0.28%	Interim Cover	0.050	100.7	0.01	0.00	0.01	0	1.70	63.359	880.69	73.63	4513	0.28%	0.7	51%	0.41	0.00	0.41	0	1.00	0.09	1.06	1.0	0.061	56.16	129.78	0.202	3.29	0.98	0.50	0.75	3.16	1.0	0.014	1.00	73.63	0.117	281.58	142.44	2	1.7	63.391	6.0691	73.625
0.328	5619.27	49.3	0.150	49.3	3.1	1.34	0.30%	Interim Cover	0.050	100.7	0.02	0.00	0.02	0	1.70	83.827	#####	97.40	2985	0.30%	0.7	51%	0.42	0.00	0.42	0	1.00	0.10	1.07	1.0	0.062	64.50	161.90	0.339	5.46	0.98	0.57	0.72	3.08	1.0	0.014	1.00	97.40	0.166	199.54	102.50	2	1.7	83.86	8.0287	97.398
0.492	5619.11	59.2	0.224	59.1	4.5	1.95	0.38%	Interim Cover	0.050	100.7	0.02	0.00	0.02	0	1.70	100.521	#####	116.80	2386	0.38%	0.8	51%	0.43	0.00	0.43	0	1.00	0.12	1.08	1.0	0.063	71.31	188.12	0.701	11.18	0.98	0.62	0.69	3.02	1.0	0.014	1.00	116.80	0.228	183.03	97.10	2	1.7	100.57	9.6285	116.805
0.656	5618.94	63.9	0.317	63.8	2.3	0.98	0.50%	Interim Cover	0.050	100.7	0.03	0.00	0.03	0	1.70	108.528	#####	126.08	1931	0.50%	0.9	51%	0.44	0.00	0.44	0	1.00	0.13	1.09	1.0	0.063	74.56	200.64	1.000	15.90	0.98	0.65	0.68	2.88	1.0	0.015	1.00	126.08	0.266	160.29	88.10	2	1.7	108.55	10.393	126.076
0.820	5618.78	65.3	0.442	65.3	2.3	1.01	0.68%	Interim Cover	0.050	100.7	0.04	0.00	0.04	0	1.70	110.925	#####	128.86	1579	0.68%	1.1	51%	0.45	0.00	0.45	0	1.00	0.13	1.09	1.0	0.063	75.54	204.40	1.000	15.91	0.98	0.66	0.67	2.71	1.0	0.016	1.00	128.86	0.279	134.37	75.14	2	1.7	110.95	10.622	128.862
0.984	5618.62	74.0	0.500	74.0	6.1	2.66	0.68%	Interim Cover	0.050	100.7	0.05	0.00	0.05	0	1.70	125.766	#####	146.15	1492	0.68%	1.1	51%	0.46	0.00	0.46	0	1.00	0.15	1.10	1.0	0.063	81.61	227.75	1.000	15.75	0.98	0.70	0.65	2.71	1.0	0.016	1.00	146.15	0.370	148.67	82.21	2	1.7	125.83	12.047	146.145
1.148	5618.45	70.5	0.458	70.5	1.5	0.67	0.65%	Interim Cover	0.050	100.7	0.06	0.00	0.06	0	1.70	119.799	#####	139.16	1218	0.65%	1.1	51%	0.46	0.00	0.46	0	1.00	0.15	1.09	1.0	0.063	79.16	218.31	1.000	15.87	0.98	0.68	0.66	2.51	1.0	0.017	1.00	139.16	0.331	113.82	64.85	2	1.7	119.82	11.471	139.158
1.312	5618.29	76.0	0.403	76.0	0.8	0.34	0.53%	Interim Cover	0.050	100.7	0.07	0.00	0.07	0	1.70	129.234	#####	150.11	1149	0.53%	1.0	51%	0.47	0.00	0.47	0	1.00	0.16	1.10	1.0	0.063	83.00	233.11	1.000	15.78	0.98	0.71	0.65	2.48	1.0	0.017	1.00	150.11	0.395	118.90	67.34	2	1.7	129.24	12.374	150.107
1.476	5618.12	71.1	0.468	71.1	3.0	1.32	0.66%	Interim Cover	0.050	100.7	0.07	0.00	0.07	0	1.70	120.887	#####	144.44	956	0.66%	1.1	51%	0.48	0.00	0.48	0	1.00	0.15	1.09	1.0	0.063	79.61	220.05	1.000	15.93	0.98	0.68	0.66	2.31	1.0	0.019	1.00	140.44	0.338	90.47	53.20	2	1.7	120.92	11.577	140.440
1.640	5617.96	69.3	0.535	69.3	1.0	0.42	0.77%	Interim Cover	0.050	100.7	0.08	0.00	0.08	0	1.70	117.742	#####	136.76	837	0.77%	1.2	51%	0.49	0.00	0.49	0	1.00	0.14	1.08	1.0	0.062	78.31	215.08	1.000	16.00	0.98	0.68	0.66	2.21	1.0	0.020	1.00	136.76	0.318	76.70	46.35	2	1.7	117.75	11.274	136.762
1.804	5617.80	67.9	0.630	67.9	1.5	0.63	0.93%	Interim Cover	0.050	100.7	0.09	0.00	0.09	0	1.70	115.362	#####	134.00	746	0.93%	1.3	51%	0.50	0.00	0.50	0	1.00	0.14	1.08	1.0	0.062	77.35	211.35	1.000	16.07	0.98	0.67	0.67	2.12	1.0	0.020	1.00	134.00	0.304	66.66	41.36	2	1.7	115.38	11.046	134.004
1.968	5617.63	62.3	0.676	62.3	2.1	0.91	1.08%	Interim Cover	0.050	100.7	0.10	0.00	0.10	0	1.70	105.927	#####	123.05	628	1.09%	1.4	51%	0.51	0.00	0.51	0	1.00	0.13	1.07	1.0	0.062	73.50	196.56	0.977	15.83	0.98	0.64	0.68	2.00	1.0	0.022	1.00	123.05	0.253	50.97	33.40	2	1.7	105.95	10.144	123.054
2.133	5617.47	58.0	0.590	58.0	0.7	0.30	1.02%	Interim Cover	0.050	100.7	0.11	0.00	0.11	0	1.70	98.566	#####	114.49	539	1.02%	1.4	51%	0.51	0.00	0.51	0	1.00	0.12	1.06	1.0	0.061	70.50	184.98	0.628	10.25	0.98	0.62	0.69	1.90	1.0	0.023	1.00	114.49	0.220	40.80	25.53	2	1.7	98.573	9.4374	114.487
2.297	5617.30	56.9	0.428	56.9	1.5	0.65	0.75%	Interim Cover	0.050	100.7	0.12	0.00	0.12	0	1.70	96.730	#####	112.36	491	0.75%	1.3	51%	0.52	0.00	0.52	0	1.00	0.12	1.06	1.0	0.061	69.75	182.12	0.572	9.37	0.98	0.61	0.69	1.85	1.0	0.023	1.00	112.36	0.212	36.58	22.98	2	1.7	96.746	9.2624	112.364
2.461	5617.14	58.9	0.597	58.9	2.3	0.99	1.01%	Interim Cover	0.050	100.7	0.12	0.00	0.12	0	1.70	100.062	#####	116.24	474	1.02%	1.5	51%	0.53	0.00	0.53	0	1.00	0.12	1.06	1.0	0.061	71.11	187.36	0.682	11.18	0.98	0.62	0.69	1.83	1.0	0.024	1.00	116.24	0.226	36.44	23.81	2	1.7	100.09	9.5823	116.244
2.625	5616.98	67.5	0.562	67.5	1.5	0.63	0.83%	Interim Cover	0.050	100.7	0.13	0.00	0.13	0	1.70	114.801	#####	133.35	510	0.83%	1.4	51%	0.54	0.00	0.54	0	1.00	0.14	1.07	1.0	0.061	77.12	210.47	1.000	16.31	0.98	0.67	0.67	1.87	1.0	0.023	1.00	133.35	0.301	45.43	30.87	2	1.7	114.82	10.993	133.352
2.789	5616.81	68.3	0.681	68.3	1.1	0.49	1.00%	Interim Cover	0.050	100.7	0.14	0.00	0.14	0	1.70	116.076	#####	134.83	485	1.00%	1.4	51%	0.55	0.00	0.55	0	1.00	0.14	1.06	1.0	0.061	77.64	212.47	1.000	16.34	0.98	0.67	0.66	1.84	1.0	0.023	1.00	134.83	0.308	43.82	30.08	2	1.7	116.09	11.114	134.829
2.953	5616.65	72.4	0.913	72.4	0.1	0.04	1.26%	Interim Cover	0.050	100.7	0.15	0.00	0.15	0	1.70	123.114	#####	142.99	486	1.26%	1.5	51%	0.55	0.00	0.55	0	1.00	0.15	1.07	1.0	0.061	80.50	223.49	1.000	16.32	0.98	0.69	0.65	1.83	1.0	0.023	1.00	142.99	0.352	47.32	31.82	2	1.7	123.11	11.787	142.991
3.117	5616.48	67.6	0.613	67.6	0.1	0.04	0.91%	Interim Cover	0.050	100.7	0.16	0.00	0.16	0	1.70	114.869	#####	133.41	429	0.91%	1.4	51%	0.56	0.00	0.56	0	1.00	0.14	1.06	1.0	0.061	77.14	210.55	1.000	16.45	0.98	0.67	0.67	1.76	1.0	0.024	1.00	133.41	0.301	38.34	27.39	2	1.7	114.87	10.998	133.415
3.281	5616.32	81.3	2.130	81.3	-0.3	-0.12	2.62%	Sand-Slime Tailings	0.047	93.3	0.16	0.00	0.16	0	1.70	138.261	#####	160.58	493	2.62%	1.8	47%	0.57	0.00	0.57	0	1.00	0.18	1.07	1.0	0.062	86.62	247.20	1.000	16.26	0.98	0.73	0.63	1.83	1.0	0.023	1.12	179.35	1.000	121.56	68.91	2	1.7	138.26	13.237	160.578
3.445	5616.16	80.0	1.732	79.9	8.4	3.65	2.17%	Sand-Slime Tailings	0.047	93.3	0.17	0.00	0.17	0	1.70	135.864	#####	157.90	463	2.17%	1.8	47%	0.58	0.00	0.58	0	1.00	0.17	1.07	1.0	0.061	85.68	243.58	1.000	16.34	0.98	0.73	0.64	1.79	1.0	0.024	1.00	169.42	1.000	116.20	66.27	2	1.7	135.95	13.016	157.902
3.609	5615.99	65.9	1.776	65.8	3.9	1.68	2.70%	Sand-Slime Tailings	0.047	93.3	0.18	0.00	0.18	0	1.70	111.911	#####	130.03	365	2.70%	1.9	47%	0.59	0.00	0.59	0	1.00	0.14	1.05	1.0	0.060	75.90	205.93	1.000	16.60	0.98	0.66	0.67	1.67	1.0	0.026	1.18	152.78	0.412	45.82	31.21	2	1.7	111.95	10.718	130.026
3.773	5615.83	50.8	1.506	50.8	2.8	1.21	2.96%	Sand-Slime Tailings	0.047	93.3	0.19	0.00	0.19	0	1.70	86.343	#####	100.32	270	2.98%	2.0	47%	0.59	0.00	0.59	0	1.00	0.11	1.04	1.0	0.059	65.48	165.80	0.369	6.21	0.97	0.58	0.71	1.55	1.0	0.028										

WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 2W7-C																																																			
Data File: 13-52106_SP2W7-C-BSC-CPT		Idriss and Boulanger (2008)					5613.10 Water surface elevation during CPT investigation (ft amsl)					5619.60 Ground Surface Elevation at time of CPT (ft amsl)																																							
Location: White Mesa 2013 CPT Investigation		Max. Horiz. Acceleration, Amax/g: 0.15					5611.32 Water surface elevation at t0 (ft amsl)					5626.65 Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)																																							
Field Data/2013 Field Investigation/Conotec Data		Earthquake Moment Magnitude, M: 5.5					5595.40 Water surface elevation at t1 (ft amsl)					0.50 Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement of Final Cover																																							
Tailings Sands		Magnitude Scaling Factor, MSF: 1.69					5590.40 Water surface elevation at t2 (ft amsl)					3.50 Thickness of Water Storage/Rooting Zone (ft)																																							
Tailings Sand-Slimes		Youd et al (2001)										4.00 Thickness of High Compaction Layer (ft)																																							
Tailings Slimes		Max. Horiz. Acceleration, Amax/g: 0.15					1.44 Scaling Factor for stress ratio, rm					0.95 Thickness of Random/Platform Fill on on top of existing interim cover (ft)																																							
Interim Cover		Earthquake Moment Magnitude, M: 5.5					0.47 Volumetric Strain Ratio for Site-Specific Design Earthquake					812.44 Additional Stress due to Final Cover Placement, ΔσFC (psf)																																							
Cells Requiring User Input/Manipulation		Magnitude Scaling Factor, MSF: 2.21					7.51 Equiv. Number of Uniform Strain Cycles, N					5590.40 Elevation of bottom of tailings (liner) (ft amsl)																																							
2013 CPT Data from ConeTec															CPT Data Interpretations										Conditions at ti										Liquefaction Triggering Analyses										Idriss & Boulanger (2008)						
Depth at time of CPT (ft)	Elevation (ft amsl)	qt	fs	qc	Pw (u2)	Pw (u2)	fs/(qt)	Material Type (as determined by CPT)	Unit Weight (pcf)	Unit Weight of CPT (pcf)	Stress at time of CPT (tsf)	Pore Pressure at time of CPT (tsf)	Effective Stress at time of CPT (tsf)	Saturated at time of CPT 1=Yes 0=No	CN	qc1	qc1 MPa	qc1N	Normalized Cone Penetration Resistance, qc1	Normalized Friction Ratio, Fr	Type Index, Ix	FC %	Total Stress at ti (tsf)	Pore Pressure at ti (tsf)	Effective Stress at ti (tsf)	Saturated at ti 1=Yes 0=No	Idriss & Boulanger (2008)										Youd et al. (2001)										Idriss & Boulanger (2008)				
																											Cyclic Stress Ratio					Cyclic Resistance Ratio					Cyclic Stress Ratio					Cyclic Resistance Ratio					Avg FoS				
rd	Cs	Kcs	Kcs	CSR	Δqc1in	qc1in-cs	M=7.5, s/v=1atm	FoS	rd	Di	f	Kcs	Kcs	CSR	Kc	qc1in-cs	M=7.5, s/v=1atm	FoS	Avg FoS	Liquefiable? 1=Yes 2=No	CN	qc1 TSF	qc1 MPa	qc1N																											
12.139	5607.46	12.7	0.171	12.4	58.5	25.36	1.34%	Sand-Slime Tailings	0.059	119.0	0.65	0.18	0.47	1	1.58	19.546	271.68	23.37	26	1.42%	2.5	47%	1.06	0.00	1.06	0	0.94	0.05	0.99	1.0	0.054	38.50	61.87	0.090	1.68	0.96	0.28	0.80	1.13	1.0	0.037	2.86	62.07	0.102	4.42	3.05	2	1.581356	20.123	1.9266	23.372
12.303	5607.30	13.0	0.141	12.6	69.8	30.26	1.09%	Sand-Slime Tailings	0.059	119.0	0.66	0.18	0.48	1	1.57	19.678	273.52	23.65	26	1.14%	2.4	47%	1.07	0.00	1.07	0	0.94	0.05	0.99	1.0	0.053	38.60	62.24	0.090	1.69	0.95	0.28	0.80	1.12	1.0	0.037	2.41	56.98	0.097	4.16	2.93	2	1.567943	20.361	1.9494	23.648
12.467	5607.13	17.3	0.074	17.2	11.4	4.93	0.43%	Sand-Slime Tailings	0.059	119.0	0.67	0.19	0.48	1	1.52	26.200	364.19	30.56	34	0.44%	2.1	47%	1.07	0.00	1.07	0	0.93	0.06	0.99	1.0	0.053	41.02	71.57	0.102	1.91	0.95	0.32	0.80	1.12	1.0	0.037	1.49	45.52	0.088	3.73	2.82	2	1.520626	26.308	2.5188	30.566
12.631	5606.97	14.6	0.118	14.6	12.4	5.38	0.81%	Sand-Slime Tailings	0.059	119.0	0.68	0.19	0.49	1	1.53	22.293	309.87	26.03	29	0.85%	2.3	47%	1.08	0.00	1.08	0	0.93	0.06	0.99	1.0	0.053	39.43	65.46	0.094	1.77	0.95	0.29	0.80	1.12	1.0	0.038	2.00	52.19	0.093	3.92	2.84	2	1.532171	22.412	2.1457	26.030
12.795	5606.80	14.9	0.109	14.7	29.3	12.70	0.73%	Sand-Slime Tailings	0.059	119.0	0.69	0.20	0.49	1	1.52	22.317	310.21	26.24	29	0.77%	2.3	47%	1.09	0.00	1.09	0	0.93	0.06	0.99	1.0	0.053	39.51	65.75	0.094	1.78	0.95	0.30	0.80	1.12	1.0	0.038	1.93	50.67	0.092	3.83	2.81	2	1.520247	22.595	2.1633	26.243
12.959	5606.64	17.4	0.213	17.4	6.0	2.59	1.23%	Sand-Slime Tailings	0.059	119.0	0.70	0.20	0.50	1	1.49	25.878	359.71	30.12	34	1.28%	2.4	47%	1.10	0.00	1.10	0	0.93	0.06	0.99	1.0	0.053	40.87	70.99	0.101	1.90	0.95	0.32	0.80	1.12	1.0	0.038	2.13	64.14	0.105	4.31	3.11	2	1.491547	25.934	2.4829	30.121
13.123	5606.48	11.4	0.174	11.3	13.4	5.82	1.13%	Sand-Slime Tailings	0.059	119.0	0.71	0.21	0.50	1	1.53	17.525	239.81	20.19	21	1.63%	2.6	47%	1.11	0.00	1.11	0	0.93	0.05	0.99	1.0	0.053	37.38	57.57	0.085	1.61	0.95	0.26	0.80	1.11	1.0	0.038	3.18	64.28	0.105	4.28	2.94	2	1.526744	17.38	1.664	20.186
13.287	5606.31	10.3	0.144	10.2	24.0	10.58	1.40%	Sand-Slime Tailings	0.059	119.0	0.72	0.21	0.51	1	1.52	15.385	213.85	18.14	19	1.50%	2.6	47%	1.12	0.00	1.12	0	0.93	0.05	0.99	1.0	0.053	36.66	54.80	0.082	1.56	0.95	0.25	0.80	1.11	1.0	0.038	3.32	60.28	0.100	4.07	2.81	2	1.515783	15.616	1.4951	18.137
13.451	5606.15	8.1	0.085	7.9	29.0	12.57	1.05%	Sand-Slime Tailings	0.059	119.0	0.73	0.22	0.51	1	1.50	11.935	165.89	14.18	14	1.15%	2.6	47%	1.13	0.00	1.13	0	0.93	0.05	0.99	1.0	0.053	35.27	49.45	0.077	1.46	0.95	0.22	0.80	1.11	1.0	0.038	3.59	50.87	0.092	3.71	2.58	2	1.504999	12.207	1.1687	14.178
13.615	5605.98	8.1	0.071	7.9	37.9	16.43	0.88%	Sand-Slime Tailings	0.059	119.0	0.74	0.22	0.52	1	1.49	11.761	163.48	14.07	14	0.96%	2.6	47%	1.14	0.00	1.14	0	0.93	0.05	0.99	1.0	0.053	35.24	49.31	0.077	1.46	0.95	0.22	0.80	1.11	1.0	0.038	3.38	47.57	0.090	3.57	2.51	2	1.494389	12.115	1.1599	14.070
13.779	5605.82	8.4	0.071	8.2	32.9	14.24	0.85%	Sand-Slime Tailings	0.059	119.0	0.75	0.23	0.52	1	1.48	12.139	168.73	14.45	15	0.93%	2.6	47%	1.15	0.00	1.15	0	0.92	0.05	0.99	1.0	0.053	35.37	49.82	0.077	1.47	0.95	0.22	0.80	1.11	1.0	0.038	3.27	47.31	0.089	3.53	2.50	2	1.483948	12.443	1.1913	14.522
13.943	5605.66	8.9	0.054	8.7	37.7	16.35	0.63%	Sand-Slime Tailings	0.059	119.0	0.76	0.23	0.52	1	1.47	12.806	178.01	15.28	16	0.66%	2.5	47%	1.16	0.00	1.16	0	0.92	0.05	0.99	1.0	0.053	35.66	50.94	0.078	1.49	0.95	0.23	0.80	1.10	1.0	0.038	2.79	42.58	0.085	3.35	2.42	2	1.473672	13.153	1.2593	15.277
14.107	5605.49	11.6	0.101	11.4	38.4	16.62	0.87%	Sand-Slime Tailings	0.059	119.0	0.77	0.24	0.53	1	1.46	16.641	231.30	19.73	20	0.93%	2.5	47%	1.17	0.00	1.17	0	0.92	0.05	0.98	1.0	0.052	37.22	56.96	0.085	1.61	0.95	0.26	0.80	1.10	1.0	0.038	2.59	51.19	0.092	3.59	2.60	2	1.463556	16.991	1.6267	19.734
14.271	5605.33	9.4	0.125	9.3	28.4	12.32	1.32%	Sand-Slime Tailings	0.059	119.0	0.78	0.24	0.53	1	1.45	13.475	187.30	15.95	16	1.44%	2.6	47%	1.18	0.00	1.18	0	0.92	0.05	0.98	1.0	0.052	35.90	51.85	0.079	1.51	0.95	0.23	0.80	1.10	1.0	0.038	3.62	51.91	0.098	3.77	2.64	2	1.453597	13.733	1.3148	15.950
14.436	5605.16	8.8	0.126	8.5	40.5	17.53	1.44%	Sand-Slime Tailings	0.059	119.0	0.79	0.25	0.54	1	1.44	12.287	170.78	14.69	15	1.58%	2.7	47%	1.19	0.00	1.19	0	0.92	0.05	0.98	1.0	0.052	35.45	50.15	0.078	1.48	0.95	0.22	0.80	1.10	1.0	0.038	4.01	58.88	0.099	3.78	2.63	2	1.443792	12.651	1.2112	14.694
14.600	5605.00	11.2	0.094	11.1	28.5	12.36	0.84%	Sand-Slime Tailings	0.059	119.0	0.80	0.25	0.54	1	1.43	15.862	220.48	18.72	19	0.90%	2.5	47%	1.20	0.00	1.20	0	0.92	0.05	0.98	1.0	0.052	36.87	55.59	0.083	1.59	0.95	0.25	0.80	1.10	1.0	0.038	2.68	50.09	0.092	3.47	2.53	2	1.434136	16.117	1.543	18.719
14.764	5604.84	15.3	0.076	15.3	10.5	4.53	0.50%	Sand-Slime Tailings	0.059	119.0	0.81	0.26	0.55	1	1.41	21.493	298.76	25.07	27	0.52%	2.3	47%	1.21	0.00	1.21	0	0.92	0.06	0.98	1.0	0.052	39.09	64.16	0.093	1.78	0.95	0.29	0.80	1.09	1.0	0.038	1.80	45.16	0.088	3.29	2.54	2	1.407553	21.585	2.0666	25.070
14.928	5604.67	15.6	0.127	15.5	13.6	5.87	0.81%	Sand-Slime Tailings	0.059	119.0	0.82	0.26	0.55	1	1.40	21.691	301.51	25.33	27	0.86%	2.3	47%	1.22	0.00	1.22	0	0.92	0.06	0.98	1.0	0.052	39.19	64.52	0.093	1.79	0.95	0.29	0.80	1.09	1.0	0.038	2.10	53.28	0.094	3.51	2.65	2	1.397623	21.809	2.088	25.330
15.092	5604.51	13.7	0.155	13.6	16.5	7.13	1.13%	Sand-Slime Tailings	0.059	119.0	0.82	0.27	0.56	1	1.40	19.062	264.96	22.31	23	1.20%	2.5	47%	1.23	0.00	1.23	0	0.91	0.05	0.98	1.0	0.052	38.12	60.43	0.088	1.70	0.95	0.27	0.80	1.09	1.0	0.038	2.64	58.96	0.099	3.66	2.68	2	1.400566	19.206	1.8387	22.306
15.256	5604.34	17.0	0.133	17.0	4.9	2.14	0.78%	Sand-Slime Tailings	0.059	119.0	0.83	0.27	0.56	1	1.37	23.328	324.26	27.14	29	0.82%	2.3	47%	1.24	0.00	1.24	0	0.91	0.06	0.98	1.0	0.052	39.82	66.96	0.096	1.85	0.95	0.30	0.80	1.09	1.0	0.038	1.98	53.66	0.094	3.46	2.66	2	1.373842	23.37	2.2375	27.143
15.420	5604.18	13.1	0.107	13.1	3.5	1.53	0.82%	Sand-Slime Tailings	0.059	119.0	0.84	0.28	0.57	1	1.39	18.162	252.45	21.13	22	0.87%	2.4	47%	1.25	0.00	1.25	0	0.91	0.05	0.98	1.0	0.052	37.71	58.84	0.087	1.68	0.95	0.27	0.80	1.09	1.0	0.038	2.44	51.47	0.093	3.37	2.52	2	1.387455	18.192	1.7417	21.129
15.584	5604.02	9.6	0.107	9.5	9.3	4.03	1.12%	Sand-Slime Tailings	0.059	119.0	0.85	0.28	0.57	1	1.38	13.129	182.50	15.34	15	1.23%	2.6	47%	1.26	0.00	1.26	0	0.91	0.05	0.98	1.0	0.052	35.68	51.02	0.078	1.52	0.95	0.23	0.80	1.09	1.0	0.038	3.54	54.32	0.095	3.43	2.47	2	1.379148	13.209	1.2647	15.342
15.748	5603.85	9.8	0.122	9.7	17.6	7.63	1																																												

WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 2W7-C																											Elev. At Top of Layer (ft)	Elev. At Midpoint of Layer (ft)	Bottom of Layer (ft)	Thickness of Layer (ft)	Unit Weight (pcf)	Unit Weight (pcf)	Stress at Bottom of Layer (tsf)	Stress at Midpoint of Layer (tsf)	Pressure at Bottom of Layer (tsf)	Equil Pore Pressure at Midpoint of Layer (tsf)	Stress at Bottom of Layer (tsf)	Stress at Midpoint of Layer (tsf)														
Data File:	13-52106_SP2W7-C-BSC-CPT										Idriss and Boulanger (2008)					5613.10	Water surface elevation during CPT investigation (ft amsl)					5619.60	Ground Surface Elevation at time of CPT (ft amsl)					FINAL COVER																								
Location:	White Mesa 2013 CPT Investigation										Max. Horiz. Acceleration, Amax/g:					0.15	5611.32	Water surface elevation at t ₀ (ft amsl)					5626.65	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)					Erosion Protection Layer																							
Field Data/2013 Field Investigation/Conotec Data											Earthquake Moment Magnitude, M:					5.5	5595.40	Water surface elevation at t ₁ (ft amsl)					0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement of Final Cover (ft)					5620.65	5626.15					0.50	0.055	110	0.028	0.014	0.00	0.00	0.028	0.014									
Tailings Sands											Magnitude Scaling Factor, MSF:					1.69	5590.40	Water surface elevation at t ₂ (ft amsl)					3.50	Thickness of Water Storage/Rooting Zone Layer (ft)					5620.65	5618.65					4.00	0.060	120	0.454	0.121	0.00	0.00	0.454	0.121									
Tailings Sand-Slimes											Youd et al (2001)												4.00	Thickness of High Compaction Layer (ft)					5620.65	5620.65					4.00	0.060	120	0.454	0.121	0.00	0.00	0.454	0.121									
Tailings Slimes											Max. Horiz. Acceleration, Amax/g:					0.15	1.44	Scaling Factor for stress ratio, r _m					-0.95	Thickness of Random/Platform Fill on on top of existing interim cover (ft)					5619.13	5619.60					-0.95	0.050	101	0.406	0.430	0.00	0.00	0.406	0.430									
Interim Cover											Earthquake Moment Magnitude, M:					5.5	0.47	Volumetric Strain Ratio for Site-Specific Design Earthquake					812.44	Additional Stress due to Final Cover Placement, Δσ _{FC} (psf)					5619.13	5619.60					-0.95	0.050	101	0.406	0.430	0.00	0.00	0.406	0.430									
Cells Requiring User Input/Manipulation											Magnitude Scaling Factor, MSF:					2.21	7.51	Equiv. Number of Uniform Strain Cycles, N					5590.40	Elevation of bottom of tailings (liner) (ft amsl)					5619.13	5619.60					-0.95	0.050	101	0.406	0.430	0.00	0.00	0.406	0.430									
2013 CPT Data from ConeTec											CPT Data Interpretations											Conditions at t ₁				Liquefaction Triggering Analyses											Idriss & Boulanger (2008)															
Depth at time of CPT (ft)	Elevation (ft amsl)	qt	tsf	fs	qc	Pw (u2) (ft)	Pw (u2) (ft)	fs/qt (%)	Material Type (as determined by CPT)	Unit Weight (pcf)	Unit Weight (pcf)	Stress at time of CPT (tsf)	Pore Pressure (tsf)	Effective Stress at time of CPT (tsf)	Saturated at time of CPT 1=Yes 0=No	CN	qc1	tsf	qc1	MPa	qc1N	Normalized Cone Penetration Resistance, R _n	Normalized Friction Ratio, F _n (%)	Type Index, I _c	FC %	Total Stress at t ₁ (tsf)	Pore Pressure at t ₁ (tsf)	Effective Stress at t ₁ (tsf)	Saturated at t ₁ 1=Yes 0=No	Idriss & Boulanger (2008)					Youd et al. (2001)											Idriss & Boulanger (2008)						
																														Cyclic Stress Ratio					Cyclic Resistance Ratio (CRR)					FoS	Cyclic Stress Ratio					CRR					Avg FoS	Liquefiable? 1=Yes 2=No
r _d	C _s	K _s	K _s	CSR	ΔqC _{in}	QC _{in-CS}	M=7.5, s/v=1atm	(CRR)	r _d	D _t	f	K _s	CSR	M=7.5, s/v=1atm	Kc	qc _{in-CS}	(CRR)	M=7.5, s/v=1atm	FoS																																	
24.114	5595.49	13.6	0.288	13.4	40.7	17.61	2.12%		Sand-Slime Tailings	0.059	119.0	1.35	0.55	0.80	1	1.06	14.105	198.06	16.69	15	2.35%	2.8	47%	1.76	0.00	1.76	0	0.84	0.05	0.96	1.0	0.047	36.16	52.85	0.080	1.71	0.92	0.24	0.80	1.01	1.0	0.040	4.66	77.81	0.124	3.27	2.49	2	1.055773	14.373	1.3761	16.694
24.278	5595.32	19.1	0.356	18.5	95.5	41.38	1.87%		Sand-Slime Tailings	0.059	119.0	1.36	0.55	0.81	1	1.05	19.383	269.43	23.24	22	2.01%	2.6	47%	1.77	0.00	1.77	1	0.84	0.05	0.96	1.0	0.047	38.45	61.69	0.090	1.92	0.92	0.28	0.80	1.01	1.0	0.040	3.44	79.99	0.128	3.35	2.63	2	1.050021	20.009	1.9157	23.240
24.442	5595.16	19.8	0.406	19.6	24.9	10.80	2.05%		Sand-Slime Tailings	0.059	119.0	1.37	0.56	0.81	1	1.05	20.495	284.88	23.99	23	2.21%	2.6	47%	1.78	0.01	1.77	1	0.84	0.06	0.96	1.0	0.047	38.72	62.71	0.091	1.94	0.92	0.28	0.80	1.01	1.0	0.040	3.52	84.43	0.136	3.55	2.74	2	1.045128	20.658	1.9778	23.993
24.606	5594.99	17.4	0.456	17.3	12.2	5.27	2.62%		Slime Tailings	0.057	113.1	1.38	0.56	0.82	1	1.04	18.050	250.89	21.06	20	2.85%	2.7	71%	1.79	0.01	1.78	1	0.84	0.05	0.96	1.0	0.047	37.42	58.48	0.086	1.84	0.92	0.26	0.80	1.01	1.0	0.040	4.35	91.61	0.151	3.92	2.88	2	1.042144	18.129	1.7357	21.056
24.770	5594.83	12.0	0.315	11.9	21.2	9.17	2.62%		Slime Tailings	0.057	113.1	1.39	0.57	0.82	1	1.04	12.353	171.70	14.51	13	2.96%	2.9	71%	1.80	0.02	1.78	1	0.84	0.05	0.96	1.0	0.047	35.14	49.65	0.077	1.64	0.92	0.22	0.80	1.01	1.0	0.040	5.71	82.84	0.133	3.42	2.53	2	1.038033	12.49	1.1958	14.506
24.934	5594.67	10.2	0.249	9.9	49.0	21.21	2.45%		Slime Tailings	0.057	113.1	1.40	0.58	0.83	1	1.03	10.195	141.71	12.21	11	2.84%	3.0	71%	1.81	0.02	1.78	1	0.84	0.05	0.97	1.0	0.047	34.34	46.55	0.074	1.57	0.91	0.20	0.80	1.01	1.0	0.040	6.33	77.25	0.123	3.14	2.36	2	1.033939	10.511	1.0063	12.207
25.098	5594.50	10.1	0.244	9.6	79.6	34.51	2.45%		Slime Tailings	0.057	113.1	1.41	0.58	0.83	1	1.03	9.897	137.57	12.09	10	2.81%	3.0	71%	1.82	0.03	1.79	1	0.83	0.05	0.97	1.0	0.047	34.30	46.39	0.074	1.57	0.91	0.20	0.80	1.01	1.0	0.041	6.34	76.70	0.122	3.10	2.33	2	1.029881	10.409	0.9966	12.090
25.262	5594.34	14.2	0.261	14.1	10.4	4.50	1.84%		Sand-Slime Tailings	0.059	119.0	1.42	0.59	0.83	1	1.03	14.489	201.40	16.91	15	2.04%	2.7	47%	1.83	0.03	1.79	1	0.83	0.05	0.96	1.0	0.047	36.23	53.14	0.081	1.71	0.91	0.24	0.80	1.01	1.0	0.041	4.37	73.93	0.118	2.97	2.34	2	1.025398	14.555	1.3935	16.905
25.426	5594.17	14.1	0.415	13.8	52.2	22.60	2.93%		Slime Tailings	0.057	113.1	1.43	0.59	0.84	1	1.02	14.166	196.21	16.78	15	3.26%	2.9	71%	1.83	0.04	1.80	1	0.83	0.05	0.96	1.0	0.047	35.93	52.71	0.080	1.70	0.91	0.24	0.80	1.01	1.0	0.041	5.42	91.00	0.150	3.76	2.73	2	1.021415	14.449	1.3833	16.781
25.590	5594.01	15.1	0.371	15.0	20.2	8.75	2.46%		Slime Tailings	0.057	113.1	1.44	0.60	0.84	1	1.02	15.231	211.72	17.84	16	2.72%	2.8	71%	1.84	0.04	1.80	1	0.83	0.05	0.96	1.0	0.047	36.30	54.14	0.082	1.73	0.91	0.24	0.80	1.00	1.0	0.041	4.79	85.43	0.138	3.44	2.58	2	1.017468	15.36	1.4705	17.839
25.754	5593.85	12.5	0.387	12.0	70.3	30.45	3.10%		Slime Tailings	0.057	113.1	1.45	0.60	0.85	1	1.01	12.203	169.62	14.69	13	3.51%	2.9	71%	1.85	0.05	1.80	1	0.83	0.05	0.96	1.0	0.047	35.20	49.89	0.077	1.63	0.91	0.22	0.80	1.00	1.0	0.041	6.13	90.06	0.148	3.67	2.65	2	1.013556	12.648	1.2109	14.690
25.918	5593.68	15.4	0.224	15.0	51.8	22.46	1.46%		Sand-Slime Tailings	0.059	119.0	1.46	0.61	0.85	1	1.01	15.169	210.85	18.00	16	1.61%	2.7	47%	1.86	0.05	1.81	1	0.83	0.05	0.96	1.0	0.047	36.61	54.61	0.082	1.73	0.91	0.24	0.80	1.00	1.0	0.041	3.79	68.14	0.109	2.69	2.21	2	1.009233	15.495	1.4835	17.997
26.082	5593.52	20.6	0.226	20.5	15.0	6.51	1.10%		Sand-Slime Tailings	0.059	119.0	1.47	0.61	0.86	1	1.00	20.609	286.46	24.05	22	1.18%	2.5	47%	1.87	0.06	1.81	1	0.83	0.06	0.96	1.0	0.047	38.73	62.78	0.091	1.92	0.90	0.28	0.80	1.00	1.0	0.041	2.68	64.55	0.105	2.57	2.25	2	1.004823	20.703	1.9821	24.046
26.246	5593.35	17.9	0.228	17.7	30.6	13.24	1.27%		Sand-Slime Tailings	0.059	119.0	1.48	0.62	0.86	1	1.00	17.733	246.48	20.82	19	1.39%	2.6	47%	1.88	0.06	1.82	1	0.82	0.05	0.96	1.0	0.047	37.60	58.42	0.086	1.82	0.90	0.26	0.80	1.00	1.0	0.041	3.20	66.52	0.107	2.61	2.21	2	1.000711	17.924	1.716	20.817
26.410	5593.19	13.3	0.303	13.1	41.9	18.16	2.27%		Slime Tailings	0.057	113.1	1.49	0.62	0.86	1	1.00	13.030	181.12	15.44	14	2.56%	2.8	71%	1.89	0.07	1.82	1	0.82	0.05	0.96	1.0	0.048	35.46	50.90	0.078	1.65	0.90	0.23	0.80	1.00	1.0	0.041	5.18	79.94	0.128	3.08	2.36	2	0.996943	13.291	1.2725	15.437
26.574	5593.03	12.3	0.204	11.9	75.2	32.58	1.65%		Sand-Slime Tailings	0.059	119.0	1.50	0.63	0.87	1	0.99	11.774	163.66	14.22	12	1.88%	2.8	47%	1.90	0.07	1.83	1	0.82	0.05	0.96	1.0	0.048	35.29	49.50	0.077	1.62	0.90	0.22	0.80	1.00	1.0	0.041	4.83	68.70	0.110	2.64	2.13	2	0.99278	12.24	1.1719	14.216
26.739	5592.86	21.0	0.154	20.8	25.1	10.86	0.73%		Sand-Slime Tailings	0.059	119.0	1.51	0.63	0.87	1	0.99	20.610	286.48	24.12	22	0.79%	2.4	47%	1.91	0.08	1.83	1	0.82	0.06	0.96	1.0	0.047	38.76	62.88	0.091	1.92	0.90	0.28	0.80	1.00	1.0	0.041	2.30	55.56	0.09854	2.29	2.10	2	0.988954	20.765	1.988	24.117
26.903	5592.70	21.7	0.157	21.6	16.8	7.20	0.72%		Sand-Slime Tailings	0.059	119.0	1.51	0.64	0.88	1	0.99	21.287	295.89	24.84	23	0.78%	2.4	47%	1.92	0.08	1.84	1	0.82	0.06	0.96	1.0	0.047	39.01	63.86	0.092	1.94	0.90	0.29	0.80	1.00	1.0	0.042	2.24	55.75	0.096	2.28	2.11	2	0.985064	21.389	2.0478	24.842
27.067	5592.53	21.5	0.222	21.4	21.0	9.11	1.03%		Sand-Slime Tailings	0.059	119.0	1.52	0.64	0.88	1	0.98	20.946	291.15	24.48	23	1.11%	2.5	47%	1.93	0.09	1.84	1	0.82	0.06	0.96	1.0	0.047	38.89	63.36	0.092	1.93	0.90	0.29	0.80	0.99	1.0	0.042	2.60	63.68	0.104	2.45	2.19	2	0.981089	21.075	2.0177	24.477
27.231	5592.37	20.3	0.256	20.2	23.1	10.02	1.26%		Sand-Slime Tailings	0.059	119.0	1.53	0.65	0.89	1	0.98	19.734	274.30	23.08	21	1.36%	2.5	47%	1.94	0.09	1.85	1	0.82	0.05	0.96	1.0	0.048	38.40	61.48	0.090																	

WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 2E1																									Elev. at Top of Layer (ft)	Elev. At Midpoint of Layer (ft)	Bottom of Layer (ft)	Thicknes s of Layer (ft)	Unit Weigh t (pcf)	Unit Weight (pcf)	Stress at Bottom of Layer (tsf)	Stress at Midpoint of Layer (tsf)	Pressure at Bottom of Layer (tsf)	Equil Pore Pressure at Midpoint of Layer (tsf)	Stress at Bottom of Layer (tsf)	Stress at Midpoint of Layer (tsf)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									
Data File: 13-52106_SP2E1-BSC-CPT		Idriss and Boulanger (2008)				5613.10				Water surface elevation during CPT investigation (ft amsl)				5619.95				Ground Surface Elevation at time of CPT (ft amsl)				FINAL COVER				Erosion Protection Layer				5630.21				5629.96				0.50				0.055				110				0.028				0.014				0.00				0.00				0.028				0.014																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							
Location: White Mesa 2013 CPT Investigation		Max. Horiz. Acceleration, Amax/g: 0.15				5611.67				Water surface elevation at t0 (ft amsl)				5630.46				Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)				ater Storage/Rooting Zone Layer				5628.21				5626.46				3.50				0.054				107				0.215				0.121				0.00				0.00				0.215				0.121																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
Field Data(2013 Field Investigation)/ConeTec Data		Earthquake Moment Magnitude, M: 5.5				5595.46				Water surface elevation at t1 (ft amsl)				0.50				Thickness of Erosion Protection Layer (rock mulch/topsoils) immediately after placement of Final Cover (ft)				High Compaction Layer				5624.46				5622.46				4.00				0.060				120				0.454				0.334				0.00				0.00				0.454				0.334																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
Tailings Sands		Magnitude Scaling Factor, MSF: 1.69				5590.46				Water surface elevation at t2 (ft amsl)				4.00				Thickness of High Compaction Layer (ft)				Platform/Random Fill Layer				5621.21				5619.95				2.51				0.050				101				0.580				0.517				0.00				0.00				0.580				0.517																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
Tailings Sand-Slimes		Youd, et al (2001)				1.44				Scaling Factor for stress ratio, r_m				2.51				Thickness of Random/Platform Fill on on top of existing interim cover (ft)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																								</			

WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 2E1																									Elev. at Top of Layer (ft)	Elev. at Midpoint of Layer (ft)	Bottom of Layer (ft)	Thicknes s of Layer (ft)	Unit Weigh t (pcf)	Unit Weight (pcf)	Stress at Bottom of Layer (tsf)	Stress at Midpoint of Layer (tsf)	Pressure at Bottom of Layer (tsf)	Equil Pressure at Midpoint of Layer (tsf)	Stress at Bottom of Layer (tsf)	Stress at Midpoint of Layer (tsf)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							
Data File: 13-52106_SP2E1-BSC-CPT		Idriss and Boulanger (2008)				5613.10				Water surface elevation during CPT investigation (ft amsl)				5619.95				Ground Surface Elevation at time of CPT (ft amsl)				FINAL COVER																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					</

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WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 3-1S																									Elev. at Top of Layer (ft)	Elev. At Midpoint of Layer (ft)	Bottom of Layer (ft)	Thickness of Layer (ft)	Unit Weight (pcf)	Unit Weight (pcf)	Stress at Bottom of Layer (tsf)	Stress at Midpoint of Layer (tsf)	Pressure at Bottom of Layer (tsf)	Equil Pore Pressure at Midpoint of Layer (tsf)	Stress at Bottom of Layer (tsf)	Stress at Midpoint of Layer (tsf)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
Data File: 13-52106_SP3-IS-BSC-CPT		Idriss and Boulanger (2008)		5608.00		Water surface elevation during CPT investigation (ft)		5612.56		Ground Surface Elevation at time of CPT (ft amsl)		FINAL COVER																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																												
Location: White Mesa 2013 CPT Investigation		Max. Horiz. Acceleration, Amax/g: 0.15		5604.28		Water surface elevation at t ₀ (ft amsl)		5620.47		Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)		Erosion Protection Layer ##### 5620.22 5619.97 0.50 0.055 110 0.028 0.014 0.00 0.00 0.028 0.014																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																												
Field Data\2013 Field Investigation\Conotec Data		Earthquake Moment Magnitude, M: 5.5		5595.59		Water surface elevation at t ₁ (ft amsl)		0.50		Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement of Final Cover (ft)		ater Storage/Rooting Zone Layer ##### 5618.22 5616.47 3.50 0.054 107 0.215 0.121 0.00 0.00 0.215 0.121																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																												
Tailings Sands		Magnitude Scaling Factor, MSF: 1.69		5590.59		Water surface elevation at t ₂ (ft amsl)		3.50		Thickness of Water Storage/Rooting Zone (ft)		High Compaction Layer ##### 5614.72 5612.97 3.50 0.060 120 0.424 0.320 0.00 0.00 0.424 0.320																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																												
Tailings Sand-Slimes		Youd, et al (2001)						3.50		Thickness of High Compaction Layer (ft)		Platform/Random Fill Layer ##### 5612.77 5612.56 0.41 0.050 101 0.445 0.434 0.00 0.00 0.445 0.434																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																												
Tailings Slimes		Max. Horiz. Acceleration, Amax/g: 0.15		1.44		Scaling Factor for stress ratio, r _m		0.41		Thickness of Random/Platform Fill on on top of existing interim cover (ft)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
Interim Cover		Earthquake Moment Magnitude, M: 5.5		0.47		Volumetric Strain Ratio for Site-Specific Design Earthquake, Δσ _{rvc} (psf)		887.10		Additional Stress due to Final Cover Placement, Δσ _{rvc} (psf)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
Cells Requiring User Input/Manipulation		Magnitude Scaling Factor, MSF: 2.21		7.51		Equiv. Number of Uniform Strain Cycles, N		5590.59		Elevation of bottom of tailings (liner) (ft amsl)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
2013 CPT Data from ConeTec										CPT Data Interpretations										Conditions at t _i										Liquefaction Triggering Analyses										Idriss & Boulanger (2008)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																
Depth at time of CPT (ft)		Elevation (ft amsl)		qt	fs	qc	Pw (u2) PSI	Pw (u2) fs/(%)	Material Type (as determined by user)	Unit Weight (pcf)	Unit Weight of CPT (pcf)	Total Stress at time of CPT (tsf)	Pore Pressure at time of CPT (tsf)	Effective Stress at time of CPT (tsf)	Saturated at time of CPT 1=Yes 0=No	CN	qc1 TSF	qc1 MPa	qc1N	Normalized Cone Penetration Resistance, q _c	Normalized Friction Ratio, F _r (%)	Type Index, I _t	FC %	Total Stress at t _i (tsf)	Pore Pressure at t _i (tsf)	Effective Stress at t _i (tsf)	Saturated at t _i 1=Yes 0=No	Cyclic Stress Ratio				Cyclic Resistance Ratio (CRR)				Cyclic Stress Ratio				Cyclic Resistance Ratio (CRR)				Avg FoS	Liquefiable? 1=Yes 2=No	CN	qc1 TSF	qc1 MPa	qc1N																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							
r _d	C _s	K _v	K _a	CSR	Δqc _{in}	qC _{in-CS}	(CRR)	FoS	r _d	D _r	f	K _v	K _a	CSR	Kc	qC _{in-CS}	(CRR)	FoS																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																						

WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 3-1S																																																				
Data File: 13-52106_SP3-1S-BSC-CPT		Idriss and Boulanger (2008)					5608.00					5612.56					Ground Surface Elevation at time of CPT (ft amsl)																																			
Location: White Mesa 2013 CPT Investigation		Max. Horiz. Acceleration, Amax/g: 0.15					5604.28					5620.47					Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)					FINAL COVER																														
J.V.V.16.2.3 Field Data\2013 Field Investigation\Conetec Data		Earthquake Moment Magnitude, M: 5.5					5595.59					0.50					Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement of Final Cover (ft)					Erosion Protection Layer																														
Tailings Sands		Magnitude Scaling Factor, MSF: 1.69					5590.59					3.50					Thickness of Water Storage/Rooting Zone (ft)					Water Storage/Rooting Zone Layer																														
Tailings Sand-Slimes		Youd, et al (2001)										3.50					Thickness of High Compaction Layer (ft)					High Compaction Layer																														
Tailings Slimes		Max. Horiz. Acceleration, Amax/g: 0.15					1.44					0.41					Thickness of Random/Platform Fill on or on top of existing interim cover (ft)					Platform/Random Fill Layer																														
Interim Cover		Earthquake Moment Magnitude, M: 5.5					0.47					887.10					Additional Stress due to Final Cover Placement, Δσ _{FC} (psf)																																			
Cells Requiring User Input/Manipulation		Magnitude Scaling Factor, MSF: 2.21					7.51					5590.59					Elevation of bottom of tailings (liner) (ft amsl)																																			
2013 CPT Data from ConeTec										CPT Data Interpretations										Conditions at t _i										Liquefaction Triggering Analyses										Idriss & Boulanger (2008)												
Depth at time of CPT (ft)	Elevation (ft amsl)	qt	fs	qc	Pw (u2)	Pw (u2)	fs/qt	Material Type (as determined by fines)	Unit Weight (pcf)	Unit Weight (pcf)	Stress at time of CPT (tsf)	Pore Pressure at time of CPT (tsf)	Effective Stress at time of CPT (tsf)	Saturated at time of CPT 1=Yes 0=No	CN	qc1	qc1	qc1N	Normalized Cone Penetration Resistance, q _{c1}	Normalized Friction Ratio, F _r (%)	Type Index, I _c	FC %	Total Stress at t _i (tsf)	Pore Pressure at t _i (tsf)	Effective Stress at t _i (tsf)	Saturated at t _i 1=Yes 0=No	Idriss & Boulanger (2008)										Youd et al. (2001)										Avg FoS	Liquefiable? 1=Yes 2=No	CN	qc1	qc1	qc1N
																											Cyclic Stress Ratio					Cyclic Resistance Ratio (CRR)					Cyclic Stress Ratio															
r _d	C _o	K _o	K _s	CSR	Δqc _{in}	qc _{in-cs}	M=7.5, s/v=latm	FoS	r _d	D _r	f	K _o	K _s	CSR	Kc	qc _{in-cs}	M=7.5, s/v=latm	FoS	r _d	D _r	f	K _o	K _s	CSR	Kc	qc _{in-cs}	M=7.5, s/v=latm	FoS																								
12.139	5600.42	9.7	0.064	9.4	51.9	22.49	0.66%	Sand-Slime Tailin	0.059	119.0	0.68	0.24	0.44	1	1.69	15.804	219.68	18.99	20	0.71%	2.4	47%	1.12	0.00	1.12	0	0.94	0.05	0.99	1.0	0.053	36.96	55.95	0.083	1.56	0.95	0.25	0.80	1.14	1.0	0.037	2.36	44.75	0.087	4.06	2.81	2	1.688489	16.351	1.5655	18.991	
12.303	5600.26	11.1	0.121	10.7	65.5	28.37	1.09%	Sand-Slime Tailin	0.059	119.0	0.69	0.24	0.45	1	1.67	17.874	248.45	21.55	23	1.16%	2.5	47%	1.13	0.00	1.13	0	0.94	0.05	0.99	1.0	0.053	37.86	59.41	0.087	1.64	0.95	0.27	0.80	1.14	1.0	0.037	2.59	55.72	0.096	4.42	3.03	2	1.670492	18.557	1.7766	21.553	
12.467	5600.09	16.8	0.110	16.4	67.8	29.38	0.66%	Sand-Slime Tailin	0.059	119.0	0.70	0.25	0.45	1	1.60	26.138	363.32	31.14	36	0.68%	2.2	47%	1.14	0.00	1.14	0	0.93	0.06	0.98	1.0	0.053	41.22	72.37	0.103	1.93	0.95	0.32	0.80	1.14	1.0	0.037	1.64	50.96	0.092	4.21	3.07	2	1.596709	26.814	2.5672	31.143	
12.631	5599.93	30.9	0.086	30.8	23.6	10.23	0.28%	Sand Tailings	0.062	123.5	0.71	0.25	0.45	1	1.49	45.876	637.67	53.54	66	0.28%	1.8	18%	1.15	0.00	1.15	0	0.93	0.07	0.98	1.0	0.053	35.78	89.31	0.126	2.39	0.95	0.42	0.79	1.14	1.0	0.037	1.09	58.49	0.099	4.45	3.42	2	1.490923	46.095	4.4132	53.537	
12.795	5599.76	30.6	0.167	30.5	23.2	10.07	0.55%	Sand-Slime Tailin	0.059	119.0	0.72	0.26	0.46	1	1.48	45.191	628.16	52.74	65	0.56%	1.9	47%	1.16	0.00	1.16	0	0.93	0.07	0.98	1.0	0.053	48.80	101.53	0.145	2.75	0.95	0.42	0.79	1.14	1.0	0.037	1.21	63.65	0.104	4.64	3.70	2	1.484114	45.406	4.3472	52.737	
12.959	5599.60	24.9	0.293	24.8	9.7	4.19	1.18%	Sand-Slime Tailin	0.059	119.0	0.73	0.26	0.46	1	1.51	37.430	520.28	43.58	52	1.21%	2.2	47%	1.17	0.00	1.17	0	0.93	0.07	0.98	1.0	0.053	45.59	89.16	0.126	2.39	0.95	0.38	0.80	1.13	1.0	0.037	1.63	71.04	0.113	5.01	3.70	2	1.506858	37.521	3.5923	43.579	
13.123	5599.44	22.1	0.250	22.0	13.6	5.90	1.13%	Sand-Slime Tailin	0.059	119.0	0.74	0.27	0.47	1	1.52	33.392	464.15	38.93	46	1.17%	2.2	47%	1.18	0.00	1.18	0	0.93	0.06	0.98	1.0	0.053	43.96	82.89	0.117	2.22	0.95	0.36	0.80	1.13	1.0	0.037	1.72	67.05	0.108	4.73	3.47	2	1.515057	33.521	3.2093	38.932	
13.287	5599.27	17.9	0.174	17.8	18.4	7.98	0.97%	Sand-Slime Tailin	0.059	119.0	0.75	0.27	0.47	1	1.54	27.284	379.25	31.89	36	1.02%	2.3	47%	1.19	0.00	1.19	0	0.93	0.06	0.98	1.0	0.053	41.49	73.38	0.104	1.97	0.95	0.33	0.80	1.13	1.0	0.037	1.86	59.29	0.099	4.31	3.14	2	1.535421	27.461	2.6291	31.894	
13.451	5599.11	18.6	0.120	18.3	33.7	14.61	0.65%	Sand-Slime Tailin	0.059	119.0	0.76	0.28	0.48	1	1.52	27.891	387.68	32.76	37	0.67%	2.2	47%	1.20	0.00	1.20	0	0.93	0.06	0.98	1.0	0.052	41.79	74.56	0.105	2.01	0.95	0.33	0.80	1.12	1.0	0.037	1.60	52.27	0.093	4.01	3.01	2	1.520751	28.211	2.7009	32.765	
13.615	5598.94	19.0	0.093	18.8	27.6	11.94	0.49%	Sand-Slime Tailin	0.059	119.0	0.77	0.28	0.48	1	1.51	28.342	393.95	33.22	38	0.51%	2.1	47%	1.21	0.00	1.21	0	0.93	0.06	0.98	1.0	0.052	41.95	75.17	0.106	2.03	0.95	0.33	0.80	1.12	1.0	0.037	1.47	48.88	0.091	3.86	2.95	2	1.508334	28.601	2.7383	33.218	
13.779	5598.78	18.8	0.035	18.6	24.7	10.70	0.19%	Sand-Slime Tailin	0.059	119.0	0.77	0.29	0.49	1	1.50	27.908	387.92	32.68	37	0.19%	2.0	47%	1.22	0.00	1.22	0	0.92	0.06	0.98	1.0	0.052	41.76	74.45	0.105	2.01	0.95	0.33	0.80	1.12	1.0	0.037	1.26	41.27	0.084	3.56	2.79	2	1.500419	28.139	2.694	32.682	
13.943	5598.62	17.5	0.045	17.4	14.9	6.47	0.26%	Sand-Slime Tailin	0.059	119.0	0.78	0.29	0.49	1	1.50	26.084	362.57	30.46	34	0.27%	2.0	47%	1.23	0.00	1.23	0	0.92	0.06	0.98	1.0	0.052	40.98	71.44	0.101	1.94	0.95	0.32	0.80	1.12	1.0	0.037	1.36	41.55	0.085	3.54	2.74	2	1.499961	26.224	2.5107	30.458	
14.107	5598.45	15.4	0.100	15.2	27.0	11.68	0.65%	Sand-Slime Tailin	0.059	119.0	0.79	0.30	0.50	1	1.51	22.922	318.61	26.92	29	0.69%	2.3	47%	1.24	0.00	1.24	0	0.92	0.06	0.98	1.0	0.052	39.74	66.66	0.096	1.83	0.95	0.30	0.80	1.12	1.0	0.037	1.84	49.42	0.091	3.78	2.80	2	1.506034	23.175	2.2188	26.917	
14.271	5598.29	16.8	0.261	16.6	35.9	15.54	1.55%	Sand-Slime Tailin	0.059	119.0	0.80	0.30	0.50	1	1.49	24.694	343.25	29.07	32	1.63%	2.4	47%	1.25	0.00	1.25	0	0.92	0.06	0.98	1.0	0.052	40.50	69.56	0.099	1.90	0.95	0.31	0.80	1.11	1.0	0.038	2.44	71.02	0.113	4.66	3.28	2	1.485827	25.027	2.3961	29.068	
14.436	5598.12	15.9	0.208	15.7	41.2	17.86	1.31%	Sand-Slime Tailin	0.059	119.0	0.81	0.31	0.51	1	1.48	23.240	323.03	27.43	30	1.38%	2.4	47%	1.26	0.00	1.26	0	0.92	0.06	0.98	1.0	0.052	39.92	67.36	0.096	1.85	0.95	0.30	0.80	1.11	1.0	0.038	2.37	64.97	0.106	4.30	3.07	2	1.483063	23.621	2.2615	27.435	
14.600	5597.96	17.8	0.165	17.6	26.3	11.41	0.93%	Sand-Slime Tailin	0.059	119.0	0.82	0.31	0.51	1	1.46	25.776	358.29	30.22	33	0.97%	2.3	47%	1.27	0.00	1.27	0	0.92	0.06	0.98	1.0	0.052	40.90	71.12	0.101	1.95	0.95	0.32	0.80	1.11	1.0	0.038	1.92	58.11	0.098	3.97	2.96	2	1.461241	26.017	2.4908	30.217	
14.764	5597.80	15.1	0.105	15.0	29.7	12.88	0.69%	Sand-Slime Tailin	0.059	119.0	0.83	0.32	0.52	1	1.47	21.980	305.52	25.85	28	0.73%	2.3	47%	1.28	0.00	1.28	0	0.92	0.06	0.98	1.0	0.052	39.37	65.21	0.094	1.81	0.95	0.29	0.80	1.11	1.0	0.038	1.95	50.29	0.092	3.68	2.74	2	1.470246	26.251	2.1305	25.846	
14.928	5597.63	16.4	0.396	16.2	36.8	15.96	2.41%	Sand-Slime Tailin	0.059	119.0	0.84	0.32	0.52	1	1.45	23.488	326.48	27.67	30	2.55%	2.6	47%	1.29	0.00	1.29	0	0.92	0.06	0.98	1.0	0.052	40.00	67.67	0.097	1.87	0.95	0.30	0.80	1.11	1.0	0.038	1.16	87.53	0.142	5.65	3.76	2	1.45225	23.822	2.2807	27.667	
15.092	5597.47	15.6	0.201	15.3	59.5	25.80	1.29%	Sand-Slime Tailin	0.059	119.0	0.85	0.33	0.52	1	1.45	22.121	307.48	26.32	28	1.36%	2.4	47%	1.30	0.00	1.30	0	0.91	0.06	0.98	1.0	0.052	39.53	65.85	0.095	1.83	0.95	0.30	0.80	1.10	1.0	0.038	2.44	64.33	0.105	4.12	2.98	2	1.448658	22.659	2.1694	26.317	
15.256	5597.30	25.6	0.270	25.4	23.7	10.26	1.06%	Sand-Slime Tailin	0.059	119.0	0.86	0.33	0.53	1	1.39	35.271	490.27	41.20	47	1.09%	2.2	47%	1.31	0.00	1.31	0	0.91	0.07	0.97	1.0	0.051	44.75	85.96	0.121	2.36	0.95	0.37	0.80	1.10	1.0	0.038	1.66	68.40	0.110	4.28	3.32	2	1.388093	35.477	3.3965	41.204	
15.420	5597.14	21.4	0.308	21.3	15.0	6.48	1.44%	Sand-Slime Tailin	0.059	119.0	0.87	0.34	0.53	1	1.40	29.754	413.58	34.71	38	1.50%	2.3	47%	1.32	0.00	1.32	0	0.91	0.06	0.97	1.0	0.051	42.47	77.18	0.109	2.12	0.95	0.34	0.80	1.10	1.0	0.038	2.11	73.21	0.116	4.51	3.31	2	1.399511	29.884	2.8611	34.709	
15.584	5596.98	18.6	0.188	18.7	18.8	8.16	1.00%	Sand-Slime Tailin	0.059	119.0	0.88	0.34	0.54	1	1.40	26.274	365.21	30.71	33	1.05%	2.3	47%	1.33	0.00	1.33	0	0.91	0.06	0.97	1.0	0.051	41.07	71.78	0.102	1.98	0.																

WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 3-2C									
Data File: Location: Field Data Tailings Sands Tailings Sand-Slimes Tailings Slimes Interim Cover Cells Requiring User Input/Manipulation	13-52106_SP3-2C-BSC-CPT	Idriss and Boulanger (2008)			5605.30	Water surface elevation during CPT investigation (ft)	5610.82	Ground Surface Elevation at time of investigation	
	White Mesa 2013 CPT Investigation	Max. Horiz. Acceleration, Amax/g:	0.15	5602.54	Water surface elevation at t0 (ft amsl)	5621.51	Ground Surface Elevation Immersed		
	Field Data/2013 Field Investigation/Conotec Data	Earthquake Moment Magnitude, M:	5.5	5591.64	Water surface elevation at t1 (ft amsl)	0.50	Thickness of Erosion Protection/Reinforcement		
		Magnitude Scaling Factor, MSF:	1.69	5586.64	Water surface elevation at t2 (ft amsl)	3.50	Thickness of Water Storage/Release		
		Youd, et al (2001)				3.50	Thickness of High Compaction		
		Max. Horiz. Acceleration, Amax/g:	0.15	1.44	Scaling Factor for stress ratio, r_m	3.19	Thickness of Random/Platform		
		Earthquake Moment Magnitude, M:	5.5	0.47	Volumetric Strain Ratio for Site-Specific Design Earthquake	1167.12	Additional Stress due to Final CPT		
		Magnitude Scaling Factor, MSF:	2.21	7.51	Equiv. Number of Uniform Strain Cycles, N	5586.64	Elevation of bottom of tailings		

Liquef_SeismicSettle_30Aug2015.xls

WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 3-3S																									Elev. at Top of Layer (ft)	Elev. at Midpoint of Layer (ft)	Bottom of Layer (ft)	Thicknes s of Layer (ft)	Unit Weigh t (pcf)	Unit Weight (pcf)	Stress at Bottom of Layer (tsf)	Stress at Midpoint of Layer (tsf)	Pressure at Bottom of Layer (tsf)	Equil Pore Pressure at Midpoint of Layer (tsf)	Stress at Bottom of Layer (tsf)	Stress at Midpoint of Layer (tsf)																		
Data File: 13-52106_SP3-3S-BSC-CPT		Idriss and Boulanger (2008)					5605.60					5609.63					5620.49					FINAL COVER					Erosion Protection Layer					Water Storage/Rooting Zone Layer					High Compaction Layer					Platform/Random Fill Layer												
Location: White Mesa 2013 CPT Investigation		Max. Horiz. Acceleration, Amax/g: 0.15					5601.35					5620.49					Ground Surface Elevation at time of CPT (ft amsl)					Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)																																
3-3S Field Data/2013 Field Investigation/ConeTec Data		Earthquake Moment Magnitude, M: 5.5					5582.14					0.50					Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement of Final Cover (ft)																																					
Tailings Sands		Magnitude Scaling Factor, MSF: 1.69					5577.14					3.50					Thickness of Water Storage/Rooting Zone (ft)																																					
Tailings Sand-Slimes		Youd, et al (2001)					1.44					3.36					Thickness of High Compaction Layer (ft)																																					
Tailings Slimes		Max. Horiz. Acceleration, Amax/g: 0.15					0.47					1184.24					Thickness of Random/Platform Fill on on top of existing interim cover (ft)																																					
Interim Cover		Earthquake Moment Magnitude, M: 5.5					7.51					5577.14					Elevation of bottom of Final Cover Placement, Δσ _{FC} (psf)																																					
Cells Requiring User Input/Manipulation		Magnitude Scaling Factor, MSF: 2.21																																																				
2013 CPT Data from ConeTec															CPT Data Interpretations										Conditions at t _i										Liquefaction Triggering Analyses										Idriss & Boulanger (2008)									
Depth at time of CPT (ft)	Elevation (ft amsl)	tsf	fs	qc	Pw (u2) (ft)	Pw (u2) (psi)	fs/qc (%)	Material Type (as determined by user)	Unit Weight (pcf)	Unit Weight (pcf)	Stress at time of CPT (tsf)	Pore Pressure at time of CPT (tsf)	Effective Stress at time of CPT (tsf)	Saturated at time of CPT 1=Yes 0=No	CN	qc1 TSF	qc1 MPa	qc1N	Normalized Cone Penetration Resistance, q _c	Normalized Friction Ratio, F _r (%)	Type Index, I _c	FC %	Total Stress at t _i (tsf)	Pore Pressure at t _i (tsf)	Effective Stress at t _i (tsf)	Saturated at t _i 1=Yes 0=No	Cyclic Stress Ratio					Cyclic Resistance Ratio (CRR)					Cyclic Stress Ratio					CRR					Avg FoS	Liquefiable? 1=Yes 2=No	CN	qc1 TSF	qc1 MPa	qc1N		
																											r _d	C _o	K _o	K _a	Δqc _{in}	qc _{in}	M=7.5, s/v=1atm	FoS	r _d	D _r	f	K _o	K _a	CSR	Kc	qc _C (tsf)	M=7.5, s/v=1atm	FoS										
0.164	5609.47	13.9	0.034	13.9	1.5	0.64	0.25%	Interim Cover	0.050	100.7	0.01	0.00	0.01	0	1.70	23.545	327.28	27.36	1677	0.25%	0.7	51%	0.60	0.00	0.60	0	1.00	0.06	1.02	1.0	0.059	39.92	67.29	0.096	1.63	0.97	0.30	0.80	2.53	1.0	0.017	1.00	27.36	0.073	176.61	89.12	2	1.7	23.561	2.2557	27.364			
0.328	5609.30	18.4	0.072	18.4	2.3	1.01	0.39%	Interim Cover	0.050	100.7	0.02	0.00	0.02	0	1.70	31.246	434.32	36.32	1112	0.39%	0.9	51%	0.61	0.00	0.61	0	1.00	0.06	1.02	1.0	0.059	43.07	79.38	0.112	1.89	0.97	0.35	0.80	2.20	1.0	0.019	1.00	36.32	0.080	97.39	49.64	2	1.7	31.271	2.9938	36.319			
0.492	5609.14	58.6	0.077	58.5	4.8	2.06	0.13%	Interim Cover	0.050	100.7	0.02	0.00	0.02	0	1.70	99.501	1383.06	115.62	2362	0.13%	0.4	51%	0.62	0.00	0.62	0	1.00	0.12	1.04	1.0	0.060	70.90	186.52	0.662	11.01	0.97	0.62	0.69	3.01	1.0	0.014	1.00	115.62	0.224	181.10	96.05	2	1.7	99.552	9.5311	115.623			
0.656	5608.97	73.3	0.296	73.3	3.9	1.68	0.40%	Interim Cover	0.050	100.7	0.03	0.00	0.03	0	1.70	124.644	1732.55	144.81	2218	0.40%	0.8	51%	0.63	0.00	0.63	0	1.00	0.15	1.05	1.0	0.061	81.14	225.95	1.000	16.49	0.97	0.69	0.65	3.10	1.0	0.014	1.00	144.81	0.362	220.09	118.29	2	1.7	124.69	11.937	144.814			
0.820	5608.81	81.4	0.267	81.4	3.7	1.62	0.33%	Interim Cover	0.050	100.7	0.04	0.00	0.04	0	1.70	138.414	1923.95	160.81	1971	0.33%	0.8	51%	0.63	0.00	0.63	0	1.00	0.18	1.05	1.0	0.061	86.75	247.56	1.000	16.41	0.97	0.73	0.63	3.04	1.0	0.014	1.00	160.81	1.000	486.00	251.21	2	1.7	138.45	13.256	160.805			
0.984	5608.65	84.2	0.326	84.2	3.9	1.68	0.39%	Interim Cover	0.050	100.7	0.05	0.00	0.05	0	1.70	143.072	1988.70	166.22	1697	0.39%	0.8	51%	0.64	0.00	0.64	0	1.00	0.19	1.05	1.0	0.061	88.65	254.87	1.000	16.41	0.97	0.74	0.63	2.89	1.0	0.015	1.00	166.22	1.000	405.16	210.78	2	1.7	143.11	13.702	166.217			
1.148	5608.48	84.7	0.187	84.7	2.9	1.27	0.22%	Interim Cover	0.050	100.7	0.06	0.00	0.06	0	1.70	143.939	2000.75	167.21	1463	0.22%	0.6	51%	0.65	0.00	0.65	0	1.00	0.19	1.05	1.0	0.061	89.00	256.21	1.000	16.43	0.97	0.75	0.63	2.74	1.0	0.016	1.00	167.21	1.000	347.42	181.93	2	1.7	143.97	13.784	167.213			
1.312	5608.32	73.0	0.231	72.9	3.0	1.31	0.32%	Interim Cover	0.050	100.7	0.07	0.00	0.07	0	1.70	123.998	1723.57	144.05	1103	0.32%	0.8	51%	0.66	0.00	0.66	0	1.00	0.15	1.04	1.0	0.060	80.87	224.93	1.000	16.62	0.97	0.69	0.65	2.43	1.0	0.018	1.00	144.05	0.358	108.87	62.75	2	1.7	124.03	11.875	144.054			
1.476	5608.15	71.2	0.308	71.2	1.7	0.72	0.43%	Interim Cover	0.050	100.7	0.07	0.00	0.07	0	1.70	120.955	1681.27	140.50	956	0.43%	1.0	51%	0.67	0.00	0.67	0	1.00	0.15	1.04	1.0	0.060	79.63	220.13	1.000	16.67	0.97	0.68	0.66	2.31	1.0	0.019	1.00	140.50	0.338	91.39	54.03	2	1.7	120.97	11.582	140.503			
1.640	5607.99	55.2	0.236	55.2	3.7	1.59	0.43%	Interim Cover	0.050	100.7	0.08	0.00	0.08	0	1.70	93.772	1303.43	108.96	667	0.43%	1.1	51%	0.67	0.00	0.67	0	1.00	0.11	1.03	1.0	0.059	68.56	177.51	0.498	8.38	0.97	0.60	0.70	2.03	1.0	0.021	1.00	108.96	0.200	48.77	28.57	2	1.7	93.811	8.9815	108.956			
1.804	5607.83	55.4	0.150	55.4	1.9	0.82	0.27%	Interim Cover	0.050	100.7	0.09	0.00	0.09	0	1.70	94.095	1307.92	109.31	608	0.27%	0.9	51%	0.68	0.00	0.68	0	1.00	0.11	1.03	1.0	0.059	68.68	177.99	0.505	8.50	0.97	0.60	0.70	1.97	1.0	0.022	1.00	109.31	0.201	44.61	26.56	2	1.7	94.115	9.0106	109.309			
1.968	5607.66	54.7	0.208	54.7	1.6	0.70	0.38%	Interim Cover	0.050	100.7	0.10	0.00	0.10	0	1.70	92.905	1291.38	107.92	550	0.38%	1.1	51%	0.69	0.00	0.69	0	1.00	0.11	1.02	1.0	0.059	68.19	176.12	0.478	8.08	0.97	0.60	0.70	1.91	1.0	0.022	1.00	107.92	0.197	39.98	24.03	2	1.7	92.922	8.8964	107.924			
2.133	5607.50	53.2	0.150	53.2	1.9	0.83	0.28%	Interim Cover	0.050	100.7	0.11	0.00	0.11	0	1.70	90.491	1257.82	105.12	495	0.28%	1.0	51%	0.70	0.00	0.70	0	1.00	0.11	1.02	1.0	0.059	67.21	172.33	0.437	7.32	0.97	0.59	0.70	1.85	1.0	0.023	1.00	105.12	0.188	35.26	21.29	2	1.7	90.511	8.6655	105.123			
2.297	5607.33	46.8	0.504	46.8	2.3	1.01	1.08%	Interim Cover	0.050	100.7	0.12	0.00	0.12	0	1.70	79.560	1105.88	92.43	404	1.08%	1.5	51%	0.71	0.00	0.71	0	1.00	0.10	1.02	1.0	0.059	62.76	155.19	0.292	5.06	0.97	0.56	0.72	1.75	1.0	0.024	1.00	92.43	0.153	26.73	15.89	2	1.7	79.585	7.6194	92.433			
2.461	5607.17	59.1	1.594	59.1	3.4	1.48	2.70%	Interim Cover	0.050	100.7	0.12	0.00	0.12	0	1.70	100.470	1396.53	116.73	476	2.70%	1.8	51%	0.72	0.00	0.72	0	1.00	0.12	1.02	1.0	0.059	71.29	188.02	0.698	11.85	0.97	0.62	0.69	1.83	1.0	0.023	1.13	131.98	0.294	47.78	29.82	2	1.7	100.51	9.6225	116.732			
2.625	5607.01	70.3	1.024	70.2	6.0	2.59	1.46%	Interim Cover	0.050	100.7	0.13	0.00	0.13	0	1.70	119.408	1659.77	138.76	531	1.46%	1.6	51%	0.72	0.00	0.72	0	1.00	0.15	1.03	1.0	0.059	79.02	217.77	1.000	16.95	0.97	0.68	0.66	1.89	1.0	0.023	1.00	138.76	0.328	50.10	33.52	2	1.7	119.47	11.438	138.759			
2.789	5606.84	132.5	0.906	132.5	6.2	2.67	0.68%	Interim Cover	0.050	100.7	0.14	0.00	0.14	0	1.63	215.362	2993.54	250.20	942	0.68%	1.2	51%	0.73	0.00	0.73	0	0.99	0.30	1.05	1.0	0.060	#####	368.33	1.000	16.58	0.97	0.91	0.60	2.07	1.0	0.021	1.00	250.20	1.000	143.62	80.10	2	1.62559	215.42	20.625	250.203			
2.953	5606.68	69.0	0.500	69.0	1.8	0.78	0.72%	Interim Cover	0.050	100.7	0.15	0.00	0.15	0	1.70	117.249	1629.76	136.20	463	0.73%	1.3	51%	0.74	0.00	0.74	0	0.99	0.14	1.02	1.0	0.059	78.12	214.32	1.000	17.04	0.97	0.67	0.66	1.81	1.0	0.024	1.00	136.20	0.315	42.74	29.89	2	1.7	117.27	11.227	136.200			
3.117	5606.51	83.8	0.682	83.8	0.9	0.37	0.81%	Interim Cover	0.050	100.7	0.16	0.00	0.16	0	1.70	142.375	1979.01	165.37	533	0.82%	1.4	51%	0.75	0.00	0.75	0	0.99	0.18	1.03	1.0	0.059	88.35	253.72	1.000	16.98	0.97	0.74	0.63	1.88	1.0	0.023	1.00	165.37	1.000	128.60	72.79	2	1.7	142.38	13.632	165.371			
3.281	5606.35	49.0	0.298	49.0	3.9	1.69	0.61%	Sand Tailings	0.051	102.8	0.17	0.00	0.17	0	1.70	83.334	1158.34	96.84	296	0.61%	1.4	18%	0.76	0.00	0.76	0	0.99	0.10	1.01	1.0	0.058	46.85	143.68	0.245	4.22	0.97	0.57	0.72	1.60	1.0	0.027	1.00	96.84	0.164	20.08	12.15	2	1.7	83.375	7.9824	96.836			
3.445	5606.19	47.2	0.382	47.2	0.2	0.09	0.81%	Sand Tailings	0.051	102.8	0.17	0.00	0.17	0	1.70	80.172	1114.39	93.12	270	0.81%	1.5	18%	0.77	0.00	0.77	0	0.99	0.10	1.01	1.0	0.058	45.89	139.01	0.229	3.95	0.97	0.56	0.72	1.56	1.0	0.027	1.00	93.12	0.155	18.02	10.99	2	1.7	80.174	7.6759	93.117			
3.609	5606.02	46.3	0.306	46.3	0.6	0.28	0.66%	Sand Tailings																																														

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WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 3-4N									
Data File:	13-52106_SP3-4N-BSC-CPT	Idriss and Boulanger (2008)		5608.00	Water surface elevation during CPT investigation (ft)		5608.70	Ground Surface Elevation at time of CPT (ft amsl)	
Location:	White Mesa 2013 CPT Investigation	Max. Horiz. Acceleration, A _{max} /g:		0.15	5600.42		5623.35	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	
Field Data/2013 Field Investigation/Conetec Data		Earthquake Moment Magnitude, M:		5.5	5583.71		0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement of Final Cover (ft)	
Tailings Sands		Magnitude Scaling Factor, MSF:		1.69	5578.71		3.50	Thickness of Water Storage/Rooting Zone (ft)	
Tailings Sand-Slimes		Youd, et al (2001)					3.50	Thickness of High Compaction Layer (ft)	
Tailings Slimes		Max. Horiz. Acceleration, A _{max} /g:		0.15	1.44		7.15	Thickness of Random/Platform Fill on on top of existing interim cover (ft)	
Interim Cover		Earthquake Moment Magnitude, M:		5.5	0.47		1565.99	Additional Stress due to Final Cover Placement, Δσ _{FC} (psf)	
Cells Requiring User Input/Manipulation		Magnitude Scaling Factor, MSF:		2.21	7.51		5578.71	Elevation of bottom of tailings (liner) (ft amsl)	

FINAL COVER		Elev. at Top of Layer (ft)	Elev. At Midpoint of Layer (ft)	Bottom of Layer (ft)	Thickness of Layer (ft)	Unit Weight (pcf)	Unit Weight (pcf)	Stress at Bottom of Layer (tsf)	Stress at Midpoint of Layer (tsf)	Pressure at Bottom of Layer (tsf)	Equil Pore Pressure at Midpoint of Layer (tsf)	Stress at Bottom of Layer (tsf)	Stress at Midpoint of Layer (tsf)
Erosion Protection Layer	#####	5623.1	5622.85	0.50	0.055	110	0.028	0.014	0.00	0.00	0.00	0.028	0.014
Water Storage/Rooting Zone Layer	#####	5621.1	5619.35	3.50	0.054	107	0.215	0.121	0.00	0.00	0.00	0.215	0.121
High Compaction Layer	#####	5617.6	5615.85	3.50	0.060	120	0.424	0.320	0.00	0.00	0.00	0.424	0.320
Platform/Random Fill Layer	#####	5612.28	5608.70	7.15	0.050	101	0.784	0.604	0.00	0.00	0.00	0.784	0.604

2013 CPT Data from ConeTec								CPT Data Interpretations												Conditions at t _i				Liquefaction Triggering Analyses																Idriss & Boulanger (2008)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																												
Depth at time of CPT (ft)	Elevation (ft amsl)	qt	fs	qc	Pw (u2) (ft)	Pw (u2) PSI	fs/qt (%)	Material Type (as determined by CPT)	Unit Weight (pcf)	Unit Weight (pcf)	Stress at time of CPT (tsf)	Effective Stress at time of CPT (tsf)	Saturated at time of CPT 1=Yes 0=No	CPT Data Interpretations				Conditions at t _i				Idriss & Boulanger (2008)								Youd et al. (2001)								Idriss & Boulanger (2008)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
														CN	qc1	qc1	qc1N	Normalized Cone Penetration Resistance, q _c	Normalized Friction Ratio, F _r (%)	Type Index, I _c	FC %	Total Stress at t _i (tsf)	Pore Pressure at t _i (tsf)	Effective Stress at t _i (tsf)	Saturated at t _i 1=Yes 0=No	Cyclic Stress Ratio				Cyclic Resistance Ratio (CRR)				Cyclic Stress Ratio				(CRR)				Avg FoS	Liquefiable? 1=Yes 2=No	CN	qc1	qc1	qc1N																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					

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WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 3-6N

Data File: 13-52106_SP3-6N-BSC-CPT	Idriss and Boulanger (2008)	5604.20	Water surface elevation during CPT investigation (ft amsl)	5607.44	Ground Surface Elevation at time of CPT (ft amsl)	Elev. at Top of Layer (ft)	Elev. At Midpoint of Layer (ft)	Bottom of Layer (ft)	Thicknes s of Layer (ft)	Unit Weigh t (pcf)	Unit Weight (pcf)	Stress at Bottom of Layer (tsf)	Stress at Midpoint of Layer (tsf)	Pressure at Bottom of Layer (tsf)	Equil Pore Pressure at Midpoint of Layer (tsf)	Stress at Bottom of Layer (tsf)	Stress at Midpoint of Layer (tsf)
Location: White Mesa 2013 CPT Investigation	Max. Horiz. Acceleration, A _{max} /g: 0.15	5599.16	Water surface elevation at t ₀ (ft amsl)	5623.62	Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)	FINAL COVER	6623.37	5623.12	0.50	0.055	110	0.028	0.014	0.00	0.00	0.028	0.014
Earthquake Moment Magnitude, M: 5.5	Earthquake Moment Magnitude, M: 5.5	5590.44	Water surface elevation at t ₁ (ft amsl)	0.50	Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement of Final Cover (ft)	Erosion Protection Layer	#####	5623.37	5623.12	0.50	0.055	110	0.028	0.014	0.00	0.028	0.014
Earthquake Moment Magnitude, M: 5.5	Magnitude Scaling Factor, MSF: 1.69	5585.44	Water surface elevation at t ₂ (ft amsl)	3.50	Thickness of Water Storage/Rooting Zone (ft)	Water Storage/Rooting Zone Layer	#####	5621.37	5619.62	3.50	0.054	107	0.215	0.121	0.00	0.215	0.121
Tailings Sands	Youd, et al (2001)			3.50	Thickness of High Compaction Layer (ft)	High Compaction Layer	#####	5617.87	5616.12	3.50	0.060	120	0.424	0.320	0.00	0.424	0.320
Tailings Sand-Slimes	Max. Horiz. Acceleration, A _{max} /g: 0.15	1.44	Scaling Factor for stress ratio, r _m	8.68	Thickness of Random/Platform Fill on top of existing interim cover (ft)	Random/Platform Fill Layer	#####	5611.78	5607.44	8.68	0.050	101	0.861	0.643	0.00	0.861	0.643
Tailings Slimes	Earthquake Moment Magnitude, M: 5.5	0.47	Volumetric Strain Ratio for Site-Specific Design Earthquake	1720.10	Additional Stress due to Final Cover Placement, Δσ _{FC} (psf)												
Interim Cover	Magnitude Scaling Factor, MSF: 2.21	7.51	Equiv. Number of Uniform Strain Cycles, N	5585.44	Elevation of bottom of tailings (liner) (ft amsl)												
Cells Requiring User Input/Manipulation																	

2013 CPT Data from ConeTec										CPT Data Interpretations										Conditions at t _i										Liquefaction Triggering Analyses										Idriss & Boulanger (2008)											
Depth at time of CPT (ft)	Elevation (ft amsl)	qt	fs	qc	Pw (u2) (ft)	Pw (u2) (PSI)	fs/qt (%)	Material Type (as determined by CPT)	Unit Weight (pcf)	Unit Weight of CPT (pcf)	Total Stress at time of CPT (tsf)	Effective Stress at time of CPT (tsf)	Saturated at time of CPT 1=Yes 0=No	CN	qc1 TSF	qc1 MPa	qc1N	Normalized Cone Penetration Resistance, q _c	Normalized Friction Ratio, F _r (%)	Type Index, I _c	FC %	Total Stress at t _i (tsf)	Pore Pressure at t _i (tsf)	Effective Stress at t _i (tsf)	Saturated at t _i 1=Yes 0=No	Idriss & Boulanger (2008)										Youd et al. (2001)										Idriss & Boulanger (2008)					
																										Cyclic Stress Ratio					Cyclic Resistance Ratio					FoS	Cyclic Stress Ratio					(CRR)					Avg FoS	Liquefiable? 1=Yes 2=No	CN	qc1 TSF	qc1 MPa
r _d	C _{cs}	K _{cs}	K _s	CSR	Δq _{C1n}	q _{C1n-cs}	(CRR)	r _d	D _r	f	K _s	K _s	CSR	M=7.5, s _v =1atm	K _c	q _{C1n-cs}	(CRR)	M=7.5, s _v =1atm	FoS																																
0.164	5607.28	10.8	0.029	10.8	8.7	3.75	0.27%	Interim Cover	0.050	100.7	0.01	0.00	0.01	0	1.70	18.326	254.73	21.39	1310	0.27%	0.7	51%	0.87	0.00	0.87	0	1.00	0.05	1.00	1.0	0.058	37.83	59.22	0.087	1.51	0.96	0.27	0.80	2.53	1.0	0.017	1.00	21.39	0.068	166.66	84.08	2	1.7	18.418	1.7633	21.391
0.328	5607.11	17.1	0.110	17.0	4.0	1.74	0.64%	Interim Cover	0.050	100.7	0.02	0.00	0.02	0	1.70	28.968	402.66	33.69	1032	0.65%	1.1	51%	0.88	0.00	0.88	0	1.00	0.06	1.00	1.0	0.058	42.14	75.84	0.107	1.85	0.96	0.34	0.80	2.20	1.0	0.019	1.00	33.69	0.078	95.96	48.91	2	1.7	29.011	2.7775	33.694
0.492	5606.95	38.1	0.119	38.1	2.8	1.21	0.31%	Interim Cover	0.050	100.7	0.02	0.00	0.02	0	1.70	64.804	900.78	75.30	1538	0.31%	0.8	51%	0.88	0.00	0.88	0	1.00	0.09	1.00	1.0	0.058	56.75	132.05	0.208	3.61	0.96	0.50	0.75	2.43	1.0	0.017	1.00	75.30	0.120	98.14	50.88	2	1.7	64.834	6.2072	75.300
0.656	5606.78	56.7	0.134	56.7	2.8	1.21	0.24%	Interim Cover	0.050	100.7	0.03	0.00	0.03	0	1.70	96.339	1339.11	111.93	1714	0.24%	0.6	51%	0.89	0.00	0.89	0	1.00	0.12	1.00	1.0	0.058	69.60	181.53	0.561	9.75	0.96	0.61	0.69	2.71	1.0	0.016	1.00	111.93	0.210	129.42	69.59	2	1.7	96.369	9.2263	111.926
0.820	5606.62	78.5	0.600	78.5	2.0	0.88	0.76%	Interim Cover	0.050	100.7	0.04	0.00	0.04	0	1.70	133.399	1854.25	154.96	1899	0.76%	1.1	51%	0.90	0.00	0.90	0	1.00	0.17	0.99	1.0	0.057	84.70	239.66	1.000	17.43	0.96	0.72	0.64	2.98	1.0	0.014	1.00	154.96	0.426	209.74	113.58	2	1.7	133.42	12.774	154.960
0.984	5606.46	88.8	0.411	88.8	7.3	3.17	0.46%	Interim Cover	0.050	100.7	0.05	0.00	0.05	0	1.70	150.909	2097.64	175.36	1791	0.46%	0.9	51%	0.91	0.00	0.91	0	1.00	0.20	0.99	1.0	0.057	91.86	267.22	1.000	17.49	0.96	0.76	0.62	2.98	1.0	0.014	1.00	175.36	1.000	410.39	213.94	2	1.7	150.99	14.455	175.362
1.148	5606.29	97.1	0.455	97.1	6.7	2.89	0.47%	Interim Cover	0.050	100.7	0.06	0.00	0.06	0	1.70	165.002	2293.53	191.72	1678	0.47%	0.9	51%	0.92	0.00	0.92	0	1.00	0.24	0.98	1.0	0.057	97.60	289.32	1.000	17.57	0.96	0.80	0.60	2.94	1.0	0.014	1.00	191.72	1.000	351.91	184.74	2	1.7	165.07	15.804	191.722
1.312	5606.13	120.3	0.621	120.3	5.6	2.42	0.52%	Interim Cover	0.050	100.7	0.07	0.00	0.07	0	1.70	204.459	2841.98	237.54	1819	0.52%	1.0	51%	0.93	0.00	0.93	0	1.00	0.30	0.98	1.0	0.057	113.68	351.21	1.000	17.69	0.96	0.89	0.60	2.79	1.0	0.015	1.00	237.54	1.000	308.04	162.86	2	1.7	204.52	19.581	237.536
1.476	5605.96	117.5	1.100	117.5	6.9	2.99	0.94%	Interim Cover	0.050	100.7	0.07	0.00	0.07	0	1.70	199.682	2775.58	232.00	1579	0.94%	1.2	51%	0.93	0.00	0.93	0	1.00	0.30	0.98	1.0	0.056	111.74	343.74	1.000	17.73	0.96	0.88	0.60	2.66	1.0	0.016	1.00	232.00	1.000	273.92	145.83	2	1.7	199.76	19.125	232.004
1.640	5605.80	118.4	1.817	118.4	11.4	4.95	1.53%	Interim Cover	0.050	100.7	0.08	0.00	0.08	0	1.70	201.212	2796.85	233.84	1433	1.54%	1.4	51%	0.94	0.00	0.94	0	1.00	0.30	0.97	1.0	0.056	112.38	346.22	1.000	17.78	0.96	0.88	0.60	2.55	1.0	0.017	1.00	233.84	1.000	246.63	132.21	2	1.7	201.33	19.276	233.836
1.804	5605.64	123.5	2.268	123.4	21.1	9.14	1.84%	Interim Cover	0.050	100.7	0.09	0.00	0.09	0	1.70	209.780	2915.94	243.91	1358	1.84%	1.5	51%	0.95	0.00	0.95	0	1.00	0.30	0.97	1.0	0.056	115.92	359.82	1.000	17.83	0.96	0.90	0.60	2.46	1.0	0.017	1.00	243.91	1.000	224.30	121.06	2	1.7	210.20	20.106	243.907
1.968	5605.47	160.8	1.984	160.8	3.6	1.57	1.23%	Interim Cover	0.050	100.7	0.10	0.00	0.10	0	1.70	273.394	3800.18	317.58	1621	1.23%	1.3	51%	0.96	0.00	0.96	0	1.00	0.30	0.97	1.0	0.056	141.77	459.34	1.000	17.89	0.96	1.03	0.60	2.37	1.0	0.018	1.00	317.58	1.000	205.69	111.79	2	1.7	273.43	26.178	317.575
2.133	5605.31	176.8	1.510	176.8	2.1	0.90	0.85%	Interim Cover	0.050	100.7	0.11	0.00	0.11	0	1.70	300.577	4178.02	349.13	1645	0.85%	1.2	51%	0.97	0.00	0.97	0	1.00	0.30	0.97	1.0	0.056	152.84	501.97	1.000	17.96	0.96	1.08	0.60	2.30	1.0	0.018	1.00	349.13	1.000	189.94	103.95	2	1.7	300.6	28.779	349.128
2.297	5605.14	139.6	1.524	139.5	6.6	2.87	1.09%	Interim Cover	0.050	100.7	0.12	0.00	0.12	0	1.70	236.977	3293.98	275.32	1206	1.09%	1.3	51%	0.98	0.00	0.98	0	1.00	0.30	0.96	1.0	0.055	126.94	402.25	1.000	18.02	0.96	0.96	0.60	2.23	1.0	0.019	1.00	275.32	1.000	176.45	97.23	2	1.69827	237.05	22.695	275.316
2.461	5604.98	107.1	1.707	107.0	5.4	2.32	1.59%	Interim Cover	0.050	100.7	0.12	0.00	0.12	0	1.70	181.951	2529.12	211.39	863	1.60%	1.5	51%	0.98	0.00	0.98	0	1.00	0.30	0.96	1.0	0.055	104.50	315.90	1.000	18.08	0.96	0.84	0.60	2.17	1.0	0.019	1.00	211.39	1.000	164.75	91.41	2	1.7	182.01	17.425	211.391
2.625	5604.82	84.4	1.333	84.4	6.6	2.87	1.58%	Interim Cover	0.050	100.7	0.13	0.00	0.13	0	1.70	143.480	1994.37	166.72	638	1.58%	1.6	51%	0.99	0.00	0.99	0	1.00	0.19	0.97	1.0	0.056	88.83	255.55	1.000	17.84	0.96	0.75	0.63	2.01	1.0	0.021	1.00	166.72	1.000	154.51	86.18	2	1.7	143.55	13.744	166.725
2.789	5604.65	89.6	1.432	89.6	-4.7	-2.02	1.60%	Interim Cover	0.050	100.7	0.14	0.00	0.14	0	1.70	152.388	2118.19	176.93	637	1.60%	1.6	51%	1.00	0.00	1.00	0	0.99	0.21	0.97	1.0	0.056	92.41	269.34	1.000	17.94	0.96	0.77	0.62	2.01	1.0	0.021	1.00	176.93	1.000	145.48	81.71	2	1.7	152.34	14.585	176.932
2.953	5604.49	77.3	1.421	77.3	-4.6	-2.00	1.84%	Interim Cover	0.050	100.7	0.15	0.00	0.15	0	1.70	131.376	1826.13	152.53	518	1.84%	1.7	51%	1.01	0.00	1.01	0	0.99	0.16	0.97	1.0	0.056	83.85	236.38	1.000	17.87	0.96	0.71	0.64	1.87	1.0	0.023	1.01	154.81	0.425	58.42	38.14	2	1.7	131.33	12.573	152.528
3.117	5604.32	57.2	1.269	57.2	-3.2	-1.37	2.22%	Interim Cover	0.050	100.7	0.16	0.0																																							

WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 3-6N																									Elev. at Top of Layer (ft)		Elev. At Midpoint of Layer (ft)		Bottom of Layer (ft)		Thicknes s of Layer (ft)		Unit Weigh t (pcf)		Unit Weight (pcf)		Stress at Bottom of Layer (tsf)		Stress at Midpoint of Layer (tsf)		Pressure at Bottom of Layer (tsf)		Equip Pore Pressure at Midpoint of Layer (tsf)		Stress at Bottom of Layer (tsf)		Stress at Midpoint of Layer (tsf)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
Data File: 13-52106_SP3-6N-BSC-CPT		Idriss and Boulanger (2008)				5604.20				Water surface elevation during CPT investigation (ft amsl)				5607.44				Ground Surface Elevation at time of CPT (ft amsl)				FINAL COVER				Erosion Protection Layer				5623.37				5623.12				0.50				0.055				110				0.028				0.014				0.00				0.00				0.028				0.014																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							
Location: White Mesa 2013 CPT Investigation		Max. Horiz. Acceleration, Amax/g:				0.15				5599.16				Water surface elevation at t ₀ (ft amsl)				5623.62				Ground Surface Elevation Immediately after Placement of Final Cover (ft amsl)				Erosion Protection Layer				5621.37				5619.62				3.50				0.054				107				0.215				0.121				0.00				0.00				0.215				0.121																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							
J.A.V.16.2.3 Field Data/2013 Field Investigation/Conetec Data		Earthquake Moment Magnitude, M:				5.5				5590.44				Water surface elevation at t ₁ (ft amsl)				0.50				Thickness of Erosion Protection Layer (rock mulch/topsoils) Immediately after placement				ater Storage/Rooting Zone Layer				5617.87				5616.12				3.50				0.060				120				0.424				0.320				0.00				0.00				0.424				0.320																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							
Tailings Sands		Magnitude Scaling Factor, MSF:				1.69				5585.44				Water surface elevation at t ₂ (ft amsl)				3.50				Thickness of Water Storage/Rooting Zone (ft)				High Compaction Layer				5611.78				5607.44				8.68				0.050				101				0.861				0.643				0.00				0.00				0.861				0.643																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							
Tailings Sand-Slimes		Youd, et al (2001)				Max. Horiz. Acceleration, Amax/g:				0.15				1.44				Scaling Factor for stress ratio, r _m				8.68				Thickness of Random/Platform Fill on on top of existing interim cover (ft)				Platform/Random Fill Layer				5611.78				5607.44				8.68				0.050				101				0.861				0.643				0.00				0.00				0.861				0.643																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																			
Tailings Slimes		Earthquake Moment Magnitude, M:				5.5				0.47				Volumetric Strain Ratio for Site-Specific Design Earthquake				1720.10				Additional Stress due to Final Cover Placement, Δσ _{FC} (psf)				Platform/Random Fill Layer				5611.78				5607.44				8.68				0.050				101				0.861				0.643				0.00				0.00				0.861				0.643																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							
Interim Cover		Magnitude Scaling Factor, MSF:				2.21				7.51				Equiv. Number of Uniform Strain Cycles, N				5585.44				Elevation of bottom of tailings (liner) (ft amsl)				Platform/Random Fill Layer				5611.78				5607.44				8.68				0.050				101				0.861				0.643				0.00				0.00				0.861				0.643																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							
Cells Requiring User Input/Manipulation																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																													

WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 3-8N									
Data File: 13-52106_SP3-8N-BSC-CPT		Idriss and Boulanger (2008)		5604.90		Water surface elevation during CPT investigation (ft)			
Location: White Mesa 2013 CPT Investigation		Max. Horiz. Acceleration, A _{max} /g:		0.15		5600.09			
A.A.16.2.3 Field Data/2013 Field Investigation/Conetec Data		Earthquake Moment Magnitude, M:		5.5		5595.24			
Tailings Sands		Magnitude Scaling Factor, MSF:		1.69		5590.24			
Tailings Sand-Slimes		Youd, et al (2001)							
Tailings Slimes		Max. Horiz. Acceleration, A _{max} /g:		0.15		1.44			
Interim Cover		Earthquake Moment Magnitude, M:		5.5		0.47			
Cells Requiring User Input/Manipulation		Magnitude Scaling Factor, MSF:		2.21		7.51			
						Scaling Factor for stress ratio, r _m			
						Volumetric Strain Ratio for Site-Specific Design Earthquake			
						Equiv. Number of Uniform Strain Cycles, N			

	Elev. at Top of Layer (ft)	Elev. At Midpoint of Layer (ft)	Bottom of Layer (ft)	Thickness of Layer (ft)	Unit Weight (pcf)	Unit Weight (pcf)	Stress at Bottom of Layer (tsf)	Stress at Midpoint of Layer (tsf)	Pressure at Bottom of Layer (tsf)	Equil Pore Pressure at Midpoint of Layer (tsf)	Stress at Bottom of Layer (tsf)	Stress at Midpoint of Layer (tsf)
FINAL COVER												
Erosion Protection Layer	#####	5623.57	5623.32	0.50	0.055	110	0.028	0.014	0.00	0.00	0.028	0.014
Water Storage/Rooting Zone Layer	#####	5621.57	5619.82	3.50	0.054	107	0.215	0.121	0.00	0.00	0.215	0.121
High Compaction Layer	#####	5618.07	5616.32	3.50	0.060	120	0.424	0.320	0.00	0.00	0.424	0.320
Platform/Random Fill Layer	#####	5612.35	5608.37	7.95	0.050	101	0.825	0.624	0.00	0.00	0.825	0.624

2013 CPT Data from ConeTec										CPT Data Interpretations										Conditions at t _i										Liquefaction Triggering Analyses										Idriss & Boulanger (2008)															
Depth at time of CPT (ft)	Elevation (ft amsl)	qt	fs	qc	Pw (u2)	Pw (u2) PSI	fs/qt (%)	Material Type (as determined by flow chart)	Unit Weight (pcf)	Unit Weight of CPT (pcf)	Total Stress at time of CPT (tsf)	Effective Stress at time of CPT (tsf)	Saturated at time of CPT 1=Yes 0=No	CN	qc1	qc1	qc1N	Normalized Cone Penetration Resistance, q _c	Normalized Friction Ratio, F _r (%)	Type Index, I _c	FC %	Total Stress at t _i (tsf)	Pore Pressure at t _i (tsf)	Effective Stress at t _i (tsf)	Saturated at t _i 1=Yes 0=No	Idriss & Boulanger (2008)										Youd et al. (2001)										Idriss & Boulanger (2008)									
																										r _d	C _c	K _c	K _s	CSR	Δqc _i in	qc _i in	CRR	FoS	r _d	D _i	f	K _c	K _s	CSR	Kc	qc _i in	CRR	FoS	Avg FoS	Liquefiable? 1=Yes 2=No	CN	qc1	qc1	qc1N					
0.164	5608.21	4.6	0.040	4.6	1.7	0.73	0.87%	Interim Cover	0.050	100.7	0.01	0.00	0.01	0	1.70	7.837	108.93	9.12	558	0.87%	1.4	51%	0.83	0.00	0.83	0	1.00	0.04	1.00	1.0	0.058	33.52	42.65	0.071	1.22	0.96	0.17	0.80	2.53	1.0	0.017	1.00	9.12	0.058	141.30	71.26	2					1.7	7.8549	0.752	9.123
0.328	5608.04	22.0	0.044	22.0	2.8	1.22	0.20%	Interim Cover	0.050	100.7	0.02	0.00	0.02	0	1.70	37.315	518.68	43.37	1329	0.20%	0.6	51%	0.84	0.00	0.84	0	1.00	0.07	1.00	1.0	0.058	45.54	88.92	0.125	2.16	0.96	0.38	0.80	2.20	1.0	0.019	1.00	43.37	0.086	105.69	53.93	2					1.7	37.345	3.5754	43.374
0.492	5607.88	41.2	0.114	41.1	4.2	1.81	0.28%	Interim Cover	0.050	100.7	0.02	0.00	0.02	0	1.70	69.938	972.14	81.28	1660	0.28%	0.7	51%	0.85	0.00	0.85	0	1.00	0.09	1.00	1.0	0.058	58.84	140.12	0.233	4.02	0.96	0.52	0.74	2.52	1.0	0.017	1.00	81.28	0.130	106.34	55.18	2					1.7	69.982	6.7001	81.280
0.656	5607.71	59.5	0.362	59.4	4.7	2.05	0.61%	Interim Cover	0.050	100.7	0.03	0.00	0.03	0	1.70	101.031	#####	117.40	1798	0.61%	1.0	51%	0.86	0.00	0.86	0	1.00	0.12	1.00	1.0	0.058	71.52	188.92	0.721	12.47	0.96	0.63	0.69	2.77	1.0	0.015	1.00	117.40	0.230	141.52	76.99	2					1.7	101.08	9.6775	117.400
0.820	5607.55	65.8	0.430	65.7	4.5	1.93	0.65%	Interim Cover	0.050	100.7	0.04	0.00	0.04	0	1.70	111.758	#####	129.86	1591	0.65%	1.1	51%	0.86	0.00	0.86	0	1.00	0.13	1.00	1.0	0.058	75.89	205.75	1.000	17.31	0.96	0.66	0.67	2.72	1.0	0.016	1.00	129.86	0.284	139.38	78.34	2					1.7	111.81	10.704	129.855
0.984	5607.39	69.7	0.402	69.6	3.8	1.66	0.58%	Interim Cover	0.050	100.7	0.05	0.00	0.05	0	1.70	118.371	#####	137.53	1404	0.58%	1.0	51%	0.87	0.00	0.87	0	1.00	0.14	1.00	1.0	0.058	78.58	216.11	1.000	17.33	0.96	0.68	0.66	2.63	1.0	0.016	1.00	137.53	0.322	131.88	74.60	2					1.7	118.41	11.337	137.528
1.148	5607.22	68.4	0.655	68.4	3.8	1.64	0.96%	Interim Cover	0.050	100.7	0.06	0.00	0.06	0	1.70	116.314	#####	135.14	1183	0.96%	1.3	51%	0.88	0.00	0.88	0	1.00	0.14	1.00	1.0	0.058	77.74	212.88	1.000	17.35	0.96	0.67	0.66	2.48	1.0	0.017	1.00	135.14	0.310	108.73	63.04	2					1.7	116.35	11.14	135.138
1.312	5607.06	77.9	0.651	77.9	3.0	1.29	0.84%	Interim Cover	0.050	100.7	0.07	0.00	0.07	0	1.70	132.464	#####	153.89	1178	0.84%	1.2	51%	0.89	0.00	0.89	0	1.00	0.17	0.99	1.0	0.057	84.32	238.21	1.000	17.39	0.96	0.72	0.64	2.51	1.0	0.017	1.00	153.89	0.419	128.81	73.10	2					1.7	132.5	12.685	153.886
1.476	5606.89	71.1	0.676	71.0	6.8	2.96	0.95%	Interim Cover	0.050	100.7	0.07	0.00	0.07	0	1.70	120.768	#####	140.35	955	0.95%	1.3	51%	0.90	0.00	0.90	0	1.00	0.15	0.99	1.0	0.057	79.57	219.92	1.000	17.41	0.96	0.68	0.66	2.31	1.0	0.018	1.00	140.35	0.337	92.18	54.79	2					1.7	120.84	11.569	140.349
1.640	5606.73	61.8	0.871	61.7	6.0	2.61	1.41%	Interim Cover	0.050	100.7	0.08	0.00	0.08	0	1.70	104.941	#####	121.96	747	1.41%	1.5	51%	0.91	0.00	0.91	0	1.00	0.13	0.99	1.0	0.057	73.12	195.08	0.917	15.97	0.96	0.64	0.68	2.11	1.0	0.020	1.00	121.96	0.249	61.23	38.60	2					1.7	105	10.053	121.957
1.804	5606.57	70.3	1.290	70.3	5.1	2.22	1.83%	Interim Cover	0.050	100.7	0.09	0.00	0.09	0	1.70	119.476	#####	138.83	773	1.84%	1.6	51%	0.91	0.00	0.91	0	1.00	0.15	0.99	1.0	0.057	79.04	217.87	1.000	17.45	0.96	0.68	0.66	2.15	1.0	0.020	1.00	138.83	0.329	73.63	45.54	2					1.7	119.53	11.444	138.827
1.968	5606.40	106.9	2.471	106.9	8.4	3.62	2.31%	Interim Cover	0.050	100.7	0.10	0.00	0.10	0	1.70	181.679	#####	211.11	1078	2.31%	1.6	51%	0.92	0.00	0.92	0	1.00	0.30	0.98	1.0	0.057	104.41	315.52	1.000	17.68	0.96	0.84	0.60	2.37	1.0	0.018	1.00	210.84	1.000	205.32	111.50	2					1.7	181.77	17.402	211.112
2.133	5606.24	99.5	2.832	99.4	11.5	4.99	2.85%	Interim Cover	0.050	100.7	0.11	0.00	0.11	0	1.70	168.997	#####	196.42	925	2.85%	1.7	51%	0.93	0.00	0.93	0	1.00	0.25	0.98	1.0	0.057	99.25	295.67	1.000	17.67	0.96	0.81	0.60	2.30	1.0	0.018	1.07	210.34	1.000	189.61	103.64	2					1.7	169.12	16.191	196.422
2.297	5606.07	93.6	3.017	93.6	6.8	2.93	3.22%	Interim Cover	0.050	100.7	0.12	0.00	0.12	0	1.70	159.035	#####	184.79	808	3.23%	1.8	51%	0.94	0.00	0.94	0	1.00	0.22	0.98	1.0	0.057	95.17	279.96	1.000	17.68	0.96	0.78	0.61	2.20	1.0	0.019	1.12	206.98	1.000	176.13	96.91	2					1.7	159.11	15.233	184.793
2.461	5605.91	68.6	2.531	68.6	1.4	0.62	3.69%	Interim Cover	0.050	100.7	0.12	0.00	0.12	0	1.70	116.569	#####	135.41	552	3.70%	1.9	51%	0.95	0.00	0.95	0	1.00	0.14	0.99	1.0	0.057	77.84	213.24	1.000	17.59	0.96	0.67	0.66	1.92	1.0	0.022	1.22	165.03	1.000	164.46	91.02	2					1.7	116.58	11.162	135.406
2.625	5605.75	95.3	2.541	95.3	9.0	3.88	2.67%	Interim Cover	0.050	100.7	0.13	0.00	0.13	0	1.70	161.976	#####	188.24	720	2.67%	1.8	51%	0.96	0.00	0.96	0	1.00	0.23	0.98	1.0	0.056	96.38	284.61	1.000	17.80	0.96	0.79	0.60	2.10	1.0	0.020	1.08	202.56	1.000	154.24	86.02	2					1.7	162.07	15.517	188.236
2.789	5605.58	99.4	3.003	99.4	5.2	2.27	3.02%	Interim Cover	0.050	100.7	0.14	0.00	0.14	0	1.70	168.912	#####	196.25	707	3.03%	1.8	51%	0.96	0.00	0.96	0	1.00	0.25	0.97	1.0	0.056	99.19	295.43	1.000	17.90	0.96	0.81	0.60	2.07	1.0	0.020	1.11	218.70	1.000	145.22	81.56	2					1.7	168.97	16.177	196.246
2.953	5605.42	96.2	3.312	96.2	12.2	5.30	3.44%	Interim Cover	0.050	100.7	0.15	0.00	0.15	0	1.70	163.489	#####	190.03	646	3.45%	1.9	51%	0.97	0.00	0.97	0	1.00	0.24	0.97	1.0	0.056	97																							

WHITE MESA TAILINGS REPOSITORY LIQUEFACTION AND SEISMIC SETTLEMENT ANALYSES - 3-8N																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																										
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[illegible]

ATTACHMENT F

SUPPORTING DOCUMENTATION FOR INTERROGATORY 08/1:

**REVISED APPENDIX G, EROSIONAL STABILITY EVALUATION, TO THE UPDATED
TAILINGS COVER DESIGN REPORT (APPENDIX D OF THE RECLAMATION PLAN,
REVISION 5.0)**

APPENDIX G

EROSIONAL STABILITY EVALUATION

G.1 INTRODUCTION

This appendix presents the hydrologic analysis and evaluation of erosion protection for the cover surface of the White Mesa Mill tailings disposal cells, and for the discharge channel and sedimentation basin. These analyses are an update to the analyses presented in MWH (2011) to incorporate revisions to the analyses to address State of Utah, Division of Waste Management and Radiation Control (DWMRC) (formerly Utah Division of Radiation Control, DRC) interrogatories (DRC, 2012) and review comments on EFRI responses to 2012 interrogatories (DRC, 2013). These analyses also incorporate the revised cover grading design and results of cover material testing conducted in 2010 and 2012 (summarized in Attachment B of EFRI, 2012). These analyses have been conducted in a manner consistent with Nuclear Regulatory Commission (NRC) guidelines documented in NRC (1990) and Johnson (2002). The analyses include the tasks listed below.

1. Selection of the Probable Maximum Precipitation (PMP) as the design event for the site.
2. Calculation of the peak discharge (due to the PMP) from the surfaces of Cells 1, 2, 3, 4A and 4B for the cover surface, and for the drainage basin for the discharge channel.
3. Evaluation of reclaimed tailings disposal cell surfaces for erosional stability (the top surfaces and the reclaimed embankment slopes) and evaluation of the discharge channel and sedimentation basin for erosional stability.
4. Evaluation of the need for filter material between erosional protection riprap and underlying soil layers on the transition slopes on the top surface, the reclaimed embankment slopes, and the rock aprons.
5. Evaluation of the need for a rock apron at the toe of the reclaimed embankment slopes to accommodate flow transitioning from embankment slopes to native ground.
6. Evaluation of surface sheet erosion of top surface of cells due to action of surface water and wind.

These tasks are presented in the following sections of this appendix.

G.2 CONCEPTUAL EROSIONAL PROTECTION DESIGN

Erosional protection was evaluated for the proposed monolithic ET cover design based on the following proposed cover surface of the tailings disposal cells, as well as for the sedimentation basin and diversion channel:

- Cells 2 and 3 top surfaces graded to 0.5 percent slope: Erosional protection is provided by 6 inches of topsoil vegetated with a grass mixture providing poor or better vegetated conditions with a minimum of 30 percent plant coverage (representing drought conditions).
- Portions of Cell 1 and 2 with top surfaces graded at 1 percent slope and Cells 4A and 4B with top surfaces at 0.8 percent slope: Erosional protection is provided by 6 inches of topsoil mixed with 25 percent (by weight) of 1-inch minus ($D_{100} = 1$ inch) gravel, vegetated with a grass mixture providing poor or better vegetated conditions with a minimum of 30 percent plant coverage (representing drought conditions).

- External side slopes graded to 5 horizontal to 1 vertical (5H:1V): Erosional protection is provided by various sized angular and rounded riprap with thicknesses ranging from 6 to 8 inches and minimum D_{50} 's ranging from 1.5 to 5.3 inches. Filter material will be placed between the erosional protection and the underlying soil layer.
- Cover transition slopes graded to 10H:1V: Erosional protection is provided by 7 inches of angular riprap with a minimum D_{50} of 4.5 inches. Filter material will be placed between the erosional protection and the underlying soil layer.
- A rock apron at the toe of 5H:1V slopes: Erosional protection and scour protection on the west and east sides of the cells is provided by a rock apron measuring 10.2 inches deep and 4.25 feet in width, with a D_{50} of 3.4 inches. On the south side of cells 4A and 4B, and east side of Cell 4A, the rock apron measures 2.7 feet in depth, 13.2 feet in width, and has a D_{50} of 10.6 inches. On the north side slope of the Cell 1 disposal area, the rock apron measures 2.3 feet deep, 11.3 feet wide, and contains a minimum D_{50} of 9.0 inches.
- Sedimentation Basin area graded to 0.1 percent slope: Erosional protection is provided by 6 inches of topsoil vegetated with a grass mixture providing poor or better vegetated conditions with a minimum of 30 percent plant coverage (representing drought conditions).
- Diversion Channel: The diversion channel will be excavated into bedrock.

G.3 PROBABLE MAXIMUM PRECIPITATION EVENT

As outlined in NRC (1990) and Johnson (2002), the design event for evaluation of long-term erosional stability of the reclaimed tailings disposal cells is the PMP. The selected PMP events used to calculate the peak discharges for evaluation of erosional stability were the six-hour duration PMP (with a precipitation total of 9.6 inches) and the one-hour duration PMP (with a precipitation total of 8.3 inches). These events were determined for the site area using "Hydrometeorological Report (HMR) No. 49: Probable Maximum Precipitation Estimates, Colorado River and Great Basin Drainages (Hansen et al. 1984) , as well as Jensen (1995). Rainfall depth versus duration for short-term events (less than 1 hour) was developed using procedures in HMR 49 and NUREG/CR-4620 (Nelson et al., 1986). PMP calculations were provided in Denison (2009) and updated in Denison (2012). The calculations are provided in Attachment G.1.

G.4 CALCULATION OF PEAK DISCHARGE

The peak discharge calculations were made using the Rational Method as described in Johnson (2002) and Nelson et al. (1986). The time of concentration was calculated for the longest flow path (see Figure G.1) across the tailings disposal cells using procedures by Kirpich, Soil Conservation Service (SCS) and Brant and Oberman as presented in Nelson et al. (1986) and DOE (1989). Equal weight was given to each of the three methods. A runoff coefficient of 1.0 was used to represent PMP conditions (DOE, 1989). These characteristics represent high runoff quantities and peak flow velocities.

The PMP discharge results across the tailings disposal cells are presented in Table G.1. These discharges represent flow across a unit-width across the slope.

Table G.1. Peak Reclaimed Surface Discharges

Location	Slope Length (feet)	Time of Concentration (min)	Rainfall Intensity (in/hr)	Runoff Coefficient	Peak Unit Discharge (cfs/ft)
Upper reach of Cell 2 at 1 % slope	900	9.4	32.7	1.0	0.68
Lower reach of Cell 2 at 0.5 % slope	550	18.5	21.4	1.0	0.71
Cell 3 at 0.5 % slope	830	30.0	14.8	1.0	0.78
Cell 4A at 0.8 % slope	1200	42.2	11.2	1.0	0.90
Cell 4A side slopes at 20% slope	100	42.2	11.2	1.0	0.92

Note: Flow accumulates as it flows from Cell 2 to Cell 4A

The unit discharge values in Table G.1 above were used to evaluate the erosional stability of the reclaimed surfaces and size erosion protection materials where necessary. These evaluations are presented in Sections G.5 and G.6.

G.5 EROSIONAL STABILITY OF VEGETATED SLOPES

The surface of the reclaimed tailings disposal cells was evaluated for erosional stability using the methods recommended in NRC (1990) and Johnson (2002).

Temple Method. Temple et al. (1987) outlines procedures for grass-lined channel design. These procedures are recommended in Johnson (2002) for areas of vegetated cover and include methods for estimating stresses on channel vegetation as well as the channel surface soils. The evaluation for the tailings disposal cells used the peak discharge values from the PMP (summarized in Table G.1) to conservatively represent the effective stresses from runoff on the cover surface. The stresses on both the vegetation and the soil were evaluated.

The erosional stability of the cover surface for the tailings disposal cells was evaluated by calculating a factor of safety against erosion due to the peak runoff from the PMP. Factor-of-safety values were calculated as the ratio of the allowable stresses (the resisting strength of the cover vegetation or soils) to the effective stresses (the stresses impacted by the runoff flowing over the cover). Two factors of safety were calculated for each analysis to evaluate both the resistance of the vegetation, and the resistance of the silty topsoil layer. The peak unit discharge flow for the tailings disposal cells (from Table G.1) was conservatively multiplied by a concentration factor of 3 to account for channelization of flow.

Allowable stresses. Allowable stresses for the cover soils were calculated using the equations in Temple et al. (1987). Material planned for the upper layer of the cover system is the on-site stockpiled topsoil. Laboratory testing of the topsoil conducted in 2010 (see Appendix A) indicates the topsoil classifies as either a silty clay with sand or a sandy silty clay. The D_{75} (diameter of which 75 percent of the material is finer) is approximately 0.08 mm to 0.1 mm (.003 in to .004 in) with a plasticity index (PI) of approximately 4 to 7. The resistance of a silty soil with a PI less than 10 is estimated to be approximately 0.02 psf (Temple et al., 1987). For noncohesive soils with a D_{75} greater than 0.05 in., the resistance is calculated as follows:

$$\begin{aligned}\tau_a &= 0.4D_{75}, \text{ for soils with } D_{75} > 0.05 \text{ in,} \\ \tau_a &= 0.02, \text{ for noncohesive soils with } D_{75} \leq 0.05 \text{ in.}\end{aligned}$$

Where

τ_a = allowable shear strength (psf), and
 D_{75} = particle diameter in which 75 percent of the soil is finer (inch).

For areas where 1-inch gravel is added to the topsoil (25 percent by weight), the D_{75} of the topsoil mixture will increase to approximately 0.2 inches.

As discussed in Appendix J of this report, the cover will be vegetated with a mixture of perennial grasses (primarily wheatgrass, ricegrass, squirreltail, and fescue) and forbs (yarrow and sage). The allowable vegetation shear strength is calculated as:

$$\tau_{va} = 0.75C_I$$

Where

τ_{va} = allowable vegetation shear strength (in psf),
 C_I = cover index = $2.5 [h(M)^{1/2}]^{1/3}$,
 h = stem length (ft), and
 M = stem density factor (stems per square ft).

Conservatively using poor vegetation conditions, $h=1.0$, $M=67$, and $C_I=5.03$, the resulting vegetation shear strength value is 3.78 psf.

Effective stresses. The effective shear stress on soil due to peak runoff from the PMP was calculated as:

$$\tau_e = \gamma d S (1 - C_f) (n_s/n)^2$$

Where

τ_e = effective shear stress (psf),
 γ = unit weight of water = 62.4 pcf,
 d = depth of flow (ft), from Table G.2,
 S = slope of cover surface (ft/ft), from Table G.1,
 C_f = cover factor (0.375 for poor vegetation),
 n_s = soil roughness factor (0.0156 for soils with $D_{75} \leq 0.05$ in., or $0.0256(D_{75})^{1/6}$ for $D_{75} > 0.05$ in), and
 n = Manning's roughness coefficient for vegetated surface.

$$n = e^{C_i(0.0133[\ln q]^2 - 0.0954 \ln q + 0.297) - 4.16}$$

The effective shear stress on vegetation is calculated as:

$$\tau_v = \gamma dS - \tau_e$$

Where

τ_v = effective vegetal stress (psf).

Conservatively using poor vegetation conditions, the effective shear stresses on soil and vegetation on the tailings cover surfaces are summarized in Table G.2.

Table G.2. Effective Shear Stresses on Soil and Vegetation

Location	Description of Erosion Protection	Depth of Flow ¹ (ft)	Soil			Vegetation		
			Effective Shear Stress (psf)	Allowable Shear Stress (psf)	Factor of Safety	Effective Shear Stress (psf)	Allowable Shear Stress (psf)	Factor of Safety
Cell 1 at 1% slope	Vegetation and Gravel (D ₇₅ =0.2 in)	0.80	0.040	0.08	2.0	0.449	3.78	8.4
Cell 2 at 0.5 % slope	Vegetation (D ₇₅ = 0.003 in)	1.01	0.019	0.02	1.1	0.297	3.78	12.7
Cell 2 at 1 % slope	Vegetation and gravel (D ₇₅ = 0.2 in)	0.82	0.044	0.08	1.8	0.467	3.78	8.1
Cell 3 at 0.5 % slope	Vegetation (D ₇₅ = 0.003 in)	1.05	0.021	0.02	1.0	0.306	3.78	12.4
Cells 4A and 4B at 0.8 % slope	Vegetation and gravel (D ₇₅ = 0.2 in)	0.97	0.050	0.08	1.6	0.433	3.78	8.7

¹ Calculated using a concentration factor of 3 for peak unit discharge

The calculated factors of safety above show that for poor vegetation conditions, the allowable shear strengths are equal to or higher than the effective shear stresses on both the vegetation and the soil during peak discharge from the PMP. When vegetation conditions are good or better, the soil factor of safety improves significantly, while the vegetation factor of safety decreases slightly, but remains well above 1.0. Further details of calculations can be found in Attachment G.2.

These analyses indicate that the cover on the top surface of the tailings disposal cells can be constructed as a vegetated slope. Top slopes at 0.5 percent slopes are adequately stable without the addition of gravel, while the 1 percent slope in Cell 2, and the 0.8 percent slope in Cells 4A and 4B will require the addition of approximately 25 percent of 1-inch-minus gravel.

G.6 EROSIONAL STABILITY OF ROCK-PROTECTED SIDE-SLOPES

Because of the difficulty in maintaining vegetation on side slopes, the 5:1 side slopes have been designed for erosional protection assuming vegetation is minimal. The maximum unit discharge value from Table G.1 was used to size riprap for the embankment slopes. The Johnson and Abt

method referenced in Johnson (2002) was used for the side slopes. The required angular rock size is calculated as follows:

$$D_{50} = 5.23S^{0.43}q_{design}^{0.56}$$

Where

D_{50} = median particle diameter of which 50 percent of the soil is finer (inch),

S = slope (ft/ft), and

q_{design} = design flow (cfs/ft).

Flow Characteristics. The peak unit discharge values from Table G.1 were used to represent flow conditions across the cover surface and down the embankment side slopes south of Cells 4A and 4B. Concentration factors of 3 were used to account for channelization of flow.

Rock Characteristics. A specific gravity of 2.65 was assumed for the riprap. The overall erosion protection design uses rounded and angular rock for the embankment side slopes. Angular rock was selected for slopes where the required minimum D_{50} for rounded rock was too large to produce. For areas where rounded rock was selected, the minimum D_{50} was increased by 40 percent in the design to account for rounded rock characteristics (Abt and Johnson, 1991). The results of the riprap sizing for the embankment slopes are summarized in Table G.3 below.

Table G.3. Results of Riprap Sizing

Location	Design Unit Discharge (cfs/ft)	Slope (ft/ft)	Concentration Factor	Median Rock Size (inches)
Non-Accumulating Side Slopes (Rounded Rock)	0.06	0.20	3	1.7
Cell 4A and 4B southern side slopes(Angular Rock)	0.87	0.20	3	5.3
Cell 1 Disposal Area side slope (Angular Rock)	0.65	0.20	3	4.5

Filter Requirements. NUREG-1623 (Johnson, 2002) recommends a filter or bedding layer be placed under the erosion protection if interstitial velocities are greater than 1 ft/s, in order to prevent erosion of the underlying soils. Bedding is not required if interstitial velocities are less than 0.5 ft/s, and are recommended depending on the characteristics of the underlying soil if velocities are between 0.5 and 1.0 ft/s.

Interstitial velocities are calculated by procedures presented by Abt et al. (1991) as given in the following equation:

$$V_i = 0.23(g \times D_{10} \times S)^{0.5}$$

Where

V_i = interstitial velocities (ft/s),

G = acceleration due to gravity (ft/s²),

D_{10} = stone diameter at which 10 percent is finer (inches), and

S = gradient in decimal form.

The maximum D_{10} of the erosion protection is estimated based on the D_{50} required for erosion protection, assuming the erosion protection will have a coefficient of uniformity (CU) of 6 and a

band width of 5. Band width refers to the ratio of the minimum and maximum allowed particle sizes acceptable for any given percent finer designation. USDA (1994) recommends CU to be a maximum of 6 in order to prevent gap-grading of filters. Table G.4 summarizes the results for the side slopes.

Table G.4. Results of Filter Requirements for Side Slopes

Location	Non-Accumulating Side Slopes (Rounded Rock)	Cell 4A and 4B southern side slopes(Angular Rock)	Cell 1 Disposal Area side slope (Angular Rock)
Minimum D ₅₀ (inches)	1.7	5.3	4.5
Maximum D ₁₀ (inches)	0.53	1.65	1.40
Slope (%)	20	20	20
Interstitial Velocity (ft/s)	0.43	0.75	0.69
Filter Requirement	No	Recommended	Recommended

Based on the results in Table G.4 and the fine-grained nature of the top soil, it is recommended that a filter be placed between the soil and the rock protection for the side slope areas that require angular riprap. These areas include the southern side slopes of Cells 4A and 4B as well as the northern side slope of the Cell 1 disposal area as shown in Figure G.1. The interstitial velocity results confirm that a filter is not necessary for the non-accumulating side slopes where rounded rock is proposed on the west and east sides of Cells 2, 3 and 4.

Gradation for proposed Filter. The procedure from USDA (1994) for determining the gradation limits for a sand or gravel filter was used to evaluate the type of material needed to satisfy filter requirements between the soil and rock protection for the side slopes. The method details twelve steps to determine an appropriate gradation range for the filter layer. The steps can be found in Chapter 26 of the USDA Handbook and are shown in the Attachment G.2 for supporting calculations. In addition, Equation 5.3 from Cedegren (1989) and Equation 4.36 from Nelson et al. (1986) were used to determine the filter gradation requirements. Table G.5 presents the recommended gradation.

Table G.5. Results of Filter Gradation Requirements

Diameter (mm)	Sieve Sizes	Percent Passing
76.2	3"	100
4.75	No. 4	70-100
0.85	No. 20	40-60
0.075	No. 200	0-5

Based on the results of Table G.5, the filter material should be a medium sand that will be placed between the erosion protection and the base layer on the side slopes.

Sheet Erosion. The Modified Universal Soil Loss Equation (MUSLE) as presented in NUREG/CR4620 (Nelson et al., 1986) was used to evaluate the potential for soil loss due to sheet flows across the gravel/topsoil surface layer of the cover.

The MUSLE is defined as:

$$A = R * K * LS * VM$$

Where:

A = soil loss, in tons per acre per year,

R = rainfall factor,

K = soil erodibility factor,

LS = topographic factor, and

VM = dimensionless erosion factor relating to vegetative and mechanical factors

The rainfall factor, R, is 30, as given in NUREG/CR-4620 for the eastern third of Utah. The soil erodibility factor, K, was estimated to be 0.28 for the topsoil and 0.16 for the gravel and topsoil mixture, based on the nomograph (Fig. 5.1) in NUREG/CR-4620.

The topographic factor, LS, is calculated based on the following equation:

$$LS = \frac{650 + 450s + 65s^2}{10,000 + s^2} * \left(\frac{L}{72.6} \right)^m$$

Where:

s = slope steepness, in percent (%),

L = slope length in feet,

m = slope steepness dependent exponent

The topographic factor was calculated using a slope of 0.82 percent and a slope length of 1,300 feet. From the Table 5.2 in NUREG/CR-4620, the slope steepness exponent, m, is 0.2 for slopes less than or equal to 1.0 percent.

The erosion factor, VM, used was 0.4, from Table 5.3 of NUREG/CR-4620, to represent seedlings of 0 to 60 days, to mimic light vegetation on the cover. Table G.5 summarizes the MUSLE results for the proposed topsoil and the proposed topsoil mixed with 25 percent gravel, by weight.

Table G.6. Results of MUSLE

Soil Cover	Proposed Topsoil	Proposed Topsoil with 25% Gravel
Rainfall factor, R	30	30
Silt and very fine sand (%)	43.6	32.7
Sand (%)	39.2	29.4
Organic matter (%)	1.5	1.5
Soil structure	Fine granular	Medium or coarse granular
Relative permeability	Moderate	Moderate to rapid
Erodibility factor, K	0.28	0.12
Topographic Factor, LS	0.16	0.19
Erosion factor, VM – low density seedlings	0.4	0.4
Soil loss (tons/acre/year)	0.54	0.27
Soil loss (inches/1,000 years)	3.0	1.4

The soil loss equation shows the potential for erosion will be reduced by almost one half, by using 25 percent gravel in the topsoil mixture. The topsoil loss of 1.5 to 3.0 inches over the life of the cover (1,000 years) is less than the minimum design thickness of 6 inches.

G.7 ROCK SIZING FOR APRON

Additional erosion protection will be provided for runoff from the south side slopes of the reclaimed surfaces of Cells 4A and 4B, the east side of Cell 4A, and the north side of Cell 1 with a rock apron. The perimeter apron will: (1) serve as an impact basin and provide for energy dissipation of runoff, (2) provide erosion protection, and (3) transition flow from side slopes to natural ground. The median rock size required in the perimeter apron was calculated using the equations derived by Abt et al. (1998) as outlined in NUREG 1623 (Johnson, 2002) as follows:

$$D_{50 \text{ energy dissipation}} = 10.46S^{0.43}q^{0.56}$$

Flow Characteristics. The peak unit discharge values from Table G.1 were used to represent flow conditions down the embankment side slopes south of Cells 4A and 4B. Concentration factors of 3 were used to account for channelization of flow.

Rock Characteristics. A specific gravity of 2.65 was assumed for the riprap. Both rounded and angular rock was used in the apron design.

Based on the above equation, the rock apron (Apron A) along the toe of the non-accumulating slopes covered with rounded riprap (west and east side slopes of Cells 2 and 3) should be constructed using rounded rock with a median rock diameter of 3.4 inches. The width of the apron should be a minimum of 15 times the median rock size (4.25 ft) and the apron thickness should be a minimum of three times the median rock size (10.2 inches). Rock Apron B should be placed on the toes of the south slope of Cells 4A and 4B and along the east of Cell 4A. Apron B should have a median angular rock size of 10.6 inches, with a minimum width of 13.2 feet and a minimum thickness of 2.7 feet. Rock Apron C should be placed on the toes of the remaining slope (Cell 1 disposal area side slope). Apron C should have a median rock size of 9.0 inches, a minimum width of 11.3 feet, and a minimum thickness of 2.3 feet.

Filter Requirements. NUREG-1623 (Johnson, 2002), as detailed in section G.6, was used to determine if a bedding layer was required for the rock aprons. The results are presented in Table G.7 below.

Table G.7. Results of Filter Requirements for Rock Aprons

Location	Apron A: Non-Accumulating Slopes (Rounded)	Apron B: Cell 4A and 4B slopes(Angular)	Apron C: Cell 1 disposal area side slope (Angular)
Minimum D ₅₀ (inches)	3.4	10.6	9.0
Maximum D ₁₀ (inches)	1.0	3.3	2.8
Slope (%)	1	1	1
Interstitial Velocity (ft/s)	0.13	0.24	0.22
Filter Requirement	No	No	No

Based on the results in Table G.7, it is not required to place a bedding layer between the soil and rock protection for the rock aprons.

G.8 DISCHARGE CHANNEL AND SEDIMENTATION BASIN

The PMP event described in Section G.3 was used to determine the peak discharge to the channel to be located at the west end of the sedimentation basin. The peak discharge calculations were made using the Rational Method and the time of concentration was calculated for the longest flow path (see Figure G.1) across the mill site and sedimentation basin using the procedures described in section G.4. A runoff coefficient of 1.0 was used to represent PMP conditions (DOE, 1989). These characteristics represent high runoff quantities and peak flow velocities.

The PMP peak discharge calculated across the mill site and sedimentation basin is presented in Table G.8. This discharge represents the peak flow into the channel. Further details of the calculations can be found in Attachment G.1

Table G.8. Peak Discharge Flow to the Discharge Channel

Location	Slope Length (feet)	Time of Concentration (min)	Rainfall Intensity (in/hr)	Runoff Coefficient	Peak Discharge (cfs)
Mill site and sedimentation basin	4,600	26.3	16.4	1.0	2,440

The peak discharge value in Table G.8 above, was used to evaluate the peak flow velocities through the discharge channel excavated into bedrock. The channel dimensions are shown on Drawing REC-3 and include a 150-foot bottom width and 3:1 (H:V) side slopes. The Manning's n-value was estimated and adjusted based on the anticipated type of bedrock and the presumed roughness, along the channel, after excavation. Table G.9 includes peak flow velocities for Manning's n-values of 0.02 and 0.03.

Table G.9. Peak Discharge Channel Flow Velocities

Location	Channel Bottom Width (feet)	Channel Side Slopes (H:V)	Manning Coefficient, n	Flow Depth (ft)	Cross Sectional Area of Flow (ft ²)	Hydraulic Radius (ft)	Peak Velocity (fps)
Discharge channel	150	3:1	0.02	1.67	259	1.61	9.4
Discharge channel	150	3:1	0.03	2.12	332	2.03	7.3

Based on the available bedrock information near the channel location, the rock is expected to consist of a fine to medium-grained sandstone with varying degrees of cementation and weathering, or a claystone (Dames and Moore, 1978). The shear wave velocities from seismic refraction surveys indicate the bedrock will range from rippable to hard rock, requiring blasting (D'Appolonia, 1979). Because of this variability, an initial Manning's n-value of 0.015 was selected, for a channel in rock and then modifications of 0.005 and 0.015 were added for increasing irregularities in the final excavated rock surface. (USBR, 1987). Maximum suggested

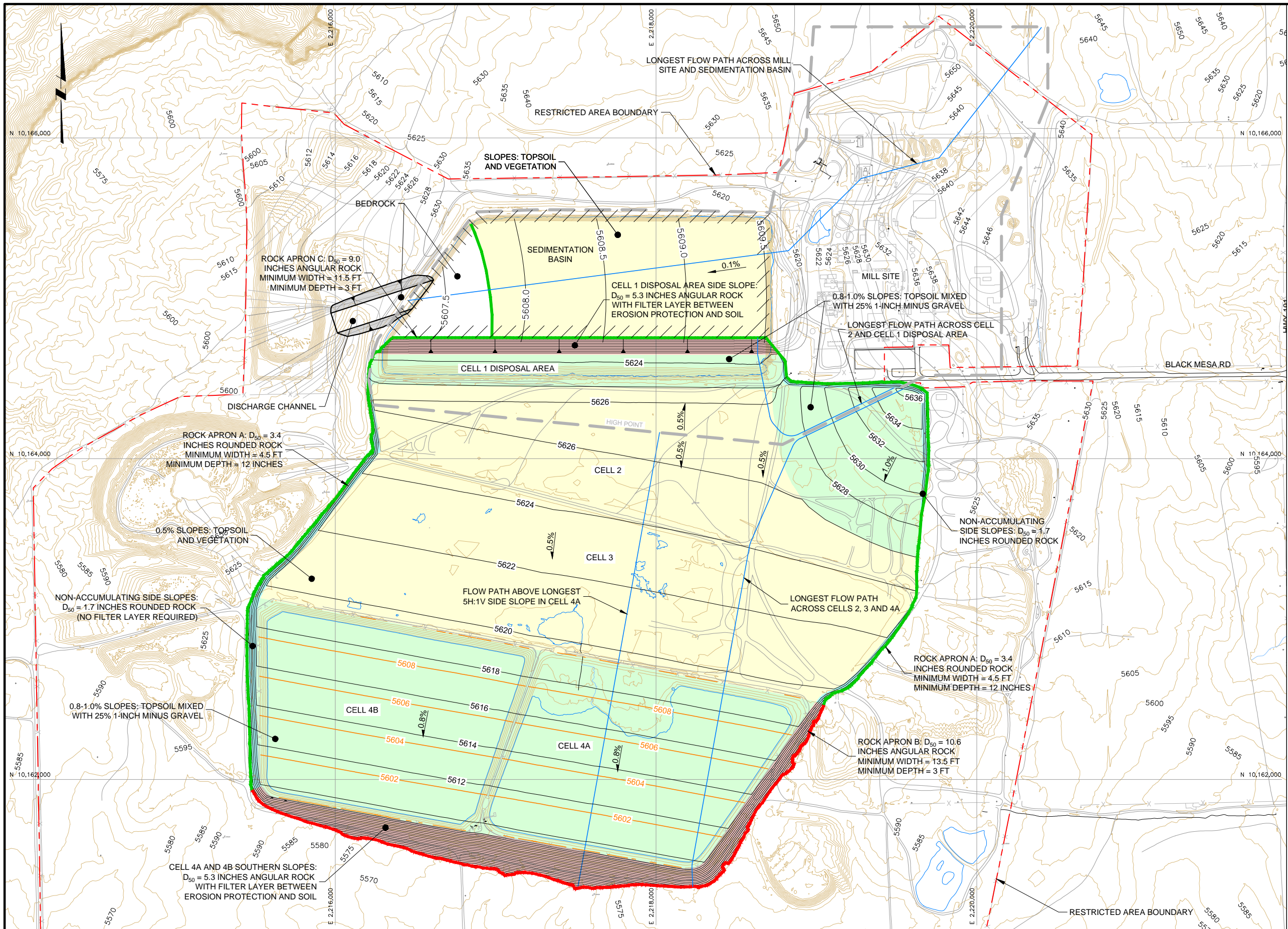
permissible peak channel velocities are 10 feet per second for channels excavated in “poor rock” (USACE, 1994).

G.9 REFERENCES

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LEGEND:

- 5605 EXISTING GROUND SURFACE ELEVATION, FEET (SEE REFERENCE)
- 5605 TOP ON INTERIM FILL ELEVATION, FEET
- 5605 MAXIMUM PERMITTED TAILINGS SURFACE CONTOUR AND ELEVATION, FEET
- EXISTING ROAD
- EXISTING WATER
- EXISTING TRAIL
- X EXISTING FENCE
- DRAINAGE AREA TO DISCHARGE CHANNEL, 147.3 ACRES
- FLOW PATH
- EXISTING STRUCTURE
- SEDIMENTATION BASIN

0 300' 600'

Energy Fuels Resources (USA) Inc.

WHITE MESA MILL TAILINGS RECLAMATION

TITLE

RECLAMATION COVER EROSION PROTECTION



FIGURE G.1

FILE NAME: WMM EROS PRO DATE: AUG 2015

ATTACHMENT G.1

**PMP CALCULATIONS
DENISON (2012)
DENISON (2009)**

Client: Denison Mines
 Project: White Mesa Reclamation Plan
 Detail: Updated Probable Maximum Precipitation (PMP) Calculation

Job No.: 1009740
 Date: 5/10/2012
 Computed By: MMD

References:

Denison Mines (USA) Corporation (Denison), 2009. Re: Cell 4B Lining System Design Report, Response to DRC Request for Additional Information – Round 3 Interrogatory, Cell 4B Design – Exhibit C: Probable Maximum Precipitation (PMP) Event Calculation, Letter to Dane Finerfrock, September 11.

Hansen, E. M., Schwarz, F.K., Riedel, J.T., 1984. Hydrometeorological Report No. 49: Probable Maximum Precipitation Estimates, Colorado River and Great Basin Drainages, Hydrometeorological Branch Office of Hydrology, National Weather Service, U.S. Department of Commerce, National Oceanic and Atmosphere Administration, U.S. Department of the Army, Corps of Engineers, Silver Springs, MD.

Jensen, D. 1995. Final Report: Probable Maximum Precipitation Estimates for Short Duration, Small Area Storms in Utah, October.

Jensen, D., 2003. 2002 Update for Probable Maximum Precipitation, Utah 72 Hour Estimates to 5,000 sq. mi., March.

Utah Division of Radiation Control (DRC), 2012. Denison Mines (USA) Corp's White Mesa Reclamation Plan, Rev. 5.0, Interrogatories - Round 1, March.

Approach:

Update previous calculations (Denison, 2009) to incorporate Jensen (1995) and Jensen (2003) references as recommended by DRC (2012) Jensen (2003) is applicable for 72-hour durations for areas up to 5,000 square miles. Incorporation of this reference does not modify the previous calculations for one-hour or six-hour duration PMP values for the site.

Calculations:

Site Information

Parameter	Value	Units	Comments
Drainage Area	0.4	mi ²	Denison (2009) for Cells 2 through 4B
Latitude	N 37°31'		Denison (2009)
Longitude	W 109°30'		Denison (2009)
Minimum Elevation	5600	ft	Denison (2009)

Updated Local-Storm PMP Estimates

Parameter	Value	Units	Comments
One-hour point precipitation PMP value	8.6	in	Jensen (1995) references Figure 4.7 in Hansen (1984).
Elevation Reduction	97	%	Jensen (1995) recommends same elevation reduction as used in Hansen (1984).
One-Hour PMP (adjusted for elevation)	8.3	in	This is the same value presented in Denison (2009)
6-hr to 1-hr Depth Percentage	115	%	Table 15 in Jensen (1995)
Six-Hour PMP	9.6	in	One-hour PMP multiplied by 6-hr to 1-hr depth percentage
Areal Reduction	100	%	Table 15 in Jensen (1995) for 1 sq. mi. area

RESULTS

One-Hour Duration PMP	8.3	in
Six-Hour Duration PMP	9.6	in

Updated Local-Storm PMP Incremental Values

Duration (hr)	Percentage of 1-hr PMP	Depth (in)	Incremental Depth (in)
0.25	50	4.2	4.2
0.5	74	5.5	1.3
0.75	90	7.5	2.0
1	100	8.3	0.8
2	110	9.1	0.8
3	112	9.3	0.2
4	113.5	9.4	0.1
5	114.5	9.5	0.1
6	115	9.6	0.1

Six-Hour Duration PMP	
Hourly Increments	Depth (in)
1st	0.1
2nd	0.2
3rd	8.3
4th	0.8
5th	0.1
6th	0.1

One-Hour Duration PMP	
15-Min. Increments	Depth (in)
1st	4.2
2nd	2.0
3rd	1.3
4th	0.8

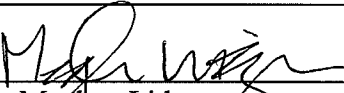
EXHIBIT C

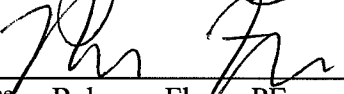
PROBABLE MAXIMUM PRECIPITATION (PMP) EVENT CALCULATION PACKAGE

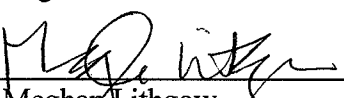
COMPUTATION COVER SHEET

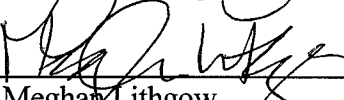
Client: DMC Project: White Mesa Mill – Cell 4B Project/
Proposal No.: SC0349
Task No.

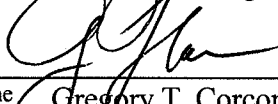
Title of Computations **PROBABLE MAXIMUM PRECIPITATION (PMP) EVENT
COMPUTATION**

Computations by: Signature  9/4/09
Printed Name Meghan Lithgow Date
Title Senior Staff Engineer

Assumptions and Procedures Checked by: Signature  9/9/09
(peer reviewer) Printed Name Rebecca Flynn, PE Date
Title Engineer

Computations Checked by: Signature  9/9/09
Printed Name Meghan Lithgow Date
Title Senior Staff Engineer

Computations backchecked by: Signature  9/9/09
(originator) Printed Name Meghan Lithgow Date
Title Senior Staff Engineer

Approved by: Signature  9/10/09
(pm or designate) Printed Name Gregory T. Corcoran, PE Date
Title Principal

Approval notes: _____

Revisions (number and initial all revisions)

No.	Sheet	Date	By	Checked by	Approval
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

Written by:	<u>M. Lithgow</u>	Date:	<u>09/04/09</u>	Reviewed by:	<u>G. Corcoran</u>	Date:	<u>9/10/09</u>
Client:	DMC	Project:	White Mesa Mill- Cell 4B	Project/ Proposal No.:	SC0349	Task No.:	02

**PROBABLE MAXIMUM PRECIPITATION (PMP) EVENT COMPUTATION
WHITE MESA MILL – CELL 4B
BLANDING, UTAH**

OBJECTIVE

The purpose of this calculation is to evaluate the local-storm Probable Maximum Precipitation (PMP) event for the White Mesa Mill Facility site located in Blanding, Utah. This calculation demonstrates that the probable maximum precipitation (PMP) event that the site will experience is 10 inches (0.83 ft) in 6 hours.

PMP COMPUTATION PROCEDURE

The Probable Maximum Precipitation (PMP) for the site was evaluated using “Hydrometeorological Report No. 49: Probable Maximum Precipitation Estimates, Colorado River and Great Basin Drainages” (Hansen, et. al., 1984). The use of this method is cited in a hydrology report that was prepared as part of an agreement between UMETCO and the Nuclear Regulatory Commission (NRC) during the permitting of Cell 4A (UMETCO, 1990).

PROBABLE MAXIMUM PRECIPITATION EVENT CALCULATIONS

Step 1: Calculate the Average 1-hr 1-mi² PMP for drainage using Figure 4.5

The average 1-hr 1-mi² PMP is 8.6-in (Attachment A, 1/7)

Step 2a: Reduce the 1-hr 1-mi² PMP event for elevation

If the lowest elevation within the drainage is above 5,000 feet (ft) above Mean Seal Level (MSL), decrease the PMP value from Step 1 by 5% for each 1,000 ft or proportionate fraction thereof above 5,000 ft to obtain the elevation adjusted drainage average 1-hr 1-mi² PMP.

The elevation of Cell 4B is 5,598 ft above MSL, which is conservatively the lowest elevation for the completed cells 2 through 4B; therefore, it is required to interpolate

Written by: M. Lithgow Date: 09/04/09 Reviewed by: G. Corcoran Date: 9/10/09
 Client: **DMC** Project: **White Mesa Mill-Cell 4B** Project/ Proposal No.: **SC0349** Task No.: **02**

between 95% and 100% using the following equation:

$$\frac{5\%}{1,000\text{ ft}} = \frac{x\%}{598\text{ ft}}; x = 3\% \text{ reduction}$$

$$100\% - 3\% = 97\%$$

Therefore, reduce the value obtained in Step 1 by 97%.

Step 2b: Multiply the number calculated in Step 1 by the number calculated in Step 2a.

$$8.6 \text{ inches} \times 0.97 = 8.3 \text{ inches}$$

Step 3: Determine the average 6/1-hr ratio for drainage using Figure 4.7

The average 6/1-hr ratio for drainage is approximately 1.2. (Attachment A, 2/7)

Step 4: Calculate the durational variation for 6/1-hr ratio of Step 3 using Table 4.4

The durational value is determined using Table 4.4 is as follows: (Attachment A, 3/7)

Duration (hr)								
1/4	1/2	3/4	1	2	3	4	5	6
74	89	95	100	110	115	118	119	120 %

Step 5: Multiply step 2b by Step 4 to calculate the 1-mi² PMP for indicated durations

For example, for the 1/4 hour duration: $8.3 \times 0.74 = 6.1$

The following numbers are calculated as follows:

Duration (hr)								
1/4	1/2	3/4	1	2	3	4	5	6
6.1	7.4	7.9	8.3	9.1	9.5	9.8	9.9	10.0 in.

Step 6: Determine the areal reduction using Figure 4.9 for the site:

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Client:	DMC	Project:	White Mesa Mill- Cell 4B	Project/ Proposal No.:	SC0349	Task No.:	02

First, determine the total watershed contributing to Cell 4B, including Cell 4B. The watershed areas of the upstream Cells 2, 3, and 4A are 87 acres (ac), 83 ac, and 40 ac, respectively and the proposed Cell 4B is 42 ac. Areas outside of these cells do not drain to Cell 4B and are therefore not part of the watershed area.

Total acreage is 87 ac + 83 ac + 42 ac + 42 ac = 254 acres.

Next, convert this number into square miles:

$$254 \text{ acre} \times \frac{43,560 \text{ ft}^2}{1 \text{ acre}} \times \frac{(1 \text{ mi})^2}{(5,280 \text{ ft})^2} = 0.40 \text{ mi}^2$$

Using Figure 4.9, the depth ratio of $\leq 1 \text{ mi}^2$ is 100 percent for each of the durations (Attachment A, 4/7).

Step 7: Multiply the duration values in Step 5 by the areal reduction in Step 6 to calculate the areal reduced PMP.

This step is neglected because the depth ratio is 100 percent; therefore, the values obtained in Step 5 are not reduced.

Step 8: Calculate the incremental PMP using successive subtraction of the values in Step 7 for the hourly durations (1 hr through 6 hr) and 15-minute incremental durations (1/4 hr through 1 hr).

The incremental PMP is calculated in two separate steps; the incremental PMP is calculated on the first line for the hourly increments (hours 1 through 6) and then calculated on the second line for the 15-minute increments during the first hour of the storm. To determine the incremental PMP, the following formula is used:

$$PMP_{t \text{ to } t+1} = PMP_{t+1} - PMP_t, \text{ where } t = \text{time}$$

In this example, the PMP between the first interval and second interval is determined by subtracting the PMP for interval 1 from the PMP for the second interval, as calculated in Step 5. The following equation illustrates the calculation of the incremental PMP between hours 0 and 1:

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Client: DMC	Project: White Mesa Mill- Cell 4B	Project/ Proposal No.: SC0349	Task 02 No.:

$$PMP_1 - PMP_0 = 8.3 \text{ in} - 0 \text{ in.} = 8.3 \text{ in.}$$

The next equation illustrates the calculation of the incremental PMP between hours 1 and 2:

$$PMP_2 - PMP_1 = 9.1 \text{ in} - 8.3 \text{ in.} = 0.8 \text{ in.}$$

This calculation is continued until the following table is completed as shown for each PMP interval.

Duration (hr)									
1/4	1/2	3/4	1	2	3	4	5	6	
			8.3	0.8	0.4	0.2	0.1	0.1	in.
6.1	1.2	0.5	0.4						in.

Step 9: Order the incremental PMP in a sequence dictated by hourly and 15-minute increments using Table 4.7 (Attachment 5/7) and Table 4.8 (Attachment 6/7), respectively.

The incremental PMP calculated in Step 8 must now be arranged in a specific order to model the runoff generated by the storm event. This order is dictated by Table 4.7 for the hourly PMP intervals and Table 4.8 for the 15-minute PMP intervals.

The final arrangement of the numbers determined in Step 8 is as follows:

Hourly increments:	0.1	0.4	8.3	0.8	0.2	0.1	in.
15-minute increments:	6.1	1.2	0.5	0.4			in.

The storm's 6 hour PMP runoff event is calculated by summing the incremental PMP for each hour of the storm.

$$0.1 \text{ in.} + 0.4 \text{ in.} + 8.3 \text{ in.} + 0.8 \text{ in.} + 0.2 \text{ in.} + 0.1 \text{ in.} = 9.9 \text{ inches (10 inches).}$$

This step is repeated to calculate the runoff generated during the first hour of the storm.

$$6.1 \text{ in.} + 1.3 \text{ in.} + 0.5 \text{ in.} + 0.4 \text{ in.} = 8.3 \text{ inches}$$

Written by:	<u>M. Lithgow</u>	Date:	<u>09/04/09</u>	Reviewed by:	<u>G. Corcoran</u>	Date:	<u>9/10/09</u>
Client:	DMC	Project:	White Mesa Mill- Cell 4B	Project/ Proposal No.:	SC0349	Task No.:	02

Because $9.9 > 8.3$, the runoff generated from the 6 hour storm (9.9 inches) is used.

CONCLUSIONS AND RECOMMENDATIONS

Our calculations are summarized in a worksheet modeled after Table 6.3A in the Hydrometeorological Report No. 49 and is provided as Attachment A, 7/7. Our analysis determined the Probable Maximum Precipitation (PMP) event generates 10 inches (0.83 ft) over 6 hours.

REFERENCES

UMETCO Minerals Corporation, 1990, "White Mesa Mill Drainage Report for Submittal to NRC."

Attachment A

Hansen, E. Marshall, Schwartz, Francis K., Riedel, John T., 1984. "Hydrometeorological Report No. 49: Probable Maximum Precipitation Estimates, Colorado River and Great Basin Drainages," Hydrometeorological Branch Office of Hydrology National Weather Service, U.S. Department of Commerce, National Oceanic and Atmosphere Administration, U.S. Department of Army Corps of Engineers, Silver Springs, Md.

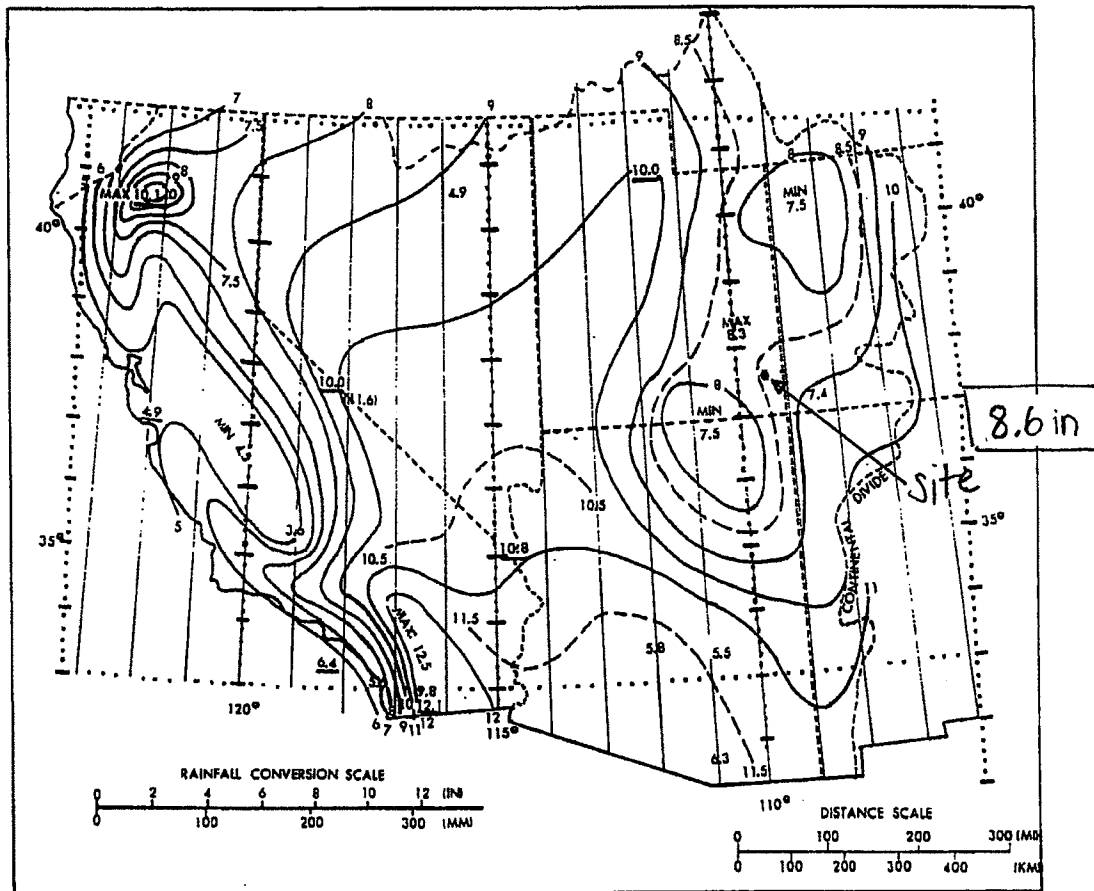


Figure 4.5--Local-storm PMP for 1 mi² (2.6 km²) 1 hr. Directly applicable for locations between sea level and 5000 ft (1524 m). Elevation adjustment must be applied for locations above 5000 ft.

events. In contrast to figure 4.4, figure 4.5 maintains a maximum between these two locations. There is no known meteorological basis for a different solution. The analysis suggests that in the northern portion of the region maximum PMP occurs between the Sierra Nevada on the west and the Wasatch range on the east.

A discrete maximum (> 10 inches, 254 mm) occurs at the north end of the Sacramento Valley in northern California because the northward-flowing moist air is increasingly channeled and forced upslope. Support for this PMP center comes from the Newton, Kennett, and Red Bluff storms (fig. 4.1). Although the analysis in this region appears to be an extension of the broad maximum through the center of the Southwestern Region, it does not indicate the direction of moist inflow. The pattern has evolved primarily as a result of attempts to tie plotted maxima into a reasonable picture while considering inflow directions, terrain effects, and moisture potential.

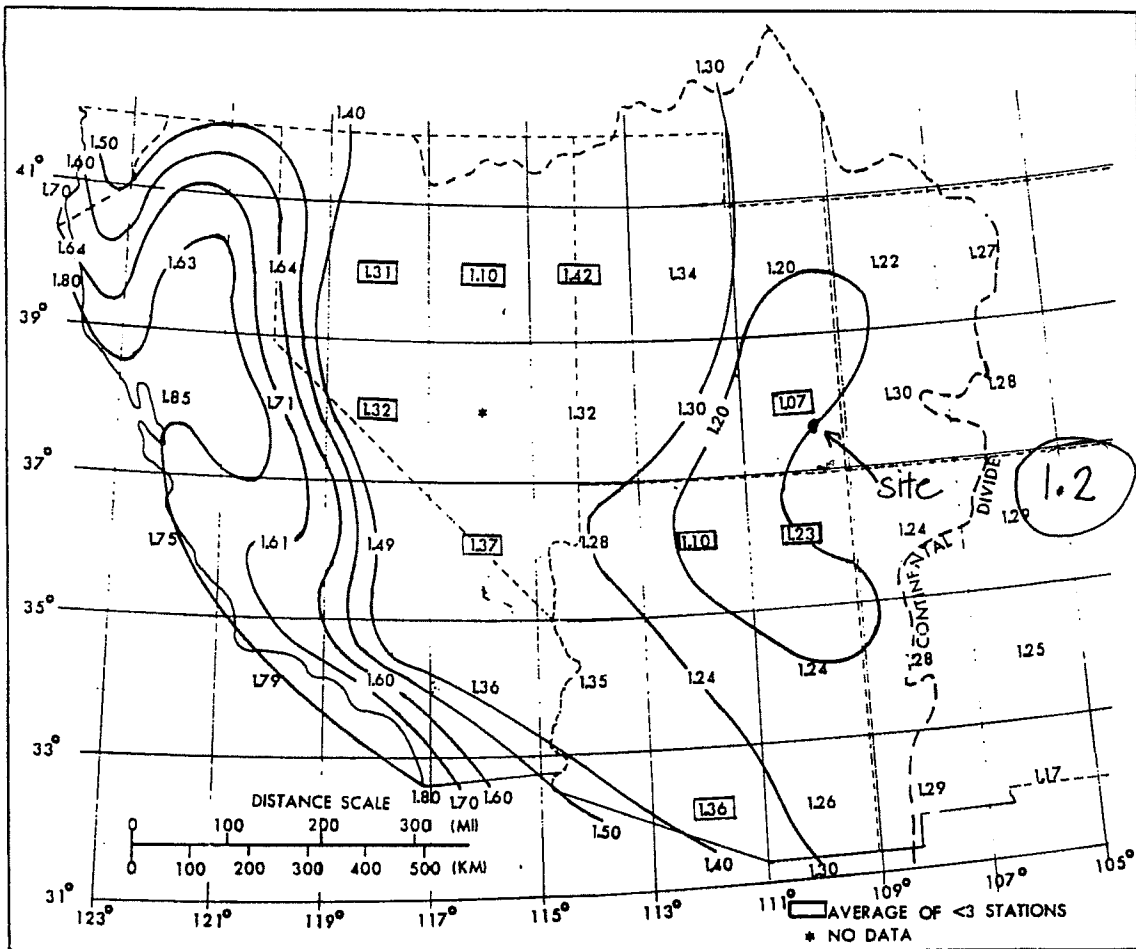


Figure 4.7.--Analysis of 6/1-hr ratios of averaged maximum station data (plotted at midpoints of a 2° latitude-longitude grid).

establish the basic depth-duration curve, then structure a variable set of depth-duration curves to cover the range of 6/1-hr ratios that are needed.

Three sets of data were considered for obtaining a base relation (see table 4.3 for depth-duration data).

a. An average of depth-duration relations from each of 17 greatest 3-hr rains from summer storms (1940-49) in Utah (U. S. Weather Bureau 1951b) and in unpublished tabulations for Nevada and Arizona (1940-63). The 3-hr amounts ranged from 1 to 3 inches (25 to 76 mm) in these events.

b. An average depth-duration relation from 14 of the most extreme short-duration storms listed in Storm Rainfall (U. S. Army, Corps of Engineers 1945-). These storms come from Eastern and Central States and have 3-hr amounts of 5 to 22 inches (127 to 559 mm).

ratios than storms with high 3/1-hr ratios. The geographical distribution of 15-min to 1-hr ratios also were inversely correlated with magnitudes of the 6/1-hr ratios of figure 4.7. For example, Los Angeles and San Diego (high 6/1-hr ratios) have low 15-min to 1-hr ratios (approximately 0.60) whereas the 15-min to 1-hr ratios in Arizona and Utah (low 6/1-hr ratios) were generally higher (approximately 0.75).

Depth-duration relations for durations less than 1 hour were then smoothed to provide a family of curves consistent with the relations determined for 1 to 6 hours, as shown in figure 4.3. Adjustment was necessary to some of the curves to provide smoother relations through the common point at 1 hour.

We believe we were justified in reducing the number of the curves shown in figure 4.3 for durations less than 1 hour, letting one curve apply to a range of 6/1-hr ratios. The corresponding curves have been indicated by letter designators, A-D, on figure 4.3. As an example, for any 6-hr amount between 115% and 135% of 1-hr, 1-mi² (2.6-km²) PMP, the associated values for durations less than 1 hour are obtained from the curve designated as "B".

Table 4.4 lists durational variations in percent of 1-hr PMP for selected 6/1-hr rain ratios. These values were interpolated from figure 4.3.

To determine 6-hr PMP for a basin, use figure 4.3 (or table 4.4) and the geographical distribution of 6/1-hr ratios given in figure 4.7.

Table 4.4.--Durational variation of 1-mi² (2.6-km²) local-storm PMP in percent of 1-hr PMP (see figure 4.3)

6/1-hr ratio	Duration (hr)								
	1/4	1/2	3/4	1	2	3	4	5	6
★ 1.1	86	93	97	100	107	109	110	110	110
1.2	74	89	95	100	110	115	118	119	120
1.3	74	89	95	100	114	121	125	128	130
1.4	63	83	93	100	118	126	132	137	140
1.5	63	83	93	100	121	132	140	145	150
1.6	43	70	87	100	124	138	147	154	160
1.8	43	70	87	100	130	149	161	171	180
2.0	43	70	87	100	137	161	175	188	200

4.5 Depth-Area Relation

We have thus far developed local-storm PMP for an area of 1 mi² (2.6 km²). To apply PMP to a basin, we need to determine how 1-mi² (2.6-km²) PMP should decrease with increasing area. We have adopted depth-area relations based on rainfalls in the Southwest and from consideration of a model thunderstorm.

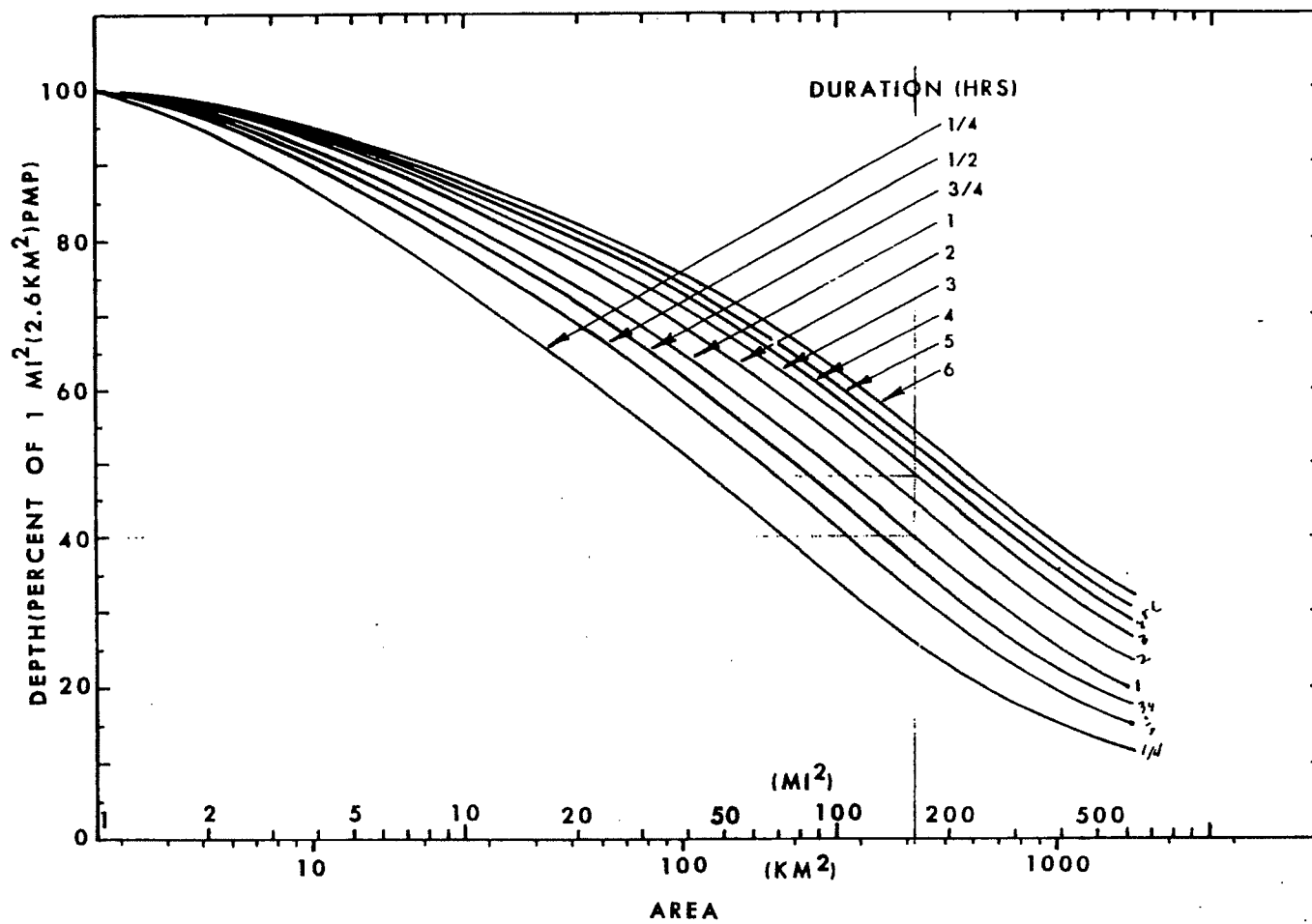
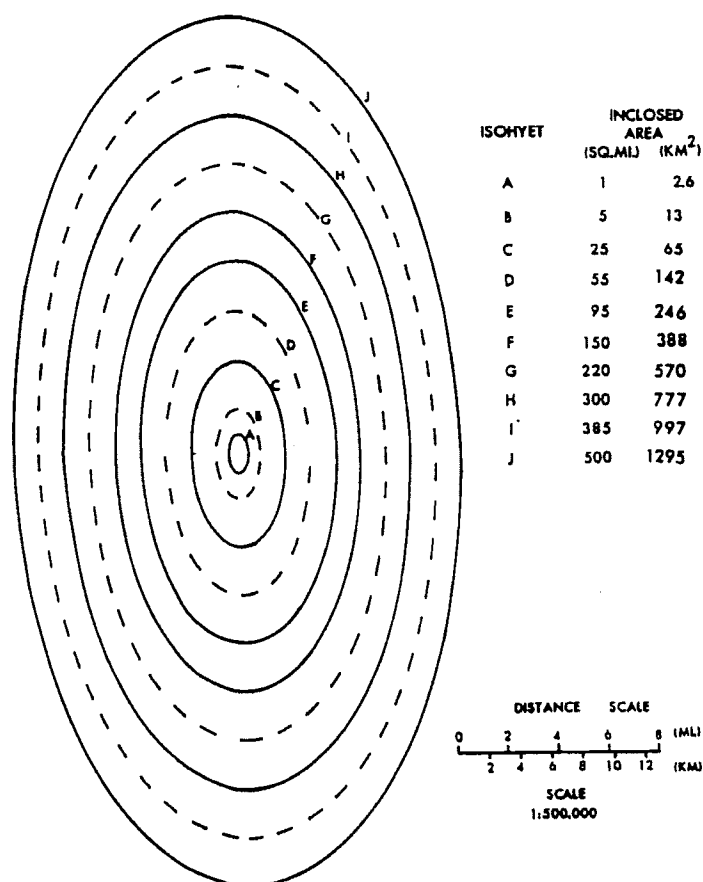


Figure 4.9.--Adopted depth-area relations for local-storm PMP.

Figure 4.10.--Idealized
local-storm isohyetal
pattern.



storm period. The sequence of hourly incremental PMP for the Southwest 6-hr thunderstorm in accord with this study is presented in column 2 of table 4.7. A small variation from this sequence is given in Engineering Manual 1110-2-1411 (U. S. Army, Corps of Engineers 1965). The latter, listed in column 3 of table 4.7, places greater incremental amounts somewhat more toward the end of the 6-hr storm period. In application, the choice of either of these distributions is left to the user since one may prove to be more critical in a specific case than the other.

Table 4.7.--Time sequence for hourly incremental PMP in 6-hr storm

★ HMR No. 5 ¹ EM1110-2-1411 ²			
Increment		Sequence Position	
Largest hourly amount	8.3	Third	Fourth
2nd largest	0.8	Fourth	Third
3rd largest	0.5	Second	Fifth
4th largest	0.2	Fifth	Second
5th largest	0.2	First	Last
least	0.1	Last	First

¹U. S. Weather Bureau 1947.

²U. S. Corps of Engineers 1952.

Also of importance is the sequence of the four 15-min incremental PMP values. We recommend a time distribution, table 4.8, giving the greatest intensity in the first 15-min interval (U.S. Weather Bureau 1947). This is based on data from a broad geographical region. Additional support for this time distribution is found in the reports of specific storms by Keppell (1963) and Osborn and Renard (1969).

Table 4.8.--Time sequence for 15-min incremental PMP within 1 hr.

Increment	Sequence Position
Largest 15-min amount	First
2nd largest	Second
3rd largest	Third
least	Last

4.8 Seasonal Distribution

The time of the year when local-storm PMP is most likely is of interest. Guidance was obtained from analysis of the distribution of maximum 1-hr thunderstorm events through the warm season at the recording stations in Utah, Arizona, and in southern California (south of 37°N and east of the Sierra Nevada ridgeline). The period of record used was for 1940-72 with an average record length for the stations considered of 27 years. The month with the one greatest thunderstorm rainfall for the period of record at each station was noted. The totals of these events for each month, by States, are shown in table 4.9.

Table 4.9.--Seasonal distribution of thunderstorm rainfalls.

(The maximum event at each of 108 stations, period of record 1940-72.)

	Month						No. of Cases
	M	J	J	A	S	O	
Utah	1	5	9	14	5		34
Arizona		4	16	19	4		43
S. Calif.*		14	10	7			31
No. of cases/mo.	1	23	35	40	9	0	

*South of 37°N and east of Sierra Nevada ridgeline.

Attachment A, 6/7

Table 6.3A -- Local-storm PMP computation, Colorado River, Great Basin and California drainages. For drainage average depth PMP.

Drainage: White Mesa Mill Facility, Cells 2 - 4B				Area		0.39		mi ²						
Latitude: N 37° 31'				Longitude: W 109° 30'		Min. Elevation		5598 ft						
1	Average 1-hr 1-mi ² (2.6-km ²) PMP for drainage [fig. 4.5]			8.6 in.										
2a.	Reduction for Elevation. [No adjustment for elevations up to 5,000 feet: 5% decrease per 1,000 feet above 5,000 feet.			0.97 %										
b.	Multiply step 1 by step 2a.			8.3 in.										
3.	Average 6/1-hr ratio for drainage [fig 4.7]			1.2										
				Duration (hr)										
				1/4	1/2	3/4	1	2	3	4	5	6		
4	Durational variation for 6/1-hr ratio of step 3 [table 4.4]			74	89	95	100	110	115	118	119	120	%	
5	1-mi ² (2.6 km ²) PMP for indicated durations [step 2b x step 4]			6.1	7.4	7.9	8.3	9.1	9.5	9.8	9.9	10.0		
6	Areal reduction [fig. 4.9]			100	100	100	100	100	100	100	100	100	%	
7	Areal reduced PMP [steps 5 x 6]			6.1	7.4	7.9	8.3	9.1	9.5	9.8	9.9	10.0	in.	
8	Incremental PMP [successive subtraction in step 7]			8.3		0.8	0.4	0.2	0.1	0.1	in.			
				6.1	1.2	0.5	0.4	} 15-min. increments						
9	Time sequence of incremental PMP to:													
Hourly increments [table 4.7]				0.1		0.4	8.3	0.8	0.2	0.1	in.			
				Total depth of 6 hour storm 9.9 in.										
Four largest 15-min increments [table 4.8]				6.1		1.2	0.5	0.4	in					
				Total depth of 1st hour of storm 8.3 in.										

ATTACHMENT G.2
SUPPORTING CALCULATIONS

Client: Energy Fuels Resources (USA) Inc.
Project: White Mesa Reclamation Plan
Detail: Erosion Protection

Job No.: 1009740
Date: 5/31/2011
Computed By: RTS

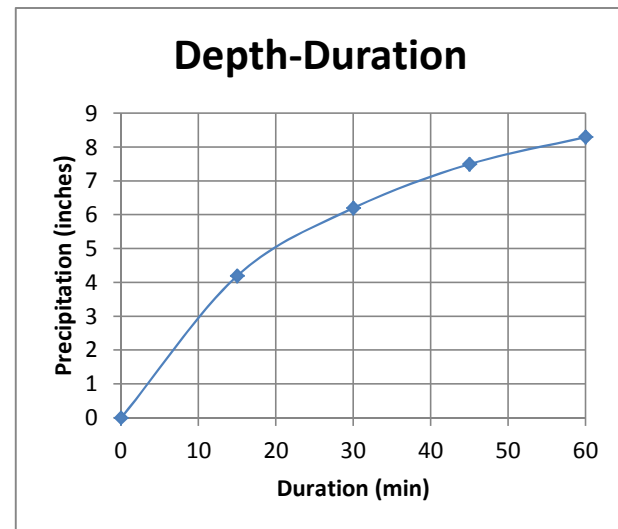
PMP Event

PMP calculation from "Re: Cell 4B Lining System Design Report, Response to DRC Request fo Additional Information - Round 3 Interrogatory, Cell 4B design", September 11,2009.

Procedure: Hydrometeorological Report No. 49: Probable Maximum Precipitation Estimates, Colorado river and Great Basin Drainages (Hansen et al., 1984), corrected for elevation and area.

Table 1. Estimated Precipitation Depths For Local-Storm PMP, White Mesa Mill, Utah Site

Hourly Increments	First Hour	Second Hour	Third Hour				Fourth Hour	Fifth Hour	Sixth Hour
PMP Depths (inches)	0.1	0.2	8.3				0.8	0.1	0.1
Third-Hour Component Depths (inches)			4.2	2.0	1.3	0.8			



Client: Energy Fuels Resources (USA) Inc.
 Project: White Mesa Reclamation Plan
 Detail: Erosion Protection

Job No.: 1009740
 Date: 8/22/2015
 Computed By: TMS/MMD

Time of Concentration

1-hour PMP (in) 8.3

Flow Path 1: flow path across longest 5H:1V side slope in Cell 4A

Description	Slope (feet/feet)	Slope Length (feet)	Time of Concentration (minutes)				% of 1-hour PMP	PD _{PMP} (in)	Intensity (in/hr)
			Kirpich	SCS	Brant and Oberman	Average			
Cell 2 at 0.5%	0.005	570	7.9	8.0	11.8	9.2	61.3	5.08	33.0
Cell 3 top	0.005	870	18.9	19.0	25.4	21.1	82.3	6.83	19.4
Cell 4A top	0.008	1200	30.7	30.7	38.4	33.3	91.2	7.57	13.7
Cell 4A side slope	0.2	230	31.7	31.7	41.0	34.8	92.0	7.6	13.2

Note: Flow accumulates as it flows from Cell 2 to Cell 4A. Design flow path is longest path across maximum 5H:1V side slope

Flow Path 2: longest flow path across cells across cells 2, 3, 4A and 4B

Description	Slope (feet/feet)	Slope Length (feet)	Time of Concentration (minutes)				% of 1-hour PMP	PD _{PMP} (in)	Intensity (in/hr)
			Kirpich	SCS	Brant and Oberman	Average			
Cell 2 at 1%	0.01	900	8.6	8.7	10.9	9.4	61.8	5.13	32.7
Cell 2 at 0.5%	0.005	550	16.4	16.4	22.6	18.5	79.3	6.58	21.4
Cell 3 top	0.005	830	27.0	27.0	36.0	30.0	89.4	7.42	14.8
Cell 4A top	0.008	1200	38.7	38.8	49.0	42.2	95.0	7.88	11.2
Cell 4A side slope	0.2	100	39.2	39.3	50.9	43.2	95.3	7.9	11.0

Note: Flow accumulates as it flows from Cell 2 to Cell 4A. Design flow path is longest path across Cell 2, 3, and 4A, and not the longest flow path across each individual cell

Cell 2 and Side slopes that only drain area of slope

Description	Slope (feet/feet)	Slope Length (feet)	Time of Concentration (minutes)				% of 1-hour PMP	PD _{PMP} (in)	Intensity (in/hr)
			Kirpich	SCS	Brant and Oberman	Average			
Cell 2 Top 1% Slope	0.01	830	8.1	8.1	10.6	9.0	60.4	5.0	33.6
Cell 2 Northern .5% Slope	0.005	250	12.3	12.3	19.6	14.8	73.8	6.1	24.9
Cell 1 Disposal 1% Slope	0.01	230	15.4	15.4	26.6	19.1	80.1	6.6	20.9
Cell 1 Northern Side Slope	0.2	90	15.8	15.8	28.4	20.0	81.1	6.7	20.2
Non-Accumulating Side Slopes	0.2	50	0.3	0.3	1.5	2.5	27.5	2.3	54.8

Note: These are the slopes on the sides of Cells 4A, 4B, 3, and 2

Flow Path 3: Flow Path Across Cell 1

Description	Slope (feet/feet)	Slope Length (feet)	Time of Concentration (minutes)				% of 1-hour PMP	PD _{PMP} (in)	Intensity (in/hr)
			Kirpich	SCS	Brant and Oberman	Average			
Cell 1 at .1%	0.001	2232	42.2	42.3	31.9	38.8	93.7	7.8	12.0

Source: Brant and Oberman(1975) as presented in UMTRA TAD (1989)

Formula: $t_c = C(L/S)^{1/3}$

Source: Kirpich (1940) as presented in NUREG 4620

Formula: $t_c = 0.00013 \cdot L^{0.77} / S^{0.385}$ with L in feet, t_c in hours

Source: SCS as presented in NUREG 4620

Formula: $t_c = (11.9L^3/H)^{0.385}$ with L in miles, H in feet, t in hours

% of one-hour PMP = $RD / (0.0089 \cdot RD + 0.0686)$ for $t_c < 15$ min based on Table 4.1 of TAD

Cell geometry based on Figure G.1

Client: Energy Fuels Resources (USA) Inc.
 Project: White Mesa Reclamation Plan
 Detail: Erosion Protection

Job No.:
 Date:
 Computed By:

1009740
 8/22/2015
 TMS/MMD

Unit discharge of PMP

Flow Path 1: flow path across longest 5H:1V side slope in Cell 4A

Description	Total Drainage Length (ft)	C	Tc (min)	Intensity (in/hr)	unit discharge (cfs/ft)
Cell 2 at 0.5%	570	1	9.2	33.0	0.43
Cell 3 top	1440	1	21.1	19.4	0.64
Cell 4A top	2640	1	33.3	13.7	0.83
Cell 4A side slope	2870	1	34.8	13.2	0.87

Note: Flow accumulates as it flows from Cell 2 to Cell 4A

Flow Path 2: longest flow path across cells with 0.8% top slope across cells 4A and 4E

Description	Total Drainage Length (ft)	C	Tc (min)	Intensity (in/hr)	unit discharge (cfs/ft)
Cell 2 at 1%	900	1	9.4	32.7	0.68
Cell 2 at 0.5%	1450	1	18.5	21.4	0.71
Cell 3 top	2280	1	30.0	14.8	0.78
Cell 4A top	3480	1	42.2	11.2	0.90
Cell 4A side slope	3580	1	42.2	11.2	0.92

Note: Flow accumulates as it flows from Cell 2 to Cell 4A

Side Slope Flow Paths

Description	Total Drainage Length (ft)	C	Tc (min)	Intensity (in/hr)	unit discharge
Cell 2 Northern 1% Slope	830	1	9.0	33.6	0.64
Cell 2 Northern .5% Slope	1080	1	14.8	24.9	0.62
Cell 1 Disposal 1% Slope	1310	1	19.1	20.9	0.63
Cell 1 Disposal Side Slope	1400	1	20.0	20.2	0.65
Non-Accumulating Side Slopes	50	1	2.5	54.8	0.06
Cell 1 at .1%	2232	1	38.8	12.0	0.62

Client:
Project:
Detail:

Energy Fuels Resources (USA) Inc.
White Mesa Reclamation Plan
Erosion Protection

Job No.:
Date:
Computed By:

1009740
8/22/2015
TMS/MMD

Temple Method for Vegetated Slopes - Top Soil

Reference: Temple, D.M., Robinson, K.M., Ahling, R.M., and Davis, A.G., 1987. Stability Design of Grass-Lined Open Channels, USDA Handbook 667.
And as presented in UMTRA TAD Section 4.3.3 and NUREG 1623, Appendix A

Area	Cell 2 at 0.5%	Cell 3 top
PMP Design flow (cfs/ft)	0.71	0.78
Concentration Factor, F	3	3
PMP Design flow (cfs/ft), q	2.14	2.33
Slope, S (ft/ft)	0.005	0.005
average dry density (pcf)	100	100
average specific gravity	2.61	2.61
void ratio, e	0.629	0.629
unit weight water (pcf)	62.4	62.4

(estimated from laboratory testing)
(estimated from laboratory testing)

Topsoil Description	topsoil	topsoil
Plasticity index, PI	<10	<10
base allowable tractive shear stress (psf) τ_{ab} =	na	na
void ratio correction factor, C_e =	na	na
allowable tractive shear stress (psf), τ_a =	0.020	0.020
Long-term, PMP precip		
Repr. stem length (ft) h(ave)		
good veg	2	2
poor veg	1	1
Repr. stem density (stems/sq ft), M(ave)		
good veg	200	200
poor veg	67	67
Retardance curve index, Ci		
good veg	7.62	7.62
poor veg	5.03	5.03
Cover factor, Cf		
good veg	0.75	0.75
poor veg	0.375	0.375
allowable vegetated shear strength (psf), τ_{va}		
good veg	5.71	5.71
poor veg	3.78	3.78
Mannings n for soil roughness, n_s =	0.0156	0.0156
Mannings n for vegetal conditions, n_r		
good veg	0.0916	0.0872
poor veg	0.0503	0.0487
Mannings n for vegetated slopes, n_v		
good veg	0.0916	0.0872
poor veg	0.0503	0.0487
assumed depth of flow, d (ft)		
good veg	1.452	1.485
poor veg	1.013	1.047
calculated q (cfs/ft), with veg		
good veg	2.14	2.33
poor veg	2.14	2.33
qcalc - qdesign		
good veg	0.00	0.00
poor veg	0.00	0.00
Iterate with d until q calc equals q design		
velocity (ft/s), v		
good veg	1.47	1.57
poor veg	2.11	2.23
effective shear stress (psf), τ_e		
good veg	0.0033	0.0037
poor veg	0.0190	0.0210
effective veg shear stress (psf) τ_{ve}		
good veg	0.4497	0.4597
poor veg	0.2970	0.3056
shear stress ratio, vegetated slope		
good veg	12.7	12.4
poor veg	12.7	12.4
shear stress ratio, soil on vegetated slope		
good veg	6.1	5.4
poor veg	1.1	1.0

(from laboratory testing)

pg 36 and 39 of Temple et al. (1987)

Temple Table 3.1, grass mixture

Temple Table 3.1, grass mixture
assume min 30% coverage

Client: Energy Fuels Resources (USA) Inc.
Project: White Mesa Reclamation Plan
Detail: Erosion Protection

Job No.: 1009740
Date: 8/22/2015
Computed By: TMS/MMD

Temple Method for Vegetated Slopes - Top Soil Ammended with 25% Gravel

Reference: Temple, D.M., Robinson, K.M., Ahning, R.M., and Davis, A.G., 1987. Stability Design of Grass-Lined Open Channels, USDA Handbook 667.
And as presented in UMTRA TAD Section 4.3.3 and NUREG 1623, Appendix A

Area	Cell 1 at 1%	Cell 2 at 1%	Cell 4A top
PMP Design flow (cfs/ft)	0.63	0.68	0.87
Concentration Factor, F	3	3	3
PMP Design flow (cfs/ft), q	1.88	2.03	2.60
Slope, S (ft/ft)	0.01	0.01	0.008
average dry density (pcf)	106	106	106
average specific gravity	2.62	2.62	2.62
void ratio, e	0.542	0.542	0.542
unit weight water (pcf)	61.4	62.4	62.4

(estimated from laboratory testing)
(estimated from laboratory testing)

Topsoil Description	Topsoil with 25% 1"-minus gravel	Topsoil with 25% 1"-minus gravel	Topsoil with 25% 1"-minus gravel
d75 (inches)	0.2	0.2	0.2
base allowable tractive shear stress (psf) τ_{ab} =	na	na	na
void ratio correction factor, C_e =	na	na	na
allowable tractive shear stress (psf), τ_a =	0.080	0.080	0.080
Long-term, PMP precip			
Repr. stem length (ft) h(ave)			
good veg	2	2	2
poor veg	1	1	1
Repr. stem density (stems/sq ft), M(ave)			
good veg	200	200	200
poor veg	67	67	67
Retardance curve index, C_i			
good veg	7.62	7.62	7.62
poor veg	5.03	5.03	5.03
Cover factor, C_f			
good veg	0.75	0.75	0.75
poor veg	0.375	0.375	0.375
allowable vegetated shear strength (psf), τ_{va}			
good veg	5.71	5.71	5.71
poor veg	3.78	3.78	3.78
Mannings n for soil roughness, n_s =	0.0196	0.0196	0.0196
Mannings n for vegetal conditions, n_r			
good veg	0.0986	0.0944	0.0821
poor veg	0.0528	0.0513	0.0468
Mannings n for vegetated slopes, n_v			
good veg	0.0993	0.0952	0.0829
poor veg	0.0541	0.0526	0.0482
assumed depth of flow, d (ft)			
good veg	1.148	1.169	1.338
poor veg	0.797	0.819	0.966
calculated q (cfs/ft), with veg			
good veg	1.88	2.03	2.60
poor veg	1.88	2.03	2.60
qcalc - qdesign			
good veg	0.00	0.00	0.00
poor veg	0.00	0.00	0.00
Iterate with d until q calc equals q design			
velocity (ft/s), v			
good veg	1.64	1.73	1.95
poor veg	2.36	2.47	2.69
effective shear stress (psf), τ_e			
good veg	0.0068	0.0077	0.0093
poor veg	0.0401	0.0442	0.0497
effective veg shear stress (psf) τ_{ve}			
good veg	0.6978	0.7219	0.6587
poor veg	0.4494	0.4672	0.4328
shear stress ratio, vegetated slope			
good veg	8.2	7.9	8.7
poor veg	8.4	8.1	8.7
shear stress ratio, soil on vegetated slope			
good veg	11.7	10.4	8.6
poor veg	2.0	1.8	1.6

from preliminary
gradation specs

pg 36 and 39 of Temple et al. (1987)

Temple Table 3.1, grass mixture

Temple Table 3.1, grass mixture
assume min 30% coverage

Client:	Energy Fuels Resources (USA) Inc.	Job No.:	1009740
Project:	White Mesa Reclamation Plan	Date:	8/22/2015
Detail:	Erosion Protection	Computed By:	TMS/MMD

Abt and Johnson method (Abt and Johnson, 1991) applicable for slopes of 50% or less.

Angular-Shaped rock sizing equation:
For rounded rock, increase size by 40%.

$$D_{50} = 5.235^{0.43} q_{design}^{0.56} \quad q_{design} = 1.35 q_f$$

Area	Cell 4A Flow Path 2 Southern Side Slope - Angular	Non-Accumulating Side Slopes - Rounded	Cell 2 Northern Side Slope - Angular
Side Slope (ft/ft)	0.2	0.2	0.2
angle α (rad)	0.197	0.197	0.197
PMP unit flow (cfs/ft)	0.87	0.06	0.65
Concentration Factor	3	3	3
Coef. Of Movement	1.35	1.35	1.35
design flow (cfs/ft)	3.51	0.25	2.63
Coef. Of Uniformity	NA	NA	NA
design flow over rock (cfs/ft)	3.51	0.25	2.63
D50 (inches)	5.29	1.70	4.49

Client: Energy Fuels Resources (USA) Inc.
Project: White Mesa Reclamation Plan
Detail: Erosion Protection

Job No.: 1009740
Date: 8/22/2015
Computed By: TMS/MMD

Preliminary Gradations

This spreadsheet calculates preliminary gradations of riprap based on D50

Source: NUREG 4620

Source: USDA, National Engineering Handbook, Part 633, Chapter 26, Gradation Design of Sand and Gravel Filters, October 1994.

Area Description	Cell 4A side slope	Comment
Minimum D50 (in)	4.49	Assuming Angular Rock, Safety Factor Method for Top Slope, Abt and Johnson (1991) method for side slopes
		Based on constructability: 1.5 to 2*D50. May consider 12"
Rock thickness (in)	8.99	as minimum thickness for rock
Maximum D50 (in)	5.99	Based on constructability: Thickness/1.5
Maximum D50 (in)	22.47	Prevent gap-grading: minimum D50*5
Maximum D50 (in)	5.99	Smaller of two above criteria
Maximum D100 (in)	8.99	Based on constructability: 1*Thickness
Maximum D100 (in)	29.96	Based on internal stability?: 5*maximum D50
Maximum D100 (in)	8.99	Smaller of two above criteria
Minimum D100 (in)	6.74	1.5*minimum D50
Minimum D15 (in)	0.56	Based on internal stability: Maximum D100/16
Maximum D15 (in)	2.81	Prevent gap-grading: Minimum D15*5
Minimum D60 (in)	6.29	Prevent gap-grading: D60/D10<=6
Maximum D60 (in)	8.39	Prevent gap-grading: D60/D10<=6
Minimum D10 (in)	1.05	Prevent gap-grading: D60/D10<=6
Maximum D10 (in)	1.40	Prevent gap-grading: D60/D10<=6

Client: Energy Fuels Resources (USA) Inc.
Project: White Mesa Reclamation Plan
Detail: Erosion Protection

Job No.: 1009740
Date: 8/22/2015
Computed By: TMS/MMD

Interstitial Velocities

Source: NUREG 1623, Section D
 Abt, SR, JF Ruff, RJ Wittler (1991). Estimating Flow Through Riprap, Journal of Hydraulic Engineering, Vol. 117, No. 5, May.

Description	Non-Accumulating Side Slopes - Rounded	Cell 1 Disposal Area Side Slope - Angular	Cell 4A Flow Path 2 Southern Side Slope - Angular
Minimum D50 (inches)	1.70	4.49	5.29
Minimum D10 (inches)	0.40	1.05	1.23
Maximum D10 (inches)	0.53	1.40	1.65
Slope (ft/ft)	0.2	0.20	0.20
Min Velocity (ft/s)	0.37	0.60	0.65
Max Velocity (ft/s)	0.43	0.69	0.75
Underlying filter required?	No	Recommended	Recommended

from Safety Factor Method, or Abt/Johnson Method, assuming rounded rock
 from preliminary gradation specs
 from preliminary gradation specs
 from preliminary design
 calculated from Abt et al. (1991) based on Min D10
 calculated from Abt et al. (1991) based on Max D10

Per NUREG 1623, Appendix D, section 2.1.1

Client: Energy Fuels Resources (USA) Inc.
Project: White Mesa Reclamation Plan
Detail: Erosion Protection

Job No.: 1009740
Date: 7/9/2012
Computed By: TMS

USDA Filter Gradation Calculations - 2010 Material Testing

Step 1: Plot Gradation Curve of Base Soil

Stockpile ID	E4 (Field ID 2)		E5 (Field ID 3)		E6 (Field ID 4)		E7 (Field ID 5)		E8 (Field ID 6)		W9 (Field ID 7)		W7 (Field ID 8)		W1 (Field ID 12)		W2 (Field ID 13)	
Description	Sandy Clay Random Fill		Sandy Clay Random Fill		Clay Random Fill		Sandy Clay Random Fill		Sandy Clay Random Fill		Sandy Clay Random Fill		Sandy Clay Random Fill		Sandy Clay Random Fill		Sandy Clay Random Fill	
Sieve Sizes	Diameter (mm)	% Finer	Diameter (mm)	% Finer	Diameter (mm)	% Finer	Diameter (mm)	% Finer	Diameter (mm)	% Finer	Diameter (mm)	% Finer	Diameter (mm)	% Finer	Diameter (mm)	% Finer	Diameter (mm)	% Finer
1 1/2"	38.1	100	38.1	100	38.1	100	38.1	100	38.1	100	38.1	100	38.1	100	38.1	100	38.1	100
1"	25.4	100	25.4	100	25.4	100	25.4	100	25.4	100	25.4	100	25.4	100	25.4	100	25.4	100
3/4"	19.1	100	19.1	100	19.1	100	19.1	100	19.1	100	19.1	100	19.1	100	19.1	100	19.1	100
3/8"	9.8	100	9.8	100	9.8	100	9.8	100	9.8	100	9.8	100	9.8	100	9.8	100	9.8	100
Nº 4	4.75	99.9	4.75	100	4.75	99.9	4.75	100	4.75	100	4.75	100	4.75	100	4.75	100	4.75	99.8
Nº 10	2	99.8	2	99.9	2	99.9	2	100	2	100	2	100	2	99.3	2	100	2	99.7
Nº 20	0.85	98.9	0.85	99.2	0.85	99.2	0.85	100	0.85	99	0.85	99.3	0.85	98.8	0.85	99.5	0.85	97.4
Nº 40	0.425	97.7	0.425	97.9	0.425	96.9	0.425	99.7	0.425	97.4	0.425	98.3	0.425	98.1	0.425	98.8	0.425	94.7
Nº 60	0.25	95.1	0.25	93.1	0.25	92.6	0.25	98.8	0.25	91.9	0.25	96.1	0.25	94.4	0.25	97.8	0.25	88.2
Nº 100	0.15	90.8	0.15	80.9	0.15	88.8	0.15	96.7	0.15	74.7	0.15	92.3	0.15	79.4	0.15	95.2	0.15	76.6
Nº 200	0.075	58.8	0.075	64.5	0.075	82.2	0.075	69.8	0.075	53	0.075	62.6	0.075	56.2	0.075	59.4	0.075	58.3

D15 estimated as 0.025

All Steps below are from USDA Ch. 26 Example 26-2A

Step 4. Base Soil Category		2		2		2		2		2		2		2		2		2
D85	0.14		0.18		0.11		0.12		0.21		0.13		0.19		0.13		0.22	
Step 5. Filtering Criteria (Max D15) (mm)		0.70		0.70		0.70		0.70		0.70		0.70		0.70		0.70		0.70
Step 6. Min D15		0.08		0.07		0.05		0.06		0.08		0.07		0.08		0.08		0.08
Step 7. Ratio		9.15		10.03		12.79		10.86		8.24		9.74		8.74		9.24		9.07
Control Point 1 (D15max)		0.38		0.35		0.27		0.32		0.42		0.36		0.40		0.38		0.39
Control Point 2 (D15min)		0.08		0.07		0.05		0.06		0.08		0.07		0.08		0.08		0.08
Step 8. MaxD10		0.32		0.29		0.23		0.27		0.35		0.30		0.33		0.32		0.32
CP3 Max D60		1.91		1.74		1.37		1.61		2.12		1.80		2.00		1.89		1.93
CP4 Min D60		0.38		0.35		0.27		0.32		0.42		0.36		0.40		0.38		0.39
Step 9. CP5 D5min		0.08		0.08		0.08		0.08		0.08		0.08		0.08		0.08		0.08
CP6 D100 max		75.00		75.00		75.00		75.00		75.00		75.00		75.00		75.00		75.00
Step 10. CP7 D10		0.06		0.06		0.05		0.05		0.07		0.06		0.07		0.06		0.06
CP8 D90		20.00		20.00		20.00		20.00		20.00		20.00		20.00		20.00		20.00
For Plotting:		4.75		100.00														

Step 11. Connecting Control Points

	CP	E4 (Field ID 2)		E5 (Field ID 3)		E6 (Field ID 4)		E7 (Field ID 5)		E8 (Field ID 6)		W9 (Field ID 7)		W7 (Field ID 8)		W1 (Field ID 12)		W2 (Field ID 13)	
		D(mm)	% Finer	D(mm)	% Finer	D(mm)	% Finer	D(mm)	% Finer	D(mm)	% Finer	D(mm)	% Finer	D(mm)	% Finer	D(mm)	% Finer	D(mm)	% Finer
Fine Design Band (Upper)	4	0.382653	60	0.348837	60	0.273722628	60	0.32234957	60	0.424528	60	0.359425	60	0.400356	60	0.378787879	60	0.385935	60
	2	0.076531	15	0.069767	15	0.054744526	15	0.064469914	15	0.084906	15	0.071885	15	0.080071	15	0.075757576	15	0.077187	15
	5	0.075	5	0.075	5	0.075	5	0.075	5	0.075	5	0.075	5	0.075	5	0.075	5	0.075	5
Course Design	6	75	100	75	100	75	100	75	100	75	100	75	100	75	100	75	100	75	100
	3	1.913265	60	1.744186	60	1.368613139	60	1.611747851	60	2.122642	60	1.797125	60	2.001779	60	1.893939394	60	1.929674	60
	1	0.382653	15	0.348837	15	0.273722628	15	0.32234957	15	0.424528	15	0.359425	15	0.400356	15	0.378787879	15	0.385935	15
	7	0.063776	10	0.05814	10	0.045620438	10	0.053724928	10	0.070755	10	0.059904	10	0.066726	10	0.063131313	10	0.064322	10

Step 12. Determine Gradation from plot

Shaded boxes means these values were changed to meet the requirements from the references listed below.

References cited and listed in Appendix G

D50 base	0.06	0.06	0.05	0.05	0.07	0.06	0.07	0.06	0.06
D50 Fine Filter	0.31	0.29	0.23	0.27	0.35	0.30	0.33	0.31	0.32
D50 Course Filter	1.57	1.43	1.13	1.33	1.75	1.48	1.65	1.56	1.59

Nelson eqn 4.35	2.81	1.90	2.56	2.75	2.02	2.73	2.14	2.94	1.74
Cedergren eqn 5.3	24.67	24.67	24.67	24.67	24.67	24.67	24.67	24.67	24.67
Nelson eqn 4.36	2.81	1.90	2.56	2.75	2.02	2.73	2.14	2.94	1.74

Client: Energy Fuels Resources (USA) Inc
Project: White Mesa Reclamation Plan
Detail: Erosion Protection

Job No.: 1009740
Date: 7/9/2012
Computed By: TMS

USDA Filter Gradation Calculations - 2012 Material Testing

Step 1: Plot Gradation Curve of Base Soil

Field ID	E3-A		E5-B		E8-B		W2-A		W2-B		W5-A		W5-B		W8-A		W8-B		W9-B	
Description	Sandy Clay Random Fill		Sandy Clay Random Fill		Clay Random Fill		Sandy Clay Random Fill		Sandy Clay Random Fill		Sandy Clay Random Fill		Sandy Clay Random Fill		Sandy Clay Random Fill		Sandy Clay Random Fill		Sandy Clay Random Fill	
Sieve Sizes	Diameter (mm)	% Finer	Diameter (mm)	% Finer	Diameter (mm)	% Finer	Diameter (mm)	% Finer	Diameter (mm)	% Finer	Diameter (mm)	% Finer	Diameter (mm)	% Finer	Diameter (mm)	% Finer	Diameter (mm)	% Finer	Diameter (mm)	% Finer
2"	50.8	100	50.8	100	50.8	100	50.8	100	50.8	100	50.8	100	50.8	100	50.8	100	50.8	100	50.8	100
1"	25.4	100	25.4	100	25.4	81.93	25.4	93.18	25.4	100	25.4	100	25.4	82.21	25.4	85.17	25.4	75.41	25.4	100
3/4"	19.1	100	19.1	100	19.1	76.8	19.1	90.46	19.1	100	19.1	100	19.1	81.53	19.1	79.85	19.1	75.41	19.1	98.84
3/8"	9.8	100	9.8	99.31	9.8	66.01	9.8	79.02	9.8	100	9.8	99.64	9.8	75.03	9.8	71.12	9.8	69.81	9.8	97.64
Nº 4	4.75	99.56	4.75	98.46	4.75	60.03	4.75	69.56	4.75	99.89	4.75	99.08	4.75	70.97	4.75	65.34	4.75	68.41	4.75	94.13
Nº 10	2	97.56	2	97.21	2	56.18	2	59.53	2	99.72	2	97	2	66.88	2	59.49	2	66.04	2	89.65
Nº 20	0.85	95.84	0.85	96.11	0.85	54.66	0.85	53.25	0.85	99.46	0.85	95.03	0.85	64.04	0.85	55.59	0.85	63.76	0.85	86.42
Nº 40	0.425	94.66	0.425	95.19	0.425	52.56	0.425	49.39	0.425	98.73	0.425	93.04	0.425	59.3	0.425	48.97	0.425	58.56	0.425	84.16
Nº 60	0.25	92.35	0.25	93.34	0.25	47.28	0.25	43.49	0.25	96.47	0.25	88.27	0.25	45.76	0.25	33.93	0.25	47.26	0.25	80.58
Nº 100	0.15	86.48	0.15	89.93	0.15	39.4	0.15	34.43	0.15	94.12	0.15	83.32	0.15	38.09	0.15	20.12	0.15	39.94	0.15	75.53
Nº 200	0.075	76.74	0.075	82.68	0.075	28.78	0.075	25.11	0.075	61.5	0.075	50.38	0.075	26.77	0.075	13.78	0.075	28.17	0.075	50.1

Note: Areas with fields ID's E1-A and W4-B were topsoil samples and thus were not included in this analysis

All Steps below are from USDA Ch. 26 Example 26-2f

Step 4. Base Soil Category		2		2		3		3		2		2		3		4		3		2
D85	0.14		0.10		29.72		14.66		0.13		0.18		29.38		25.20		35.31		0.58	
Step 5. Filtering Criteria (Max D15) (mm)		0.70		0.70		53.73		35.21		0.70		0.70		62.53		100.79		67.20		0.70
Step 6. Min D15		0.10		0.10		0.16		0.18		0.10		0.10		0.17		0.27		0.16		0.10
Step 7. Ratio		7.00		7.00		343.64		196.48		7.00		7.00		371.98		368.62		420.65		7.00
Control Point 1 (D15max)		0.50		0.49		0.78		0.90		0.50		0.50		0.84		1.37		0.80		0.50
Control Point 2 (D15min)		0.10		0.10		0.16		0.18		0.10		0.10		0.17		0.27		0.16		0.10
Step 8. MaxD10		0.42		0.41		0.65		0.75		0.42		0.42		0.70		1.14		0.67		0.42
CP3 Max D60		2.50		2.45		3.91		4.48		2.50		2.50		4.20		6.84		3.99		2.50
CP4 Min D60		0.50		0.49		0.78		0.90		0.50		0.50		0.84		1.37		0.80		0.50
Step 9. CP5 D5min		0.08		0.08		0.08		0.08		0.08		0.08		0.08		0.08		0.08		0.08
CP6 D100 max		75.00		75.00		75.00		75.00		75.00		75.00		75.00		75.00		75.00		75.00
Step 10. CP7 min D10		0.08		0.08		0.13		0.15		0.08		0.08		0.14		0.23		0.13		0.08
CP8 D90		20		20		20		20		20		20		20		20		20		20
For Plotting:	4.75	100																		

Step 11. Connecting Control Points

	E3-A		E5-B		E8-B		W2-A		W2-B		W5-A		W5-B		W8-A		W8-B		W9-B	
CP	D(mm)	% Finer	D(mm)	% Finer	D(mm)	% Finer	D(mm)	% Finer	D(mm)	% Finer	D(mm)	% Finer	D(mm)	% Finer	D(mm)	% Finer	D(mm)	% Finer	D(mm)	% Finer
Fine Design Band (Upper)	4	0.5	60	0.49	60	0.782	60	0.896	60	0.5	60	0.840	60	1.367	60	0.799	60	0.5	60	0.5
	2	0.1	15	0.1	15	0.156	15	0.179	15	0.1	15	0.168	15	0.273	15	0.160	15	0.1	15	0.1
	5	0.075	5	0.075	5	0.075	5	0.075	5	0.075	5	0.075	5	0.075	5	0.075	5	0.075	5	0.075
Course Design Band (Lower)	6	75	100	75	100	75	100	75	100	75	100	75	100	75	100	75	100	75	100	75
	3	1.4	60	1.3	60	3.909	60	4.480	60	1.8	60	2.2	60	4.202	60	6.836	60	3.994	60	2.2
	1	0.5	15	0.49	15	0.782	15	0.896	15	0.5	15	0.840	15	1.367	15	0.799	15	0.5	15	0.5
7	0.083	10	0.083	10	0.130	10	0.149	10	0.083	10	0.083	10	0.140	10	0.228	10	0.133	10	0.083	10

Step 12. Determine Gradation from plot

Shaded boxes means these values were changed to meet the requirements from the references listed below

References cited and listed in Appendix G

D50 base	0.05	0.05	0.34	0.49	0.06	0.07	0.30	0.49	0.29	0.07
D50 Fine Filter	0.41	0.40	0.64	0.74	0.41	0.41	0.69	1.12	0.66	0.41
D50 Course Filter	1.20	1.12	3.21	3.68	1.51	1.82	3.46	5.62	3.28	1.82
Nelson eqn 4.35	3.61	4.95	0.03	0.06	3.88	2.72	0.03	0.05	0.02	0.86
Cedergren eqn 5.3	24.56	24.69	9.45	7.48	24.78	24.48	11.34	11.44	11.23	24.34
Nelson eqn 4.36	3.61	4.95	0.03	0.06	3.88	2.72	0.03	0.05	0.02	0.86

Client: Energy Fuels Resources (USA) Inc.
Project: White Mesa Reclamation Plan
Detail: Erosion Protection

Job No.: 1009740
Date: 8/22/2015
Computed By: TMS/MMD

Apron Protection

Source: Abt, SR, Johnson, TL, Thornton, CI, and Trabant, SC, Riprap Sizing at Toe of Embankment Slopes, Journal of Hydraulic Engineering, Vol. 124, No. 7, July 1998.

Equation: $D50 = 10.46 \cdot S^{0.43} \cdot qd^{0.56}$

	Apron C: Cell 2 Northern Side Slope	Apron B: Cell 4A Southern Side Slope	Apron A: Non- Accumulating Slopes	West
unit discharge (cfs/ft)	0.65	0.87	0.06	0.06
Cr	1	1	1	1
Cf	3	3	3	3
Cm	1.35	1.35	1.35	1.35
design discharge (cfs/ft)	2.63	3.51	0.25	0.25
Slope (ft/ft)	0.2	0.2	0.2	0.2
D50 Angular (in)	9.0	10.6	2.4	2.4
D50 Rounded (in)	12.6	14.8	3.4	3.4

Client: Energy Fuels Resources (USA) Inc.
Project: White Mesa Reclamation Plan
Detail: Erosion Protection

Job No.: 1009740
Date: 8/22/2015
Computed By: TMS/MMD

Interstitial Velocities - Apron

Source: NUREG 1623, Section D
 Abt, SR, JF Ruff, RJ Wittler (1991). Estimating Flow Through Riprap, Journal of Hydraulic Engineering, Vol. 117, No. 5, May.

Description	Non-Accumulating Side Slopes - Rounded	Cell 1 Disposal Area Side Slope - Angular	Cell 4A Flow Path 2 Southern Side Slope - Angular	
Minimum D50 (inches)	3.18	8.99	10.58	from Safety Factor Method, or Abt/Johnson Method, assuming rounded rock
Minimum D10 (inches)	0.74	2.10	2.47	from preliminary gradation specs
Maximum D10 (inches)	0.99	2.80	3.29	from preliminary gradation specs
Slope (ft/ft)	0.01	0.01	0.01	from preliminary design
Min Velocity (ft/s)	0.11	0.19	0.21	calculated from Abt et al. (1991) based on Min D10
Max Velocity (ft/s)	0.13	0.22	0.24	calculated from Abt et al. (1991) based on Max D10
Underlying filter required?	No	No	No	Per NUREG 1623, Appendix D, section 2.1.1

Client: Energy Fuels Resources (USA) Inc.
 Project: White Mesa Reclamation
 Detail: Erosion Protection

Job No.: 1009740
 Date: 8/22/2015
 Computed By: TMS/MMD

Modified Universal Soil Loss Equation (MUSLE)

Source : Clyde et al. (1978) as presented in NUREG 4620, section 5.1.2

$$A=R*K*LS*VM$$

Inputs for K factor		Topsoil	Rock Mulch	
Percent silt and very fine sand		43.6	32.7	from laboratory testing
Percent sand (0.10-2.0 mm)		39.2	29.4	from laboratory testing
Percent organic matter		1.5	1.5	
Soil structure Number		2	3	
Permeability		3	2	
Inputs for LS factor				
Slope length (ft)		1440	1200	from Figure G.1
slope steepness (%)		0.5	0.8	
m exponent		0.2	0.2	Table 5.2 of NUREG 4620

		Topsoil	Rock Mulch
R	Rainfall Factor	30	30
K	Soil Erodibility factor	0.28	0.12
LS	Topographic factor	0.16	0.18
VM	Dimensionless erosion control factor	0.4	0.4
A	Soil Loss (tons/acre/year)	0.54	0.27
A	Soil density (pcf)	100	106
A	Soil Loss (inches/1000 years)	3.0	1.4

From Table 5.1 of NUREG 4620 for eastern third of Utah

From nomograph Fig. 5.1 of NUREG 4620

From Table 5.3 of NUREG 4620 for seedings, 0-60 days

from laboratory testing

Client: Energy Fuels Resources (USA) Inc.
Project: White Mesa Mill
Detail: Discharge Channel

Job No.: 1009740
Date: 8/14/2012
Computed By: JMC

Peak Discharge of PMP precipitation

Description	Total Drainage Area (acres)	C	Tc (min)	Intensity (in/hr)	Q (cfs)
Sed-Channel	148.40	1	26.3	16.4	2440.1

Client: Energy Fuels Resources (USA) Inc.
Project: White Mesa Mill
Detail: Discharge Channel

Job No.: 1009740
Date: 8/14/2012
Computed By: JMC

Time of Concentration

1-hour PMP (in) 8.3

Description	Slope (feet/feet)	Path Length (feet)	Time of Concentration (minutes)				% of 1-hour PMP	PD _{PMP} (in)	Intensity (in/hr)
			Kirpich	SCS	Brant and Oberman	Average			
Sed-Channel	0.010	4600	30.1	30.2	18.7	26.3	86.9	7.21	16.4

Source: Brant and Oberman(1975) as presented in UMTRA TAD (1989)

Formula: $tc=C(L/Si^2)^{(1/3)}$.

Source:Kirpich (1940) as presented in NUREG 4620

Formula: $tc=0.00013*L^{0.77}/S^{0.385}$ with L in feet, tc in hours

Source: SCS as presented in NUREG 4620

Formula: $tc=(11.9L^3/H)^{0.385}$ with L in miles, H in feet, t in hours

% of one-hour PMP= $RD/(0.0089*RD+0.0686)$ for $tc<15$ min based on Table 4.1 of TAD

Cell geometry and grading based on REC-1 Reclamation Plan Revisions, September, 2011

Client: Energy Fuels Resources (USA) Inc.
Project: White Mesa Mill
Detail: Discharge Channel

Job No.: 1009740
Date: 8/2/2012
Computed By: JMC

Peak Channel Velocity

Design flow: 2,440 cfs

Trapezoid or triangular channels

slope (ft/ft)	0.009 ft/ft
Channel Side Slope 1 (ft/ft)	0.33 ft/ft
Channel Side Slope 2 (ft/ft)	0.33 ft/ft
bottom width	150 ft

Q	2,440 cfs
n native soils	0.020
Area of flow (A)	258.52 ft ²
Wetted Perimeter Slope 1 (P1)	5.32 ft
Wetted Perimeter Slope 2 (P2)	5.32 ft
Hydraulic Radius (R)	1.61 ft
Top Width (T)	160.1 ft
Maximum depth of flow (d)	1.67 ft
Q calc	2440.0 cfs
average velocity (v)	9.4 fps
unit discharge	15.74 cfs/ft

bedrock channel with minor irregularities

ok

8-10 fps ok

take as total Q divided by average flow width

Client: Energy Fuels Resources (USA) Inc.
Project: White Mesa Mill
Detail: Discharge Channel

Job No.: 1009740
Date: 8/14/2012
Computed By: JMC

Peak Channel Velocity

Design flow: 2,440 cfs

Trapezoid or triangular channels

slope (ft/ft)	0.009 ft/ft
Channel Side Slope 1 (ft/ft)	0.33 ft/ft
Channel Side Slope 2 (ft/ft)	0.33 ft/ft
bottom width	150 ft

Q	2,440 cfs
n native soils	0.030
Area of flow (A)	332.10 ft ²
Wetted Perimeter Slope 1 (P1)	6.77 ft
Wetted Perimeter Slope 2 (P2)	6.77 ft
Hydraulic Radius (R)	2.03 ft
Top Width (T)	162.9 ft
Maximum depth of flow (d)	2.12 ft
Q calc	2440.0 cfs
average velocity (v)	7.3 fps
unit discharge	15.60 cfs/ft

bedrock channel with moderate irregularities

ok
less than 8-10 fps ok
take as total Q divided by average flow width

Client:	Energy Fuels Resources (USA) Inc.	Job No.:	1009740
Project:	White Mesa Mill	Date:	8/2/2012
Detail:	Discharge Channel	Computed By:	JMC

Manning's N-value Determination

From US Department of the Interior, Bureau of Reclamation. Design of Small Dams. p. 595. 1987.

Basic N-value for channels in Rock	0.015
Modifications of N-value	0.005 Minor degree of irregularity
	0.010 Moderate degree of irregularity
	0.020 Severe irregularity

Based on seismic refraction data, test numbers 1-3, shear wave velocities ranged from 3100 to 7400 feet/sec (see test results from Nielsons, 1978, Appendix A D'Appolonia, 1979). The bedrock in the area c excavation is anticipated to range from soft and rippable to hard rock requiring blasting. The excavated rock surface will likely exhibit minor ro moderate irregularity.

Assume an N-value ranging from 0.020 0.030

From US Army Corps of Engineers. Hydraulic Design of Flood Control Channels, EM 1110-2-1601. p.2-16. June 1994.

From Table 2-5, Suggested Maximum Permissible Mean Channel Velocities

Poor Rock (usually sedimentary)	10.0 fps
Soft Sandstone	8.0 fps
Soft Shale	3.5 fps
Good Rock (usually igneous or hard metamorphic)	20.0 fps

The bedrock within the channel excavation is anticipated to consist of fine to medium-grained sandstone of varying cementation and weathering, or claystone. (see borings by Dames and Moore, 1978)

Based on the presumed rock type and the referenced table above, permissible mean channel velocities may range up to 8 to 10 fps.

ATTACHMENT G

SUPPORTING DOCUMENTATION FOR INTERROGATORY 11/1:

**REVISED APPENDIX D, VEGETATION AND BIOINTRUSION, TO THE UPDATED
TAILINGS COVER DESIGN REPORT (APPENDIX D OF THE RECLAMATION PLAN,
REVISION 5.0)**

ATTACHMENT G.1

**REVISED APPENDIX D, VEGETATION AND BIOINTRUSION, TO THE UPDATED
TAILINGS COVER DESIGN REPORT (APPENDIX D OF THE RECLAMATION PLAN,
REVISION 5.0)**

APPENDIX D

VEGETATION AND BIOTINTRUSION EVALUATION

D.1 INTRODUCTION

This appendix provides an evaluation of vegetation that would be used as an integral part of an evapotranspiration (ET) cover proposed for reclamation of tailings cells at the White Mesa Mill (Mill) site. A critical component of an ET cover is the plant community that will be established on the cover and will function over the long term to provide protection from wind and water erosion and assist in removing water through the process of transpiration. In this appendix, issues related to the short-term establishment and long-term sustainability of vegetation proposed as part of the ET cover are addressed. These issues include: plant species selection, ecological characteristics of species (i.e., longevity, sustainability, compatibility, competition, rooting depth and root distribution), characteristics of the established plant community (i.e., percent plant cover and leaf area index [LAI]), and soil requirements for sustained plant growth. Information is also presented on weed control, vegetation performance goals and criteria, and post-closure vegetation monitoring. In addition, biointrusion from both plants and animals is addressed using information from an on-site survey conducted in June 2012 and literature applicable to site conditions. Finally there is discussion on climate change projections for the performance period and possible changes that may occur with plant community composition over time.

D.2 PROPOSED SPECIES FOR ET COVER RECLAMATION

The following 15 species (11 grasses, 2 forbs, and 2 shrubs) are proposed for the ET cover system at the Mill site. These species were selected for their adaptability to site conditions, compatibility, and long-term sustainability. Species were also selected based on the assumption that institutional controls will exclude grazing by domestic livestock. The proposed species are:

- Western wheatgrass, variety Arriba (*Pascopyrum smithii*)
- Bluebunch wheatgrass, variety Goldar (*Pseudoroegneria spicata*)
- Slender wheatgrass, variety San Luis (*Elymus trachycaulus*)
- Streambank wheatgrass, variety Sodar (*Elymus lanceolatus* ssp. *psammophilus*)
- Pubescent wheatgrass, variety Luna (*Thinopyrum intermedium* ssp. *barbulatum*)
- Indian ricegrass, variety Paloma (*Achnatherum hymenoides*)
- Sandberg bluegrass, variety Canbar (*Poa secunda*)
- Sheep fescue, variety Covar (*Festuca ovina*)
- Squirreltail, variety Toe Jam Creek (*Elymus elymoides*)
- Blue grama, variety Hachita (*Bouteloua gracilis*)
- Galleta, variety Viva (*Hilaria jamesii*)
- Common yarrow, no variety (*Achillea millefolium*)
- White sage, variety Summit (*Artemisia ludoviciana*)
- Fourwing saltbush, variety Wytana (*Atriplex canescens*)
- Rubber rabbitbrush, no variety (*Ericameria nauseosus*).

These species are described in more detail later in this appendix.

D.3 PROPOSED SEEDING RATES

Given a mixture of the species listed above, Table D.1 presents broadcast seeding rates for each species. Seeding rates were developed based on the objective of establishing a permanent cover of grasses, forbs, and shrubs in a mixture that would promote compatibility among species and minimize competitive exclusion or loss of species over time. The proposed seeding rate is based on number of seeds/ft² and then converted to pounds of pure live seed per acre (lbs PLS/acre), with further discussion presented below.

The number of seeds placed in a unit area of soil is called the seeding rate. The total seeding rate is the sum of the individual species seeding rates. Seeding rates are normally expressed as the number of seeds per square foot or pounds per acre. Many different seeding rates for the same species can be found in the literature. The primary reason for these differences is that some rates are for monocultures and other rates are for diverse mixtures. In addition, seeding rates vary depending on the method of seeding and site conditions related to edaphic factors, topography and climate.

Seeding rates are developed on the basis of number of seeds per unit area (e.g. number of seeds per square foot). Once this number is determined, then it can be converted to weight per unit area (e.g. pounds per acre). Since each species produces seed that weighs a different amount, the development of seeding rates based purely on weight per unit area will produce erroneous rates that will tend to over emphasize small seeded species and under-emphasize large seeded species. For example, blue grama has approximately 700,000 seeds per pound, while Indian ricegrass has approximately 175,000 seeds per pound. If seeding rates were calculated simply on the basis of weight per unit area, without recognizing the fact that a pound of blue grama seed has four times the number of seeds per pound as Indian ricegrass, it would be very easy to over plant blue grama and under plant Indian ricegrass.

Table D.1. Species and Seeding Rates Proposed for ET Cover at the Mill Site

Scientific Name	Common Name	Varietal Name	Native/ Introduced	Seeding Rate (lbs PLS/acre) [†]	Seeding Rate (# seeds/ft ²)
Grasses					
<i>Pascopyrum smithii</i>	Western wheatgrass	Arriba	Native	3.0	7.9
<i>Pseudoroegneria spicata</i>	Bluebunch wheatgrass	Goldar	Native	3.0	9.6
<i>Elymus trachycaulus</i>	Slender wheatgrass	San Luis	Native	2.0	6.2
<i>Elymus lanceolatus</i>	Streambank wheatgrass	Sodar	Native	2.0	7.3
<i>Elymus elymoides</i>	Squirreltail	Toe Jam	Native	2.0	8.8
<i>Thinopyrum intermedium</i>	Pubescent wheatgrass	Luna	Introduced [‡]	1.0	1.8
<i>Achnatherum hymenoides</i>	Indian ricegrass	Paloma	Native	4.0	14.7
<i>Poa secunda</i>	Sandberg bluegrass	Canbar	Native	0.5	11.4
<i>Festuca ovina</i>	Sheep fescue	Covar	Introduced [‡]	1.0	11.5
<i>Bouteloua gracilis</i>	Blue grama	Hachita	Native	1.0	16.5
<i>Hilaria jamesii</i>	Galleta	Viva	Native	2.0	7.3
Forbs					

Scientific Name	Common Name	Varietal Name	Native/ Introduced	Seeding Rate (lbs PLS/acre) [†]	Seeding Rate (# seeds/ft ²)
<i>Achillea millefolium</i> , <i>variety occidentalis</i>	Common yarrow	VNS*	Native	0.5	32
<i>Artemisia ludoviciana</i>	White sage	VNS	Native	0.5	45
Shrubs					
<i>Atriplex canescens</i>	Fourwing saltbush	Wytana	Native	3.0	3.4
<i>Ericameria nauseosus</i>	Rubber rabbitbrush	VNS	Native	0.5	4.6
Total				26.5	188

[†]Seeding rate is for broadcast seed and presented as pounds of pure live seed per acre (lbs PLS/acre).

[‡]Introduced refers to species that have been 'introduced' from another geographic region, typically outside of North America. Also referred to as 'exotic' species. *VNS=Variety Not Specified but seed source would be designated from sites similar to the Mill site.

Seeding rate may be calculated from an expected field emergence for each species and the desired number of plants per unit area. For purposes of calculation, field emergence for small seeded grasses and forbs is assumed to be around 50 percent if germination is greater than 80 percent. Field emergence is assumed to be around 30 percent if germination is between 60 and 80 percent. The Natural Resource Conservation Service recommends a seeding rate of 20 to 30 pure live seeds per square foot as a minimum number of seeds when drill seeding single species in areas with an annual precipitation between 6 and 18 inches. Twenty pure live seeds per square foot, with an expected field emergence of 50 percent should produce an adequate number of plants on the seeded area to control erosion and suppress annual invasion. This seeding rate is primarily for favorable growing conditions, soils that are not extreme in texture, gentle slopes, north or east facing aspect, good moisture, adequate soil nutrients and single species vs. multiple species in a mixture. When conditions are less favorable when the seed is broadcast, or when multiple species are in a mixture the seeding rates are increased.

A Quality Assurance/Quality Control Plan for application rates and procedures for confirming that specified application rates are achieved is as follows. The first step begins with a seed order. Seed would be purchased as pounds of pure live seed. Each State has a seed certifying agency and certification programs may be adopted by seed growers. Certification of a container of seed assures the customer that the seed is correctly identified and genetically pure. The State agency responsible for seed certification sets minimum standards for mechanical purity and germination for each species of seed. When certified, a container of seed must be labeled as to origin, germination percentage, date of the germination test, percentage of pure seed (by weight), other crop and weed seeds, and inert material. The certification is the consumer's best guarantee that the seed being purchased meets minimum standards and the quality specified.

Once the seed is obtained, seed labels would be checked to determine the percent PLS and the date that the seed was tested for percent purity and percent germination. If the test date is greater than 6 months old, the seed would be tested again before being accepted. Seed will be applied using a broadcasting method. This procedure would use a centrifugal type broadcaster (or similar implement), also called an end-gate seeder. These broadcasters operate with an electric motor and are usually mounted on the back of a small tractor and generally have an effective spreading width of about 20 feet or more. Prior to seeding, a known area will be covered with a tarp and seed will be distributed using the broadcaster and simulating conditions that would exist under actual seeding conditions. Seed will then be collected and weighed to determine actual seeding rate in terms of pounds per acre. This process will be repeated until the specified seeding rate is

obtained. During the seeding process, the seeding rate will be verified at least once by comparing pounds of seed applied to the size of the area seeded. In addition, seed will be applied in two separate passes. One-half of the seed will be spread in one direction and the other half of seed will be spread in a perpendicular direction. This will ensure that seed distribution across the site is highly uniform and also provide the opportunity to adjust the seeding rate if the specified rate is not being achieved.

D.4 ECOLOGICAL CHARACTERISTICS OF PROPOSED SPECIES AND ESTABLISHED PLANT COMMUNITY

D.4.1 Ecological Characteristics of Plant Species of Tailings Cover System

Important ecological characteristics for each species proposed for reclamation are provided in the paragraphs that follow. Species information was obtained from a number of references that are cited below. The proposed species are adapted to the elevation (5,600 feet), precipitation (13 inches per year on average), and soil textural ranges (loam to sandy clay) that are well within the environmental conditions of the Mill site. Table D.2 presents a summary of the ecological characteristics discussed in the following paragraphs.

Western wheatgrass, variety Arriba (*Pascopyrum smithii*) – Western wheatgrass is a native, rhizomatous, long-lived perennial cool season grass. It grows well in a 10- to 14-inch mean annual precipitation zone and is adapted to a wide range of soil textural classes at elevation ranges up to 9,000 feet. Western wheatgrass has been an important species for restoring mining related disturbances, for erosion control and for critical area stabilization in semi-arid regions because of its ease of establishment and ability to grow successfully in pure or mixed stands of both warm and cool season species. Western wheatgrass is fire tolerant and regenerates readily following burning. The variety of Arriba is known for rapidly establishing seedlings and high seed production. The combination of its ability to spread vegetatively and reproduce by seed ensures long-term sustainability of this species.

Bluebunch wheatgrass, variety Goldar (*Pseudoroegneria spicata*) – Bluebunch wheatgrass is a native, cool season perennial bunch grass. Bluebunch wheatgrass grows on soils that vary in texture, depth and parent material. It is one of the most important and productive grasses found in sagebrush communities in the intermountain west. Bluebunch wheatgrass is fire tolerant and regenerates vegetatively following burning. This species is well adapted to a 12- to 14-inch mean annual precipitation range and is considered to be highly drought resistant. Bluebunch wheatgrass performs well in mixtures with other species and grows at elevations up to 10,000 feet.

Slender wheatgrass, variety San Luis (*Elymus trachycaulus*) – Slender wheatgrass is a native, cool season, perennial bunch grass that occasionally produces rhizomes. It is a short-lived species (5 to 10 years) but it reseeds and spreads well by natural seeding, exceeding most other wheatgrasses in this characteristic. Slender wheatgrass can serve as an important pioneer species; its seedlings are vigorous and capable of establishing on harsh sites. In addition, it is able to establish and compete with weedy species. Slender wheatgrass is commonly seeded in mixtures with other grasses and forbs to restore disturbances and rehabilitate native communities. It is adapted to a wide variety of sites and is moderately drought tolerant. It performs best at sites with an annual precipitation of 15 inches or more, but can grow on sites with precipitation levels as low as 13 inches.

Table D.2. Summary of Ecological Characteristics of Plant Species Proposed for the ET Cover at the Mill Site

Species	Origin	Annual or Perennial	Method of Spread	Ease of Establishment ^a	Compatibility with Other Species ^a	Longevity ^a	Annual Precipitation Range (inches)	Elevation Range (feet)	Soil Texture ^b	Rooting Depth (cm)	Soil Stabilization ^a	Drought Tolerance ^a	Fire Tolerance ^a
Western wheatgrass	Native	Perennial	Vegetative	4	3	4	10-14	≤9,000	S,C,L	109 ^d	4	4	4
Bluebunch wheatgrass	Native	Perennial	Seed	4	4	4	12-14	≤10,000	S,C,L	122 ^e	4	4	4
Slender wheatgrass	Native	Perennial	Seed	4	4	2	13-18	≤10,000	S,C,L	109 ^d	2	2	2
Streambank wheatgrass	Native	Perennial	Vegetative	4	4	4	11-18	≤10,000	S,C,L	165 ^f	4	4	3
Pubescent wheatgrass	Introduced	Perennial	Vegetative	4	2	4	12-18	≤10,000	S,C,L	185 ^d	4	4	3
Indian ricegrass	Native	Perennial	Seed	3	4	4	6-16	≤10,000	S,L	84 ^g	2	4	2
Sandberg bluegrass	Native	Perennial	Seed	4	4	4	12-18	≤12,000	S,C,L	45 ^h	2	3	4
Sheep fescue	Introduced	Perennial	Seed	4	2	4	10-14	≤11,000	S,C,L	56 ^e	3	4	2
Squirreltail	Native	Perennial	Seed	3	4	3	8-15	≤11,000	S,C,L	30 ^{c,i}	2	4	3
Blue grama	Native	Perennial	Vegetative	2	4	4	10-16	≤10,000	S,L	119 ^g	4	4	4
Galleta	Native	Perennial	Vegetative	3	4	4	6-18	≤8,000	S,C,L	30 ^j	4	4	4
Common yarrow	Native	Perennial	Vegetative	4	3	4	13-18	≤11,000	S,C,L	105 ^h	4	3	2
White sage	Native	Perennial	Vegetative	4	4	4	12-18	≥5,000	S,C,L	20 ^{c,i}	3	3	2
Fourwing saltbush	Native	Perennial	Seed	4	4	4	8-14	≤8,000	S,L	600 ^j	4	4	1
Rubber rabbitbrush	Native	Perennial	Seed	4	4	4	7-18	≤9,000	S,C,L	150 ^k	4	4	1

^aKey to Ratings—4 = Excellent, 3 = Good, 2 = Fair, 1 = Poor

^bSoil Texture Codes—S = Sand, C = Clay, L = Loam

^cDepth represents minimum depth; no information in the literature on average or maximum depth could be found.

^dWyatt et al., 1980.

^eWeaver and Clements, 1938.

^fCoupland and Johnson, 1965.

^gFoxx and Tierney, 1987.

^hSpence, 1937.

ⁱUSDA, 2012.

^jGibbens and Lenz 2001

^kMonsen et al., 2004.

Streambank wheatgrass, variety Sodar (*Elymus lanceolatus* ssp. *psammophilus*) – Streambank wheatgrass is considered to be part of the thickspike wheatgrass (*Elymus lanceolatus* ssp. *lanceolatus*) taxa. Variety Sodar is a native, perennial sod grass that is highly rhizomatous and adapted to the western intermountain area. It is highly drought tolerant and performs well in mean annual precipitation ranges between 11 and 18 inches. It grows on a wide range of soil textures, from sandy to clayey. Streambank wheatgrass is commonly used in mine land reclamation and is best known for its ability to control erosion and compete with annual weeds. Its highly rhizomatous nature ensures long-term sustainability of this species.

Pubescent wheatgrass, variety Luna (*Thinopyrum intermedium* ssp. *barbulatum*) – Pubescent wheatgrass is a long-lived sod forming perennial introduced from Eurasia. It is highly drought tolerant and grows where the mean annual precipitation is 12 inches or more. It is adapted to a wide range of soil textures, from sand to clay. Pubescent wheatgrass is a highly persistent species, should be seeded at low densities to avoid competition with native species.

Indian ricegrass, variety Paloma (*Achnatherum hymenoides*) – Indian ricegrass is a native, cool season, perennial bunchgrass with a highly fibrous root system. Indian ricegrass is one of the most common grasses on semi-arid lands in the west and is one of the most drought tolerant species used in mine land reclamation. It generally occurs on sandy soils, but is found on soils ranging from sandy to heavy clays. It grows from 2,000 to 10,000 feet in areas where the mean annual precipitation is 6 to 16 inches. Indian ricegrass is slow to establish, but highly persistent once it becomes established.

Sandberg bluegrass, variety Canbar (*Poa secunda*) – Sandberg bluegrass is a native, cool season perennial bunchgrass that is adapted to all soil textures and is highly resistant to fire damage. Sandberg bluegrass is one of the more common early-season bunchgrasses in the Intermountain area. It grows at elevations from 1,000 to 12,000 feet and can be successfully established in areas with a mean annual precipitation of 12 inches or more. Established plants are not overly competitive, and therefore highly compatible with other native species.

Sheep fescue, variety Covar (*Festuca ovina*) – Sheep fescue is a short, mat-forming introduced perennial that grows well on infertile soils in areas with a mean annual precipitation of 10 to 14 inches. It is long-lived and highly drought tolerant. Sheep fescue is a cool season species that greens up early in the spring. The proposed variety, Covar, was introduced from Turkey and is commonly used in mine land reclamation for long-term stabilization and erosion control. This variety was selected because plants are persistent, winter hardy, and drought tolerant.

Squirreltail, variety Toe Jam Creek (*Elymus elymoides*) – Squirreltail is a short-lived perennial that is selected for its ability to establish quickly and to effectively compete with undesirable annual grasses. It grows along an elevation range from 2,000 to 11,000 feet and on all soil textures in mean annual precipitation zones of 8 to 15 inches. Squirreltail is fairly tolerant of fire because of its small size.

Blue grama, variety Hachita (*Bouteloua gracilis*) – Blue grama is a low-growing perennial warm season bunchgrass. Blue grama produces an efficient, widely spreading root system that is mostly concentrated near the soil surface. Blue grama is adapted to a variety of soil types, but does best on well-drained soils and once established, is highly drought tolerant. This species is commonly found with cool-season species and is highly compatible with other native perennials.

Galleta, variety Viva (*Hilaria jamesii*) – Galleta is a strongly rhizomatous perennial warm season grass with a dense, fibrous root system. Galleta grows on sites receiving 6 to 18 inches of annual precipitation with soils ranging from coarse to fine. Plants have a low requirement for soil fertility and are drought and fire tolerant.

Common yarrow (*Achillea millefolium*, var. *occidentalis*) – Yarrow is a common native forb species that is rhizomatous and found growing from valley bottoms to timberline. It is commonly used in mine land reclamation, establishes easily from seed and is highly persistent. It grows on a variety of soil textures and found in a mean annual precipitation range between 13 and 18 inches. If seed is not available for *Achillea millefolium* var. *occidentalis*, then the introduced *Achillea millefolium* would be used, which has the same growth characteristics as the native form.

White sage, variety Summit (*Artemisia ludoviciana*) – White sage is considered to be a pioneer rhizomatous forb species that establishes quickly on disturbed sites and is highly compatible with perennial grasses. It does best on well-drained soils, but can be found growing on a wide range of soil textures. It is adapted to sites above 5,000 feet in elevation and to sites with a mean annual precipitation above 12 inches.

Fourwing saltbush, variety Wytana (*Atriplex canescens*) – Fourwing saltbush can be deciduous or evergreen, depending on climate. Its much-branched stems are stout and mature plants range from 1 to 8 feet in height, depending on ecotype, the soil, and climate. Fourwing saltbush is one of the most widely distributed and important native shrubs on rangelands in the western United States. Fourwing saltbush is highly palatable browse and is utilized primarily in the winter at which time it is high in carotene and digestible protein. Fourwing saltbush provides excellent season long browse for deer. It is a good browse plant for antelope and elk in fall and winter. It is also a food source and excellent cover for upland birds. Fourwing saltbush has excellent drought tolerance. Fourwing saltbush is adapted to most soils but is best suited to loamy to sandy to gravelly soils. It is not especially tolerant of fire, but may re-sprout to some degree if fire intensity is not too severe. Fourwing saltbush occurs most commonly in salt-desert scrub communities in the desert areas of western North America in areas that receive 8 to 14 inches of annual precipitation. It can be found from sea level in Texas to over 8,000 feet in Wyoming.

Rubber rabbitbrush (*Ericameria nauseosus*) – Rubber rabbitbrush is a native, perennial, warm-season shrub that grows to 1 to 8 feet tall. Rubber rabbitbrush is an important browse species for wildlife during the winter months. Rubber rabbitbrush occurs as a dominant to minor component in many plant communities, ranging from arid rangelands to montane openings. It thrives in poor conditions, and can tolerate coarse, alkaline soils. Dense stands are often found on degraded rangelands, along roadsides, and in abandoned agricultural fields. The species is useful in soil stabilization and restoration of disturbed sites. The root system establishes quickly and plants produce large quantities of leaf litter. Rubber rabbitbrush is adapted to cold, dry environments receiving 7 to 18 inches of annual precipitation at elevations ranging from 450 to 8,000 feet. Depending on the ecotype, rubber rabbitbrush can be found on loamy, sandy, gravelly or heavy clay soils that are slightly acidic, slight to strongly basic, or saline.

D.4.2 Longevity and Sustainability

All of the species proposed for reclamation of the tailings cells are long-lived, except for slender wheatgrass (*Elymus trachycaulus*) and squirreltail (*Elymus elymoides*). Slender wheatgrass is a perennial bunchgrass that is short-lived (5 to 10 years) but has the ability to reseed and spread vegetatively with rhizomes. Squirreltail is also a short-lived perennial but has the ability to establish quickly and is highly effective in competing with undesirable annual grasses. Both of these species are included in the proposed seed mixture because of their ability to provide quick cover for erosion protection and to effectively compete with annual and biennial species that cannot be relied upon to provide consistent and sustainable plant cover. The use of these species will facilitate the establishment of the remaining long-lived perennials that have been documented to be highly adapted to the elevation, climate, and soil conditions found at the Mill site (Monsen et al., 2004; Alderson and Sharp, 1994; Wasser, 1982; Thornburg, 1982).

The perennial grasses, forbs, and shrubs in the proposed seed mixture include species that develop individual plants that are long lived (30 years or more) and are able to reproduce either by seed or vegetative plant parts like rhizomes and tillers. The use of these species in reclamation of the tailings cells will ensure a permanent or sustainable plant cover because of the highly adapted nature of these species to site conditions, their tolerance to environmental stresses such as drought, fire, and herbivory, and their ability to effectively reproduce over time.

The use of a mixture of species for the ET cover also contributes to longevity and sustainability. The establishment of a diverse community has many advantages over a monoculture for sustained plant growth. The use of a variety of species ensures that diverse microsites that may exist over a seeded site are properly matched with species that are adapted to those specific environmental conditions. In addition, a mixture of species reverses the loss of plant diversity and enhances natural recovery processes following impacts from insects, disease organisms, and adverse or changes in climatic conditions. Finally, mixtures provide improved ground cover and surface stability, along with reducing weed invasion by fully utilizing plant resources such as water, nutrients, sunlight and space. Weeds in this context are typically annual or biennial plants considered to be undesirable, especially growing where they are not wanted.

D.4.3 Compatibility

Reclamation research and its application have been ongoing in the U.S. since the early 1900s. First with the reseeding of millions of acres following the dust bowl of the 1930s. Then, improvements of large tracts of arid and semi-arid rangelands between the 1960s and 1980s following more than a half a century of rangeland exploitation through overgrazing. In 1985 the U.S. Department of Agriculture Conservation Reserve Program was implemented which resulted in the conversion of more than 40 million acres of marginal farm land to permanent grasslands through an extensive seeding program. Finally, there have been tens of thousands of acres of mined lands reclaimed across the U.S. with the implementation of federal and state rules and regulations governing mine land reclamation. Over this time period, there have been thousands of reclamation publications in the form of books, scientific journal articles, symposium proceedings, and government publications. Many publications have reported on the performance of individual species and mixtures of species under semi-arid conditions similar to southeastern Utah (e.g., Plummer et al., 1968; Monsen et al., 2004). All of this work has led to a knowledge base about species compatibility. Species that are seeded together in mixtures must be compatible as young, developing plants or certain individuals will succeed and others will fail. The species proposed for the ET cover at the Mill site are all compatible with each other and seeding rates will be used to prevent overseeding species that may be aggressive [e.g., pubescent wheatgrass (*Thinopyrum intermedium*)] and could potentially dominate the site (Monsen et al.,

2004). These species are commonly seeded together and many studies have shown excellent interspecies compatibility (e.g., DePuit et al., 1978; DePuit, 1982; Redente et al., 1984; Sydnor and Redente, 2000; Newman and Redente, 2001). Finally, to increase compatibility and to reduce competition among seeded species, sites would be broadcast seeded as opposed to drill seeded. According to Monsen et al. (2004), drill seeding causes species in a mixture to be placed in potentially competitive situations, while broadcasted seeds are not placed in as close contact with each other as with drilling and therefore are less likely to be negatively impacted from competition.

D.4.4 Competition

There are two ways to view competition. In the context of establishing an ET cover on the tailings cells, the use of seeded species to compete with weeds is a desirable attribute. However, competition among seeded species with the potential loss of any of these species is undesirable. Therefore, as stated earlier, the proposed seed mixtures is comprised of species that can coexist and also fully utilize plant resources to minimize weed species establishment and excluding seeded species. The establishment of weeds, especially invasives (i.e., non-native species whose introduction causes economic and environmental harm) is unacceptable because of the potential loss of seeded perennial species and the subsequent reduction in species diversity, plant cover, and overall sustainability. Once established, the proposed seed mixture will produce a grass-forb-shrub community of highly adapted and productive species that will effectively compete with undesirable species.

D.4.5 Plant Cover

Monitoring of an alternative cover at the Monticello, Utah, Uranium Mill Tailings Disposal Site showed that the plant cover performed well over a seven year period. Plant cover ranged from 5.5 percent during the first growing season to nearly 46 percent in the seventh growing season (Waugh et al., 2008). Using results from the 2007 vegetation monitoring report (DOE, 2008) the following contributions to relative cover were reported showing that 6 of the 16 species seeded provided 70 percent or more of the cover when cover differences between reclamation zones is averaged: big sagebrush—5 percent to 10 percent; rubber rabbitbrush—5.3 percent to 17 percent; western wheatgrass—38.6 percent; cicer milkvetch—11 percent; thickspike wheatgrass—7.2 percent; and globemallow—0.1 to 0.2 percent.

Approximately 40 percent of the species proposed for the Mill site were seeded at Monticello and of the six best-performing species, three of these species are in the White Mesa mixture (i.e. *Pascopyrum smithii*, *Elymus lanceolatus*, and *Ericameria nauseosus*). Highly competitive species used at Monticello that are not proposed for White Mesa include three introduced species (i.e. smooth brome, crested wheatgrass, and alfalfa) that were not considered acceptable for the Mill site. Based on these results and the similarity in environmental conditions between Monticello and White Mesa, a plant cover estimate of 40 percent was determined to be a reasonable estimate for a long-term average, while a percent plant cover of 30 percent was assigned as a reduced performance scenario. The percent vegetative cover at White Mesa is expected to be slightly less than what would be found at Monticello because the average annual precipitation at White Mesa is approximately 13 inches compared to 15 inches at Monticello and the average annual maximum/minimum air temperatures are 64/37°F for White Mesa and 59/33°F for Monticello. The slightly greater precipitation and lower temperatures at Monticello are due to its slightly higher elevation of 7,000 feet compared to 5,600 feet at White Mesa.

A map of current vegetation at the Mill site does not exist. The most recent mapping of vegetation at the Mill site was conducted by Dames and Moore in 1977 (Dames and Moore 1978) as part of the Environmental Report for the White Mesa Uranium Project. In 1977, the major mapping units

for the project site were: big sagebrush (232 acres), controlled big sagebrush (567 acres), and reseeded grassland (369 acres). In June 2012 the area surrounding the Mill site was surveyed for plant community composition and cover in response to Interrogatory 11/1: Vegetation and Biointrusion Evaluation and Revegetation Plan of DRC (2012). There are two principal plant community types in the vicinity of the Mill site. These plant communities are Big Sagebrush shrubland and Juniper woodland. The Dames and Moore Environmental Report (1978) classified the Juniper woodland as a Pinyon-Juniper community type, but the primary tree species is Utah juniper (*Juniperus osteosperma*) and the presence of pinyon pine (*Pinus edulis*) is so infrequent that the community may be more appropriately classified as a Juniper woodland. In addition to these two principal plant community types, there are a number of disturbed areas that are in different stages of successional development and reflect past disturbances such as sagebrush removal (chaining and plowing) and seeding and intense grazing as evidenced by a complete lack of any understory species in some areas. The vegetation survey conducted in 2012 provides information of species that exist on the Mill site and their relative importance in terms of plant cover. All areas surveyed in 2012 show that big sagebrush (*Artemisia tridentata*) is the dominant species and subdominants are either broom snakeweed (*Gutierrezia sarothrae*) or galleta (*Hilaria jamesii*). If the area were re-mapped, most of the site would map as Big Sagebrush association. It appears that areas that were reseeded to crested wheatgrass and areas where controlled measures were applied to remove big sagebrush have returned to big sagebrush following seeding and/or control measures implemented sometime prior to 1978.

The Big Sagebrush shrubland is dominated by big sagebrush (*Artemisia tridentata*) with interspersed shrubs of broom snakeweed (*Gutierrezia sarothrae*) pale desert-thorn (*Lycium pallidum* var. *pallidum*), and rubber rabbitbrush (*Ericameria nauseosa*). The understory is mostly grasses with an infrequent occurrence of forbs. The grasses include galleta (*Hilaria jamesii*), squirreltail (*Elymus elymoides*), Indian ricegrass (*Achnatherum hymenoides*), and cheatgrass (*Bromus tectorum*). Forb species include scarlet globemallow (*Sphaeralcea coccinea*), lesser rushy milkvetch (*Astragalus convallarius*), and Russian thistle (*Salsola kali*).

The Juniper woodland occurs on shallow soils along the canyon rim to the east and west of the site. It is highly unlikely that this community type would expand its range into the deep, very fine sandy loam soil that occurs on the Mill site, which is the primary soil type supporting the Big Sagebrush shrubland. The vegetation sampling that was conducted in 2012 focused on the Big Sagebrush community and did not include the Juniper woodland because of the unlikely probability that this community type would ever establish on the Mill site or tailings cell cover system. A reconnaissance level survey was conducted in the Juniper community to observe both plant and animal species that occupy these areas.

D.4.6 2012 Plant Survey

The big sagebrush community type within the White Mesa Control Area to the north, south, and west of the restricted area of the mill and tailings facilities was surveyed using randomly placed transects and estimating cover by species using a point intercept sampling method (see Figure D.1). Along each 100 m long transect, live plant cover by species was determined by lowering a pin at 1 meter intervals and recording the plant species or ground cover (litter and bareground) that intersected the point. A total of 10 transects were sampled in each of the areas to the north, south and west of the mill and tailings cells. Table D.3 presents a summary of the vegetation survey conducted in the areas surrounding the mill and tailings cells. Tables D.4 through D.33 present plant cover data by transect for each of the three areas sampled in 2012.

Table D.3. Average Plant and Ground Cover from June 2012 Sampling in Areas Surrounding the Mill Site

Site and Plant Species	% Cover
North of Mill	
○ Big sagebrush (<i>Artemisia tridentata</i>)	19.1
○ Broom snakeweed (<i>Gutierrezia sarothrae</i>)	3.9
○ Rubber rabbitbrush (<i>Ericameria nauseosa</i>)	0.2
○ Palm desert-thorn (<i>Lycium pallidum</i> var. <i>pallidum</i>)	0.1
○ Galleta (<i>Hilaria jaamesii</i>)	3.6
○ Squirreltail (<i>Elymus elymoides</i>)	0.1
○ Indian ricegrass (<i>Achnatherum hymenoides</i>)	0.1
○ Cheatgrass (<i>Bromus tectorum</i>)	9.5
○ Scarlet globemallow (<i>Sphaeralcea coccinea</i>)	0.1
○ Lesser rushy milkvetch (<i>Astragalus convallarius</i>)	0.1
○ Russian thistle (<i>Salsola kali</i>)	0.6
Total Live Cover	37.4
Total Litter Cover	9.7
Total Bareground	53.1
South of Mill	
○ Big sagebrush (<i>Artemisia tridentata</i>)	18.3
○ Broom snakeweed (<i>Gutierrezia sarothrae</i>)	3.0
○ Galleta (<i>Hilaria jaamesii</i>)	8.5
○ Squirreltail (<i>Elymus elymoides</i>)	0.3
○ Indian ricegrass (<i>Achnatherum hymenoides</i>)	0.1
○ Cheatgrass (<i>Bromus tectorum</i>)	6.7
○ Scarlet globemallow (<i>Sphaeralcea coccinea</i>)	0.1
○ Russian thistle (<i>Salsola kali</i>)	1.4
Total Live Cover	38.4
Total Litter Cover	13.4
Total Bareground	48.2
West of Mill	
○ Big sagebrush (<i>Artemisia tridentata</i>)	20.5
○ Broom snakeweed (<i>Gutierrezia sarothrae</i>)	4.4
○ Pale desert-thorn (<i>Lycium pallidum</i> var. <i>pallidum</i>)	0.1
○ Galleta (<i>Hilaria jaamesii</i>)	6.6
○ Squirreltail (<i>Elymus elymoides</i>)	0.1
○ Indian ricegrass (<i>Achnatherum hymenoides</i>)	0.1
○ Cheatgrass (<i>Bromus tectorum</i>)	5.3
○ Scarlet globemallow (<i>Sphaeralcea coccinea</i>)	0.1
○ Russian thistle (<i>Salsola kali</i>)	0.8
Total Live Cover	37.9
Total Litter Cover	16.1
Total Bareground	46.0

Results from the 2012 sampling of the Big Sagebrush community surrounding the Mill site showed a mean live plant cover of 37.8 percent after averaging live plant cover estimated in areas north, south and west of the Mill site (Table D.3). This plant cover included an average of 23.1 percent

cover for shrubs, 13.7 percent cover for grasses, and 1.0 percent cover for forbs. In addition, the average percent litter was 13.1 percent and bareground averaged 49.1 percent. These cover estimates are somewhat greater than the cover values reported in Dames and Moore Environmental Report (1978). In the Environmental Report, the average live plant cover in the Big Sagebrush community was 33.3 percent. This cover included an average of 19.4 percent for shrubs and 13.8 percent for grasses. Litter was estimated at 16.9 percent and bareground was 49.9 percent. Annual precipitation in 1977 was 23.6 cm compared to a long-term average of 29.7 cm (Dames and Moore 1978). In addition, monthly precipitation during the period May-September 1978 totaled 3.8 cm compared to a long-term average of 12.5 cm for the same period. Considering the fact that the areas sampled are currently grazed, it is highly likely that a cover of 40 percent can be achieved and maintained on the tailings cell cover system for conditions that exclude grazing by livestock. The formation of desert pavement and potential impact on plant cover has been raised as an issue for discussion. Desert pavements are armored surfaces composed of angular or rounded rock fragments, usually 2 to 3 cm thick, set on or in a matrix of finer material (Cooke and Warren, 1973). These surfaces form on arid soils through deflation of fine material by wind or water erosion due to a lack of protection by surface vegetation (Cooke and Warren, 1973). Desert pavements are not common in semi-arid regions and do not occur where either wind or water erosion are controlled by plant cover (Hendricks, 1991), as would be the case for the White Mesa cover system. In addition, there is no evidence of desert pavement formation either on the Mill site or areas surrounding the site (which was confirmed during the 2012 plant survey). Even with the use of a topsoil layer amended with gravel, there is no supporting evidence to indicate a potential for desert pavement formation or an associated decrease in plant cover over the long term.

Table D.4. Plant cover data collected in 2012 north of the Mill site on Transect #1

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	20
Broom snakeweed (<i>Gutierrezia sarothrae</i>)	7
Galleta (<i>Hilaria jaamesii</i>)	6
Cheatgrass (<i>Bromus tectorum</i>)	13
Russian thistle (<i>Salsola kali</i>)	1
Litter	8
Bareground	45
Total Live Cover	47

Table D.5. Plant cover data collected in 2012 north of the Mill Site on Transect #2

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	28
Broom snakeweed (<i>Gutierrezia sarothrae</i>)	9
Rubber rabbitbrush (<i>Ericameria nauseosa</i>).	1
Galleta (<i>Hilaria jaamesii</i>)	2
Cheatgrass (<i>Bromus tectorum</i>)	8
Scarlet globemallow (<i>Sphaeralcea coccinea</i>)	1
Russian thistle (<i>Salsola kali</i>)	1
Litter	11
Bareground	39
Total Live Cover	50

Table D.6. Plant cover data collected in 2012 north of the Mill site on Transect #3

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	13
Rubber rabbitbrush (<i>Ericameria nauseosa</i>).	1
Galleta (<i>Hilaria jaamesii</i>)	6
Cheatgrass (<i>Bromus tectorum</i>)	9
Litter	7
Bareground	63
Total Live Cover	30

Table D.7. Plant cover data collected in 2012 north of the Mill site on Transect #4

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	27
Galleta (<i>Hilaria jaamesii</i>)	3
Cheatgrass (<i>Bromus tectorum</i>)	13
Russian thistle (<i>Salsola kali</i>)	2
Litter	8
Bareground	47
Total Live Cover	45

Table D.8. Plant cover data collected in 2012 north of the Mill site on Transect #5

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	31
Broom snakeweed (<i>Gutierrezia sarothrae</i>)	8
Indian ricegrass (<i>Achnatherum hymenoides</i>)	1
Lesser rushy milkvetch (<i>Astragalus convallarius</i>)	1
Russian thistle (<i>Salsola kali</i>)	1
Litter	9
Bareground	49
Total Live Cover	42

Table D.9. Plant cover data collected in 2012 north of the Mill site on Transect #6

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	6
Broom snakeweed (<i>Gutierrezia sarothrae</i>)	6
Squirreltail (<i>Elymus elymoides</i>)	1
Cheatgrass (<i>Bromus tectorum</i>)	9
Russian thistle (<i>Salsola kali</i>)	1
Litter	6
Bareground	71
Total Live Cover	23

Table D.10. Plant cover data collected in 2012 north of the Mill site on Transect #7

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	8
Broom snakeweed (<i>Gutierrezia sarothrae</i>)	6
Galleta (<i>Hilaria jaamesii</i>)	4
Cheatgrass (<i>Bromus tectorum</i>)	7
Litter	12
Bareground	63
Total Live Cover	25

Table D.11. Plant cover data collected in 2012 north of the Mill site on Transect #8

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	29
Galleta (<i>Hilaria jaamesii</i>)	11
Cheatgrass (<i>Bromus tectorum</i>)	14
Litter	14
Bareground	32
Total Live Cover	54

Table D.12. Plant cover data collected in 2012 north of the Mill site on Transect #9

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	4
Broom snakeweed (<i>Gutierrezia sarothrae</i>)	2
Indian ricegrass (<i>Achnatherum hymenoides</i>)	1
Galleta (<i>Hilaria jaamesii</i>)	4
Cheatgrass (<i>Bromus tectorum</i>)	6
Litter	9
Bareground	74
Total Live Cover	17

Table D.13. Plant cover data collected in 2012 north of the Mill site on Transect #10

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	24
Palm desert-thorn (<i>Lycium pallidum</i> var. <i>pallidum</i>)	1
Cheatgrass (<i>Bromus tectorum</i>)	16
Litter	13
Bareground	46
Total Live Cover	41

Table D.14. Plant cover data collected in 2012 south of the Mill site on Transect #1

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	12
Broom snakeweed (<i>Gutierrezia sarothrae</i>)	4
Galleta (<i>Hilaria jaamesii</i>)	7
Cheatgrass (<i>Bromus tectorum</i>)	12
Russian thistle (<i>Salsola kali</i>)	3
Litter	14
Bareground	48
Total Live Cover	38

Table D.15. Plant cover data collected in 2012 south of the Mill site on Transect #2

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	15
Broom snakeweed (<i>Gutierrezia sarothrae</i>)	
Galleta (<i>Hilaria jaamesii</i>)	17
Cheatgrass (<i>Bromus tectorum</i>)	7
Russian thistle (<i>Salsola kali</i>)	2
Litter	19
Bareground	40
Total Live Cover	41

Table D.16. Plant cover data collected in 2012 south of the Mill site on Transect #3

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	14
Rubber rabbitbrush (<i>Ericameria nauseosa</i>).	7
Galleta (<i>Hilaria jaamesii</i>)	8
Scarlet globemallow (<i>Sphaeralcea coccinea</i>)	1
Cheatgrass (<i>Bromus tectorum</i>)	6
Russian thistle (<i>Salsola kali</i>)	2
Litter	16
Bareground	46
Total Live Cover	38

Table D.17. Plant cover data collected in 2012 south of the Mill site on Transect #4

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	28
Galleta (<i>Hilaria jaamesii</i>)	4
Indian ricegrass (<i>Achnatherum hymenoides</i>)	1
Cheatgrass (<i>Bromus tectorum</i>)	1
Russian thistle (<i>Salsola kali</i>)	1
Litter	17
Bareground	48
Total Live Cover	35

Table D.18. Plant cover data collected in 2012 south of the Mill site on Transect #5

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	6
Galleta (<i>Hilaria jaamesii</i>)	6
Squirreltail (<i>Elymus elymoides</i>)	3
Cheatgrass (<i>Bromus tectorum</i>)	11
Litter	14
Bareground	60
Total Live Cover	26

Table D.19. Plant cover data collected in 2012 south of the Mill site on Transect #6

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	26
Broom snakeweed (<i>Gutierrezia sarothrae</i>)	8
Galleta (<i>Hilaria jaamesii</i>)	8
Cheatgrass (<i>Bromus tectorum</i>)	5
Litter	8
Bareground	45
Total Live Cover	47

Table D.20. Plant cover data collected in 2012 south of the Mill site on Transect #7

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	23
Cheatgrass (<i>Bromus tectorum</i>)	6
Russian thistle (<i>Salsola kali</i>)	3
Litter	12
Bareground	56
Total Live Cover	32

Table D.21. Plant cover data collected in 2012 south of the Mill site on Transect #8

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	13
Galleta (<i>Hilaria jaamesii</i>)	13
Cheatgrass (<i>Bromus tectorum</i>)	11
Russian thistle (<i>Salsola kali</i>)	3
Litter	16
Bareground	44
Total Live Cover	40

Table D.22. Plant cover data collected in 2012 south of the Mill site on Transect #9

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	18
Broom snakeweed (<i>Gutierrezia sarothrae</i>)	8
Galleta (<i>Hilaria jaamesii</i>)	9
Cheatgrass (<i>Bromus tectorum</i>)	2
Litter	14
Bareground	49
Total Live Cover	37

Table D.23. Plant cover data collected in 2012 south of the Mill site on Transect #10

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	29
Broom snakeweed (<i>Gutierrezia sarothrae</i>)	2
Galleta (<i>Hilaria jaamesii</i>)	13
Cheatgrass (<i>Bromus tectorum</i>)	6
Litter	4
Bareground	46
Total Live Cover	50

Table D.24. Plant cover data collected in 2012 west of the Mill site on Transect #1

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	26
Broom snakeweed (<i>Gutierrezia sarothrae</i>)	6
Galleta (<i>Hilaria jaamesii</i>)	4
Cheatgrass (<i>Bromus tectorum</i>)	7
Litter	13
Bareground	44
Total Live Cover	43

Table D.25. Plant cover data collected in 2012 west of the Mill site on Transect #2

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	26
Galleta (<i>Hilaria jaamesii</i>)	9
Cheatgrass (<i>Bromus tectorum</i>)	1
Litter	18
Bareground	46
Total Live Cover	36

Table D.26. Plant cover data collected in 2012 west of the Mill site on Transect #3

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	9
Cheatgrass (<i>Bromus tectorum</i>)	11
Litter	23
Bareground	57
Total Live Cover	20

Table D.27 Plant cover data collected in 2012 west of the Mill site on Transect #4

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	33
Broom snakeweed (<i>Gutierrezia sarothrae</i>)	13
Galleta (<i>Hilaria jaamesii</i>)	7
Scarlet globemallow (<i>Sphaeralcea coccinea</i>)	1
Cheatgrass (<i>Bromus tectorum</i>)	4
Russian thistle (<i>Salsola kali</i>)	4
Litter	9
Bareground	39
Total Live Cover	62

Table D.28. Plant cover data collected in 2012 west of the Mill site on Transect #5

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	29
Galleta (<i>Hilaria jaamesii</i>)	6
Squirreltail (<i>Elymus elymoides</i>)	1
Cheatgrass (<i>Bromus tectorum</i>)	5
Russian thistle (<i>Salsola kali</i>)	2
Litter	14
Bareground	43
Total Live Cover	43

Table D.29. Plant cover data collected in 2012 west of the Mill site on Transect #6

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	12
Broom snakeweed (<i>Gutierrezia sarothrae</i>)	9
Indian ricegrass (<i>Achnatherum hymenoides</i>)	1
Cheatgrass (<i>Bromus tectorum</i>)	7
Russian thistle (<i>Salsola kali</i>)	2
Litter	17
Bareground	52
Total Live Cover	31

Table D.30. Plant cover data collected in 2012 west of the Mill site on Transect #7

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	14
Broom snakeweed (<i>Gutierrezia sarothrae</i>)	4
Galleta (<i>Hilaria jaamesii</i>)	14
Palm desert-thorn (<i>Lycium pallidum</i> var. <i>pallidum</i>)	1
Cheatgrass (<i>Bromus tectorum</i>)	6
Litter	14
Bareground	37
Total Live Cover	39

Table D.31. Plant cover data collected in 2012 west of the Mill site on Transect #8

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	22
Broom snakeweed (<i>Gutierrezia sarothrae</i>)	7
Cheatgrass (<i>Bromus tectorum</i>)	6
Litter	20
Bareground	45
Total Live Cover	35

Table D.32. Plant cover data collected in 2012 west of the Mill site on Transect #9

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	14
Broom snakeweed (<i>Gutierrezia sarothrae</i>)	2
Galleta (<i>Hilaria jaamesii</i>)	11
Cheatgrass (<i>Bromus tectorum</i>)	3
Litter	19
Bareground	51
Total Live Cover	30

Table D.33. Plant cover data collected in 2012 west of the Mill site on Transect #10

Species and Other Cover Categories	Percent Cover
Big sagebrush (<i>Artemisia tridentata</i>)	19
Broom snakeweed (<i>Gutierrezia sarothrae</i>)	3
Galleta (<i>Hilaria jaamesii</i>)	15
Cheatgrass (<i>Bromus tectorum</i>)	3
Litter	14
Bareground	46
Total Live Cover	40

D.4.7 Leaf Area Index

Monthly leaf area index (LAI) values were estimated for the proposed ET cover at the Mill site. Three primary publications were used to estimate monthly LAI for the ET cover, including: Groeneveld (1997), Scurlock et al. (2001), and Fang et al. (2008). Table D.34 presents a compilation of LAI values based on North American data sets that were focused on semi-arid herbaceous plant communities. Scurlock et al. (2001) presented mean LAI values for 15 biomes/land cover classes that included desert, grassland, and shrubland. Leaf Area Index data was a compilation of data from the literature and represented various data collection methods. Mean LAI values reported were 1.3 (S.D. 0.85) for desert, 2.6 (S.D. 3.0) for grassland, and 2.1 (S.D. 1.6) for shrubland. Fang et al. (2008) presented LAI data for various biomes using MODIS (Moderate Resolution Imaging Spectroradiometer). These authors reported monthly LAIs for grasslands and shrublands with peak values for shrubland reported at 1.5 and 1.0 for grasslands. Finally, Groeneveld (1997) conducted field measurements of LAI in Owens Valley, CA in 1983. He reported LAI values for individual grass and shrub species and reported the following values in November for big sagebrush and in July for the remaining species: big sagebrush LAI's ranged from 0.65 to 1.8; fourwing saltbush (*Atriplex canescens*) LAI's ranged from 1.2 to 4.7; shadscale saltbush (*Atriplex confertifolia*) LAI's ranged from 1.6 to 2.6; greasewood (*Sarcobatus vermiculatus*) LAI's ranged from 1.0 to 3.3; alkali sacaton (*Sporobolus airoides*) LAI's ranged from 0.38 to 4.0; and saltgrass (*Distichlis spicata*) LAI's ranged from 0.67 to 3.9. All of the data presented in these three papers was used to estimate an average monthly LAI for the revegetated cover system assuming a well-established plant community. A maximum LAI of 2.6 was selected for peak biomass in the month of September which matches the mean grassland LAI reported by Scurlock et al. (2001) and well below values reported by Groeneveld (1997). Leaf Area Index values for the remaining months was then extrapolated from the peak month using monthly values presented by Fang et al. (2008). It is important to note that the proposed species for the ET cover include both cool- and warm-season species. This combination of species will maximize the length of the growing season and transpiration from early spring to late fall. Cool-season species are more productive and use more water during the cooler times of the growing season, while warm-season species are more productive and use more water during the warmest period of the year.

Table D.34. Leaf Area Index for the ET Cover at Mill Site

Month											
Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
0	0	0.3	0.7	0.6	0.6	1.8	2.4	2.6	0.8	0.1	0

D.4.8 Project Root Biomass for Infiltration Modeling

We have chosen to use root biomass data from a seeded site in Cheyenne, Wyoming that was seeded in the 1950s with root biomass data collected about 35 years after seeding (Redente et al. 1989). Data were collected as g/m² and will not be converted (Table D.35). Infiltration model uses a normalized root density function, so root measurement units are irrelevant. The climatic conditions between Blanding, Utah and Cheyenne, Wyoming are similar with Blanding receiving 34 cm of precipitation and Cheyenne receiving 36 cm. Potential evapotranspiration (PET) at Blanding is 122 cm and 115 cm in Cheyenne. Finally, the precipitation to PET ratio is 0.28 for Blanding and 0.31 for Cheyenne. Table D.35 presents both anticipated root biomass and reduced biomass that is calculated based on a 75 percent reduction in biomass that has been reported in long-term drought studies (Weaver and Albertson 1936).

Table D.35. Projected root biomass data for anticipated and reduced performance for use in infiltration modelling

Depth (cm)	Root Biomass (g/m ²) Anticipated Performance	Root Biomass (g/m ²) Reduced Performance [†]
0-5	160	64
5-10	140	49
10-20	76	23
20-60	125	32
60-100 [‡]	52	2

[†]Based on an increasing percent reduction from 60% to 80% with depth, as extended drought or reduced precipitation with potential climate change would result in less deep infiltration and therefore greater negative effect on deeper roots compared to shallower roots. [‡]Maximum rooting depth under the reduced performance scenario would be 68 cm.

D.5 BIOINTRUSION

D.5.1 Plant Intrusion

Table D.36 presents percent of root mass by depth for grass and shrub species that exist or may occur on the Mill site during the performance period. It is extremely important to recognize that the rooting depths for the shrubs do not reflect the rooting depths that are expected in the cover system but represent rooting depths reported in the literature with an effort to identify the maximum rooting depths reported. Detailed rooting depth studies are rare and the majority of studies do not report root mass by depth. The shrub values reported in Table D.36 represent extrapolations from the literature using the maximum rooting depths reported and following the general findings in the literature that the majority of root growth typically is in the upper 30 cm for grasses and the upper 60 cm for shrubs growing in semiarid regions. The final note of importance that relates to the cover system is that root growth is strongly influenced by the soil which the root is growing and therefore root data from the literature must be carefully scrutinized as it is applied to specific site conditions (Munshower 1995). The shrub root data shown in Table D.36 should therefore not be interpreted to represent the expected rooting depths in the cover system since

rooting depth will be controlled by the highly compacted radon attenuation layer within the cover system.

Soil texture appears to be the most important soil property determining the growth-limiting bulk density of a soil because of the effect of texture on soil pore size and mechanical resistance. A soil with a large amount of fine particles (silt and clay) will have smaller pore diameters and a higher penetration resistance at a lower bulk density than a soil with a large amount of coarse particles (sand size). Zisa et al. (1980) reported a silt loam soil had 19 percent macropore space and a measured penetration resistance of 2.5 bars at a bulk density of 1.4 g/cm³. A coarser sandy loam soil had 28.9 percent macropore space and a penetration resistance of 1.2 bars at the same bulk density.

Roots grow in soil through large soil pores and by moving soil particles aside when the roots penetrate pores that are smaller than the root tips. When a soil is compacted to a growth-limiting level, most soil pore diameters are substantially smaller than the diameters of growing roots. In this situation, root growth is essentially halted because the roots cannot exert enough pressure to overcome the mechanical resistance and move soil particles. Other pertinent studies that relate root growth and bulk density include articles by Siegel Issem et al. 2005, Mimore and Woollard 1969, and Heilman 1981.

Most, if not all, of the root growth studies cited above that relate root growth to soil compaction and soil bulk density are field studies in native soils that have been in place for centuries or longer. These soils have therefore gone through countless wetting and drying cycles and freeze-thaw cycles and still maintain certain bulk densities that impede root growth.

Table D.36. Percent of root mass by depth for grasses and shrub species that exist or may occur at the Mill site during the performance period of 200 years.

Species	0-30 cm	30-60 cm	60-90 cm	90-120 cm	120-150 cm
Western wheatgrass ^a	65	14	12	9	0
Blue grama ^a	94	4	1	1	0

Species	0-20 cm	20-40 cm	40-60 cm	60-80 cm	80-100 cm	100-200 cm	200-300 cm	300-400 cm	400-500 cm	500-600 cm
Big sagebrush ^a	35	19	17	10	7	8	4	-- ^f	--	--
Fourwing saltbush ^b	18	22	15	14	10	8	6	4	2	1
Shadscale ^c	15	20	18	14	12	8	6	4	2	1
Blackbrush ^d	35	50	15	--	--	--	--	--	--	--
Mormon tea ^e	20	35	17	13	10	4	1	--	--	--

^aTabler 1964; ^bGibbens and Lenz 2001; ^cKearney et al 1960; ^dWest 1983; Manning et al. 1990;

^eGibbens and Lenz 2001; ^fbeyond maximum rooting depth reported in the literature

It is important to note that shrub rooting depths reported in the literature do not reflect expected rooting depths in the cover system because of the presence of a highly compacted radon attenuation layer.

D.5.2 Animal Intrusion

The Dames and Moore Environmental Report (1978) included animal surveys for sites surrounding the Mill site. The Environmental Report recorded the presence or possible presence of a number of burrowing species in the Big Sagebrush community, including burrowing owl (*Bubo virginianus*), pocket mouse (*Perognathus* sp.), kangaroo mouse (*Microdipodops* sp.), vole (*Microtus* sp.), desert cottontail (*Sylvilagus audubonii*), coyote (*Canis latrans*), red fox (*Vulpes vulpes*), striped skunk (*Mephitis mephitis*), badger (*Taxidea taxus*), longtail weasel (*Mustela frenata*), and Gunnison prairie dog (*Cynomys gunnisoni*). Additional burrowing animals reported to occur in the Juniper community included pinyon mouse (*Peromyscus truei*) and deer mouse (*Peromyscus maniculatus*). The northern pocket gopher (*Thomomys talpoides*) was not observed in either community type and no mention of the species is made in the 1978 report.

D.5.3 2012 Burrowing Animal Survey

In June 2012 the area surrounding the Mill site was surveyed for burrowing animals in response to Interrogatory 11/1. A total of 100 km of transects were walked in Big Sagebrush and Juniper communities surrounding the Mill Site to determine either the presence of burrowing animals or future colonization based on existing habitat characteristics (see Figure D.2).

Transects were arranged in a systematic manner (at each location in Figure D.2) with a 50 m spacing between transects and transect lengths running between 100 and 400 m, depending upon physiographic features on the landscape. The primary focus of the survey was on three species that would potentially represent the deepest potential for burrows on the tailings cells during the performance period. These species included the badger, Gunnison prairie dog, and northern pocket gopher. Observations were made along each transect for animal sightings, animal presence in the form of tracks, scat or active burrows, burrow densities, and habitat characteristics.

During the animal survey one badger sighting was made and multiple active prairie dog colonies were observed to the north of the mill complex. There appears to be suitable habitat for the northern pocket gopher in the sagebrush communities surrounding the Mill site, but there is no indication that a population of northern pocket gophers occurs in the vicinity of the Mill site. There were no evidence of pocket gophers during surveys associated with the Environmental Report (Dames and Moore, 1978) and no evidence of pocket gophers 34 years later.

An attempt was made to estimate burrow densities for badgers but it was not always possible to confirm a badger burrow. No badger feeding areas (i.e. dug-out prey burrows) were observed along transects that were traversed. The reported burrow density for badgers may or may not be low, depending upon how active badgers are in the area. One of the seminal studies on badger ecology was conducted by Messick and Hornocker (1981) in southwestern Idaho. The authors reported badger densities of 159/50 km². This converts to approximately three per 100 hectares. Our survey reported the highest burrow densities at one per 80 to 100 hectares. If each burrow represented more than one individual badger, the densities potentially would be greater. Regardless, the reported burrow densities from the 2012 survey are believed to be a realistic estimate of badger presence at the Mill site.

Within the prairie dog colonies that were located in the area of the Mill site, the greatest burrow density was estimated at 148 burrows per hectare. Over the entire Mill site the prairie dog burrow density ranges from 0 to 148 burrows per hectare. Lupis et al. (2007) reported densities of active burrows in southeastern Utah in the range of 41 to 131/hectare or an average of 75 active burrows

per hectare. The burrow densities reported from our 2012 survey are well within the range of a much larger study conducted by Lupis et al. (2007).

Lupis et al. (2007) provide a list of species in grasslands and shrublands in Utah considered primary and secondary habitat for the Gunnison's prairie dog as follows:

"Perennial and annual Grasslands; or herbaceous dry meadows, including mostly forbs and grasses occurring at 640-2,740 m (2,200-9,000 ft) elevation. Principal perennial grass species include: bluebunch wheatgrass, sandburg bluegrass (*Poa secunda*), crested wheatgrass (*Agropyron cristatum*), basin wildrye (*Elymus cinereus*), galleta (*Pleuraphis jamesii*), needlegrass (*Achnatherum hymenoides*), sand dropseed (*Sporobolus cryptandrus*), blue grama (*Bouteloua gracilis*), Thurbers needlegrass (*Achnatherum thurberianum*), western wheatgrass (*Pascopyum smithii*), squirreltail (*Sitanion hystrix*), timothy (*Phleum* spp.), poa (*Poa* spp.), spike (*Trisetum spicatum*), Indian ricegrass (*Oryzopsis hymenoides*), and some sedges (*Cyperaceae* spp.). Principle annual grass species is cheatgrass (*Bromus tectorum*). Principal forb species include: yarrow (*Achillea millefolium*), dandelion (*Taraxacum officinale*), Richardson's geranium (*Geranium richardsonii*), penstemon (*Penstemon* spp.), mulesears (*Wyethia amplexicaulis*), golden aster (*Chrysopsis villosa*), arrowleaf balsamroot (*Balsamorhiza sagittata*), hawkbit (*Agoseris pumila*), larkspur (*Delphinium* spp.), and scarlet gilia (*Gilia pulchella*). Primary associated shrub species include: sagebrush (*Artemisia* spp.), shadscale (*Atriplex confertifolia*), greasewood (*Sarcobatus* spp.), creosote (*Larrea tridentata*), rabbit brush (*Crysothamnus* spp.), cinquefoil (*Potentilla simplex*), snowberry (*Symphoricarpos albus*), and elderberry (*Sambucus* spp.). Primary associated tree species is juniper (*Juniperus* spp.)."

"Shrublands at 670-3,150 m (2,200-10,300 ft) elevation principally dominated by greasewood (*Sarcobatus vermiculatus*), shadscale, graymolly (*Kochia vestita*), mat-atriplex (*Atriplex corrugata*), Castle Valley clover (*Atriplex cuneata*), winterfat, budsage (*Artemisia spinescens*), four-wing saltbush (*Atriplex canescens*), halogeton (*Halogeton glomeratus*), Mormon tea (*Ephedra* spp.), horsebrush (*Tetradymia canescens*), snakeweed and rabbitbrush; or low elevation perennial grassland co-dominate with shrubland. Principal grassland species include: galleta, Indian ricegrass, three-awn grass (*Aristida glauca*) and sand dropseed. Primary associated forb species include: desert trumpet (*Eriogonum inflatum*). Primary associated shrub species include: sagebrush, and black brush (*Coleogyne ramosissima*); other associated species include seepweed (*Suaeda torreyana*)."

Based on the report by Lupis et al. (2007) we agree that the habitat that will be created at the Mill site following revegetation will include species consistent with prairie dog occupation.

Table D.37 presents an updated assessment of maximum burrow depths for animal species that may occur on the Mill site. Based on a review of literature for burrow depths, the species that have the potential for the deepest burrows are badger (228 cm), northern pocket gopher (150 cm), and Gunnison prairie dog (427 cm). As discussed above, both the badger and Gunnison prairie dog were observed during the 2012 animal survey, while there is no evidence that the northern pocket gopher occurs in the vicinity of the Mill site from both the 1978 and 2012 surveys.

The proposed cover system is a monolithic evapotranspiration (ET) cover that consists of the following layers from top to bottom: 15 cm of a topsoil-gravel erosion protection layer over 107

cm of a water storage, biointrusion and radon attenuation layer over 75 cm of a highly compacted radon attenuation layer over 75 cm of a grading and radon attenuation layer. The proposed cover system does not contain a biobarrier (e.g. cobble layer) to minimize potential intrusion by burrowing animals. The proposed cover system is designed to minimize burrowing animal intrusion through the use of thick layers of soil cover in combination with a highly compacted layer placed at a depth that is below the expected burrowing depths among species that may inhabit the site. The thickness of the cover (total of 272 cm), the use of a highly compacted radon attenuation layer located at a depth between 122 and 197 cm, and a final 75 cm layer below the compacted zone will all contribute to minimizing any biointrusion through the cover. Considering the animal species that may inhabit the tailings cells and the thickness and physical nature of the cover, it is not anticipated that burrowing will extend below 122 cm or into the very top portion of the highly compacted zone. Burrowing into the highly compacted radon attenuation layer that begins at a depth of 122 cm will be restricted because of the high density of this material (95 percent Standard Proctor).

Table D.37. Range of maximum burrow depths for wildlife that inhabit or may inhabit the Mill site during the required performance period of at least 200 years

Species	Maximum Depth (cm)	Source
Pocket mouse	52 to 62 35-153	Kenagy 1973; Scheriber 1978
Pinyon mouse	34	Reynolds and Wakkinen 1987
Deer mouse	13-50	Reynolds and Laundre 1988; Kritzman 1974
Kangaroo rat	24-61 20-69	Reynolds and Wakkinen 1987; Anderson and Allred 1964
Vole	15-55	Reynolds and Wakkinen 1987
Desert cottontail	Abandoned burrows and surface nest	Wilson and Reeder 2005; Chapman and Willner 1978
Long-tailed weasel	Abandoned burrows and surface nest	Feldhammer et al. 2003
Striped Skunk	90	Jackson 1961
Badger	150 to 228	Lindsey 1976; Anderson and Johns 1977
Gunnison prairie dog	30 to 427 69 to 185 68 to 82	Verdolin et al. 2008; Sheets et al 1971; Whitehead 1927
Red fox	100 to 130	Feldhammer et al. 2003; Saunders 1988
Coyote	Most common behavior is to use burrows of other animals like the badger	http://carnivora.com/topic/932884/1/
Burrowing owl	Abandoned burrows	Haug et al. 1993
Northern Pocket Gopher	10 to 30 150	Winsor and Whicker 1980; Gettinger 1975; Felthausen and McInroy 1983

D.6 SOIL REQUIREMENTS FOR SUSTAINABLE PLANT GROWTH

There are two key components to establishing an ET cover with a sustainable plant community. The first is to select long-lived species that are adapted to the environmental conditions of the site. The second is to provide a cover soil that will function as an effective plant growth medium over the long term by supplying plants with adequate amounts of water, nutrients and rooting volume.

There are a number of soil characteristics that are particularly important to achieve long-term sustainability in semi-arid environments and include the following: pH, electrical conductivity (EC), sodium levels, percent organic matter, texture, bulk density, cation exchange capacity, macronutrient concentrations, available water holding capacity, and soil microorganisms. Table D.38 presents levels for most of these soil properties that are considered necessary for long-term sustained plant growth. In addition, the table includes soil property levels from soil samples of potential cover soil collected from stock piles at the Mill site in May 2009.

The soil properties of the potential cover soil that are acceptable for sustaining long-term plant growth include: pH, EC, sodium adsorption ratio (SAR), percent clay content, and extractable phosphorus. Those soil properties that appear to be deficient and would need improvement include: percent organic matter, total nitrogen, and extractable potassium.

Cation exchange capacity was not measured in the potential cover soil, but it is believed that the cover soil will have an acceptable level for sustained plant growth based on the percent clay content and a recommendation that an organic matter amendment be added to the soil during the reclamation process. Bulk density of the emplaced cover material will be specified in the cover design and will be controlled during the construction process to be within the sustainability range shown in Table D.38.

Table D-38. Soil Properties and Their Range of Values Important for Sustainable Plant Growth, Along with Analytical Results of Soil Available for ET Cover Construction at the Mill Site

Soil Property	Level for Sustainability	Reference	Levels for On-Site Soil
pH (units)	6.6 to 8.4	Munshower (1994)	7.7 to 8.1
EC (mmhos/cm)	≤4.0	Munshower (1994)	<1.5
Sodium adsorption ratio	≤12	Munshower (1994)	<0.5
Organic matter (%)	1.0 to 3.0	Smith et al. (1987)	0 to 0.4
Texture (%)	> 50% silt and clay	Brady (1974)	> 50% silt and clay
Bulk density (g/cm ³)	1.2 to 1.8	Brady (1974)	1.59 to 1.99 [†]
Water holding capacity (cm H ₂ O/cm soil)	0.08 to 0.16	Brady (1974)	0.084-0.14 [†]
Cation exchange capacity (meq/100g)	5 to 30	Munshower (1994)	Not measured
Total nitrogen (%)	0.05 to 0.5	Harding (1954)	0.02 to 0.05
Extractable phosphorus (mg/kg)	6 to 11	Ludwick and Rogers (1976)	10 to 57
Extractable potassium (mg/kg)	60 to 120	Ludwick and Rogers (1976)	11 to 36

[†]Calculated values

In order for the potential cover soil to function as a normal soil and provide long-term sustainable support for the vegetation component of the ET cover, it will be amended to improve organic matter content, nitrogen and potassium levels. An organic matter amendment will also improve available water holding capacity and cation exchange capacity. The proposed organic amendment is composted biosolids. Composted biosolids have been successfully used in mined land reclamation over the past 40 years. This amendment would also provide a source of soil microorganisms that will function to cycle nutrients over time and ensure sustainable plant growth. Composted biosolids would be applied at a rate of 10 tons/acre and incorporated into the upper six inches of the water storage layer of the cover system. Composted biosolids are also a source

of nitrogen, phosphorous and potassium and will serve to improve organic matter content and soil fertility. The following discussion provides the rationale for selecting composted biosolids as the amendment of choice for the cover soil.

Type of Amendment, Application Rates, and Costs – There are three possible soil amendments that would be a source of organic matter and nutrients for sustained plant growth. These amendments include composted biosolids, a combination of manure and hay, or a commercial organic fertilizer such as Biosol®. Biosol® is a highly effective organic amendment but would be cost prohibitive if the objective is to achieve 1 percent organic matter content in the soil. It would require the addition of at least 10 tons/acre to meet this organic matter target and the cost would be approximately \$12,300/acre, which includes a product cost of \$12,000/acre, transportation cost of \$100/acre, and an application cost of \$200/acre. Composted biosolids would be equally effective as Biosol®, but much less expensive. Composting of biosolids is a proven method for pathogen reduction and results in a product that is easy to handle, store, and use. The end product is usually a Class A, humus-like material without detectable levels of pathogens that can be applied as a soil amendment. Composted biosolids provide large quantities of organic matter and nutrients (such as nitrogen and phosphorus) to the soil, improves soil texture, and elevates soil exchange capacity. If composted biosolids were obtained from Farmington, NM (which appears at this time to be the closest source), the cost for a 10 ton/acre application rate would be \$1,530/acre, which includes \$260/acre for product cost, \$1,070/acre for transportation, and \$200/acre for application. The use of manure and hay would be the least effective amendment because both products have the potential of adding unwanted weed seed to the cover vegetation and manure is relatively high in nitrogen and if not properly off set with hay, there is a potential of having excessive nitrogen introduced into the cover system that would also lead to a proliferation of unwanted weeds.

Method of Application – Composted biosolids are produced by mixing biosolids (treated sewage sludge) and wood waste material. Composted biosolids are easy to apply and would be broadcast over the soil surface using a commercial manure spreader and the amendment would then be incorporated with a chisel plow or disc plow.

Limitations of Soil Amendments – Composted biosolids have few limitations as a soil amendment. Composted biosolids are often low in readily available nitrogen, but have high organic nitrogen levels that can be slowly released for plant use over time. The EPA has established rules for the land application of biosolids that address concerns about possible pathogen transmittal, nitrate pollution, and trace metal contamination (EPA, 1993 and 1995). In order to be land applied, a particular biosolid must have undergone a pathogen reduction process, must contain less than a specified amount of bacterial pathogens, and must meet limits for heavy metal concentration.

Considerable research has been conducted over the past 40 years on the interactions between biosolids, soil properties, plant growth and environmental quality. Amendment of disturbed soils with composted biosolids has been shown to increase soil organic matter, cation exchange capacity, soil nutrient levels, microbial biomass and activity, water holding capacity, and aggregate stability, and also to reduce soil bulk density and metal availability for plant uptake. The potential for successful reclamation with composted biosolids is tremendous and most of the highly beneficial properties of composted biosolids as a soil amendment come from its high organic matter content (Sopper, 1993). The use of composted biosolids is extremely important where topsoil is inadequate in amount or quality (Sopper, 1993; Munshower, 1994).

The application of composted biosolids on disturbed land generally has had a very beneficial effect on the establishment and growth of grasses and forbs (Sopper, 1993; Haering et al., 2000). It facilitates rapid establishment and vigorous growth of herbaceous plants. Sites treated with composted biosolids generally have a greater percent cover, greater aboveground production, and better developed root systems compared to non-amended sites or sites treated with just inorganic fertilizers (Sopper, 1993; Haering et al., 2000). The use of composted biosolids also aids in the establishment and growth of shrubs. Annual height and diameter growth is improved with composted biosolids and overall woody plant survival is increased if competition from herbaceous plants is not an issue (Sopper, 1993; Haering et al., 2000).

Field studies at the Climax Molybdenum Mine near Leadville, Colorado conducted by Carlson et al. (2006) examined the effect of composted biosolids on tailings reclamation over a seven-year period. The findings of this study were that composted biosolids are an effective means of establishing soil microbe and vegetation communities on tailings. The authors concluded that: over seven years and in extreme growing conditions, biosolid amendments reduced soil toxicity [by immobilizing heavy metals], neutralized acidity, and introduced constituents [e.g. nutrients and soil microbes] necessary to sustain vegetation communities on tailings capped with overburden material.

In a very long-term study conducted by Paschke et al. (2005) the effect of biosolids amendments were assessed on disturbances in a sagebrush community in northwestern Colorado. The authors reported that 24 years after biosolids were applied on fertile and infertile soil material that: "... biosolids amendments have long-lasting effects on soil fertility and plant community composition..."

The greatest limitation for the use of composted biosolids at the Mill site will be availability of the product. Availability varies over time depending upon supply and demand. Since the Mill site is in a remote location, sources of composted biosolids in the quantities needed for tailing cell reclamation are limited and advanced planning will be required to secure the quantities needed when the cover system is being constructed.

D.7 WEED MANAGEMENT

Weed management would be conducted on the Mill site by identifying the presence of any noxious weeds during annual vegetation surveys and developing a weed control plan that is specific to the species that are present (Table D.39). Noxious weed control is species dependent and both method and timing will vary from species to species.

Each survey will identify noxious weed populations and locate these populations on a map using a set of symbols to identify species, size of the infestation, and density of the population. The effectiveness of control methods will also be documented in each annual survey. In addition, immediately adjacent off-site properties will be visually surveyed to a distance of 100 feet. Inspections will be conducted by personnel familiar with the identification of noxious weeds in the area and based on Utah's Noxious Weed List.

The selected control methods will be based on the type, size, and location of the mapped noxious weeds. The treated area(s) will be monitored and re-inspected annually for new weed introductions and to evaluate the success of the control methods. Prevention is the highest priority weed management practice on non-infested lands; therefore protecting weed-free plant communities is the most economical and efficient land management practice. Prevention is best accomplished by ensuring that new weed species seed or vegetative reproductive plant parts of

weeds are not introduced into new areas, and by early detection of any new weed species before they begin to spread.

Control methods may include chemical or mechanical approaches. The optimum method or methods for weed management will vary depending on a number of site-specific variables such as associated vegetation, weed type, stage of growth, and severity of the weed infestation.

Table D.39. Noxious Weed Species

Scientific Name	Common Name
Utah State—Listed Noxious Weeds	
<i>Acroptilon repens</i>	Russian knapweed
<i>Cardaria spp.</i>	Whitetop (all species)
<i>Carduus nutans</i>	Musk thistle
<i>Centaurea diffusa</i>	Diffuse knapweed
<i>Centaurea solstitialis</i>	Yellow star thistle
<i>Centaurea stoebe ssp. micranthos</i>	Spotted knapweed
<i>Centaurea virgate ssp. Squarrosa</i>	Squarrose knapweed
<i>Cirsium arvense</i>	Canada thistle
<i>Convolvulus spp.</i>	Bindweed (all species)
<i>Cynodon dactylon</i>	Bermuda grass
<i>Elymus repens</i>	Quackgrass
<i>Euphorbia esula</i>	Leafy spurge
<i>Isatis tinctoria</i>	Dyer's woad
<i>Lepidium latifolium</i>	Broadleaf pepperweed
<i>Lythrum salicaria</i>	Purple loosestrife
<i>Onopordum acanthium</i>	Scotch thistle
<i>Sorghum alnum</i>	Perennial sorghum (all species)
<i>Taeniatherum caput-medusae</i>	Medusahead
San Juan County—Listed Noxious Weeds	
<i>Aegilops cylindrical</i>	Jointed goatgrass
<i>Alhagi maurorum</i>	Camelthorn
<i>Asclepias subverticillata</i>	Western whorled milkweed
<i>Solanum elaeagnifolium</i>	Silverleaf nightshade
<i>Solanum rostratum</i>	Buffalobur

Chemical Control

Chemical control consists mostly of selective and non-selective herbicides. Considerations for chemical controls include: herbicide selection, timing of application, target weed, desirable plant species being grown or that will be planted, number of applications per year and number of years a particular species will need to be treated for desired control. Also important are the health and safety factors involved, and the need to consider undesirable impacts. The use of herbicides will be in compliance with all Federal and State laws on proper use, storage, and disposal. The chemical application will be done by a licensed contractor in accordance with all applicable laws and regulations and all label instructions will be strictly followed. Applications of herbicides would

not be permitted when the instructions on the herbicide label indicate conditions that are not optimal.

Mechanical Control

Mechanical control is the physical removal of weeds from the soil and includes tilling, mowing, and pulling undesirable plant species. Tillage is most effective prior to seeding and establishment of desirable vegetation. The tillage method of weed control can be effective in eliminating noxious perennial weeds when repeated at short intervals (every 1-2 weeks) throughout the growing season. Tillage has the drawback of indiscriminately impacting all vegetation interspersed with weeds in established areas and can eliminate competitive, desirable vegetation leaving behind a prime seedbed for weeds to reinvade. Mowing can be an effective method for controlling the spread of an infestation and preventing the formation and dispersal of seeds. Mowing is most effective on weeds which spread solely or primarily by seed. In order to achieve this, it must be repeated at least twice during the growing season prior to, or shortly after bloom. Also, even the most intense mowing treatment will not kill hardy perennial weeds. Additional considerations will be made when selecting control treatments when specific situations arise regarding type, size, and location of weed infestations. Examples of this are perennial versus biennial, broadleaf versus grasses, noxious weeds interspersed with desirable vegetation, large monoculture patches, or small patches requiring spot treatment.

Treatment windows schedules, based on the control methods chosen and the noxious weeds present, will be established for each treatment area. The best time to treat perennial noxious weeds is in the spring or fall during their active growth phase. Different species will have different optimum treatment times even with the same type of control. Perennial weeds usually grow vegetatively in the spring, flower and seed in late spring and early summer, enter dormancy during the summer and actively grow again in the fall. The treatment windows selected will depend on the species present and control methods selected.

The final preparatory step is to determine the priority for areas to be treated. Prioritization ensures that the most important areas are dealt with at the most effective times. Important areas of concern include areas that may transport weed seeds. These areas include ditches, roadsides, and land equipment storage sites. Large monoculture patches are of concern wherever they occur and would always be high priority. Also, small patches of weeds would be treated to prevent expansion of weed populations.

Once the treatment plan is implemented, detailed records will be kept, and success or failure of treatment will be recorded so as to eliminate unsuccessful treatments.

D.8 REVEGETATION ACCEPTANCE GOALS/CRITERIA AND MONITORING

The following Revegetation Acceptance Goals/Criteria have been adapted from the Monticello Site and would be used at the Mill site to determine reclamation success.

Criterion 1 Species Composition

- a. The vegetative cover (the percentage of ground surface covered by live plants) shall be composed of a minimum of five perennial grass species (at least four listed as native), one perennial forb and two shrub species listed in Table D.1.

Criterion 2 Vegetative Cover

- a. Attain a minimum vegetative cover percentages of 40 percent.
- b. Individual grass and forb species listed in Table D.1 that are used to achieve the cover criteria shall have a minimum relative cover (the cover of a plant species expressed as a percentage of total vegetative cover) of 4 percent and a maximum relative cover of 40 percent.
- c. Individual species not listed in Table D.1 may be accepted as part of the cover criteria if it is demonstrated that the species is native or adapted to the area and is a desirable component of the reclaimed project site.
- d. Species not listed in Table D.1, including annual weeds or other undesirable species shall not count toward the minimum vegetative cover requirement. Every attempt should be made to minimize establishment of all non-noxious weeds.
- e. Reclaimed areas shall be free of state- and county-listed noxious weeds (Table D.40).
- f. The vegetative cover shall be self-regenerating and permanent. Self-regeneration shall be demonstrated by evidence of reproduction, such as tillers and seed production.

Criterion 3 Shrub Density

- a. A minimum shrub density of 500 stems per acre
- b. Shrubs shall be healthy and have survived at least two complete growing seasons before being evaluated against success criteria

Monitoring

Plant cover would be measured annually on the tailing cells for a minimum of ten years or until the revegetation goals stated above are achieved. Cover would be measured by the point method, using a vegetation sighting scope mounted on an adjustable tripod with a level (or similar instrument). Cover would be measured for each species encountered, as well as litter, rock, and bareground. Cover measurements would be made along a minimum of ten randomly placed transects on each tailing cell that are 100 feet long. A total of 100 points would be sited at one-foot intervals along each transect to collect cover data in the categories of live vegetation, litter, rock, and bareground. Sample adequacy would be determined for each tailing cell using the following formula that identifies the minimum number of samples that are necessary to estimate the population mean at a 90 percent level of confidence. Total live vegetation cover would be used to calculate sample adequacy.

$$n = \frac{t^2 s^2}{(.10x)^2}$$

Where: n = minimum number of samples required to meet sample

adequacy requirements

s^2 = variance

t^2 = 1.64 for 90% confidence

\bar{x} = sample mean

Shrub density would be measured in belt transects placed on either side of the cover transects. All shrubs would be counted within a three-foot wide strip or belt transect along each side of the transect used for point cover measurements, resulting in a belt transect that is six-feet wide and 100 feet long.

In addition to the above cover sampling, annual observations would be made of overall plant community health and sustainability. Overall health would be based on plant vigor, presence of annual weeds, and signs of plant deficiencies or toxicities. Plant community sustainability would be based on observations of reproduction, including both vegetative reproduction, such as tillering, and seed production.

If revegetated areas are not making satisfactory progress in meeting revegetation goals outlined above, then remedial actions will be implemented as needed. These actions may include fertilization/soil amendments, reseeding, weed control, and/or erosion control depending upon the cause of the problem that may exist and the best remediation approach to ensure plant community success. Potential revegetation problems that are most likely to occur based on typical revegetation projects in the semiarid west and on experiences at the Monticello Site fall into two categories. The first is poor initial plant establishment following revegetation practices and the second is poor plant growth during post-revegetation management. Poor initial plant establishment can be caused by a number of factors including unfavorable soil conditions related to texture or soil chemistry, improper seedbed preparation, improper seeding techniques, improper species selection, poor seed quality, planting in the wrong season, seed predation, and inadequate precipitation. If revegetation at the Mill site results in unacceptable initial plant establishment, the cause of this response will be investigated, the identified cause will be corrected, and the necessary revegetation practices will be applied until successful plant establishment has occurred. The most likely cause of poor initial plant establishment at the Mill site would be low precipitation and additional seedings would be required in a subsequent year(s) until precipitation improves and an adequate stand of vegetation is achieved. Additional mulching to control erosion and improve soil moisture conditions for seed germination and initial seedling growth would be part of the remedial process. Poor plant growth during post-revegetation management has been an issue at the Monticello Site as it relates to shrub establishment. The primary species that has been an issue is big sagebrush and the cause of the problem has been seedling damage associated with vole herbivory.

D.9 SUSTAINABILITY OF THE COVER DESIGN

D.9.1 CLIMATE CHANGE

Climate, more than any other factor, controls the broadscale distributions of plant species and vegetation. At finer scales, other factors such as local environmental conditions including soil nutrient status, pH, water-holding capacity and the physical elements of aspect or slope influence the potential presence or absence of a species. However, intra- and inter-specific interactions, such as competition for resources (light, water, nutrients), ultimately determine whether an individual plant is actually found at any particular location (Sykes 2009). Rapid climate change

associated with increasing greenhouse gas emissions (IPCC 2007) influences current and future vegetation patterns. Other human-influenced factors are, however, also involved. Sala et al. (1997) identified five different drivers of change that can be expected to affect global biodiversity over the next 100 years. Globally, land use change was considered the most important driver of change, followed by climate change, airborne nitrogen deposition, biotic interactions (invasive species) and direct CO₂ fertilizing or water use efficiency effects.

Predicted changes in climate that may occur in the southwestern U.S. include increased atmospheric concentrations of CO₂, increased surface temperatures, changes in the amount, seasonality, and distribution of precipitation, more frequent climatic extremes, and a greater variability in climate patterns. Recent temperature increases have made the current drought in the region more severe than the natural droughts of the last several centuries. This drought has caused substantial die-off of pinyon pine trees in approximately 4,600 square miles of pinyon-juniper woodland in the Four Corners region (Breshears et al. 2005). Williams et al. (2010) examined correlations between climate and the radial growth of trees across North America. They show that conifer trees in the southwest are particularly sensitive to temperature and aridity relative to other regions. They used climate-tree growth relations calculated for the past 100 years, combined with Intergovernmental Panel on Climate Change (IPCC) climate model estimates for the 21st century to predict the likely fate of important southwest tree species such as pinyon pine. They concluded that woodlands and forests will experience substantially reduced growth rates and increase mortality at many southwest sites as the century progresses.

The specific physiological effects of increasing GHG emissions (particularly CO₂) on vegetation include increased net photosynthesis, reduced photorespiration, changes in dark respiration, and reduced stomatal conductance which decreases transpiration and increases water use efficiency (Patterson and Flint 1990). Ambient temperature affects plants directly and indirectly at each stage of their life cycle (Morison and Lawlor 1999). Water (i.e. soil moisture) is usually the abiotic factor most limiting to vegetation, especially in arid and semi-arid regions. Carbon dioxide, temperature, and soil moisture effects on plant physiology are exhibited at the whole-plant level in terms of growth and resource acquisition. In addition to the individual effects of increasing temperatures, CO₂ is the additional interactive effect on photosynthetic productivity and ecosystem-level process (Long and Hutchin 1991).

Plants are finely tuned to the seasonality of their environment, and shifts in the timing of plant activity (i.e. phenology) provide some of the most compelling evidence that species and ecosystems are being influenced by global environmental change (Cleland et al. 2007). Changes in the phenology of plants have been noted in recent decades in regions around the world (Bradley et al. 1999; Fitter and Fitter 2002; Walther et al. 2002; Parmesan and Yohe 2003). Phenology of plant species is important both at the individual and population levels. Specific timing is crucial to optimal seed set for individuals and populations; and variation among species in their phenology is an important mechanism for maintaining species coexistence in diverse plant communities by reducing competition for pollinators and other resources. Global climate change could significantly alter plant phenology because temperature influences the timing of development, both alone and through interactions with other cues, such as photoperiod.

Shifts in the relative competitive ability of plants that experience changes in CO₂, surface temperatures, or soil moisture may result in changes to their spatial distribution (Long and Hutchin 1991; Neilson and Marks 1994). Increases in temperature may enhance the competitive ability of C₄ plants (such as grasses) relative to C₃ plants (shrubs and trees) (Owensby et al. 1999), especially where soil moisture (Neilson 1993) or temperature (Esser 1992) is limiting.

There are numerous uncertainties and complexities associated with the use of all regional climate models with regard to their ability to reliably forecast longer-term future climate conditions in the North American South West (NASW) and at the Mill site. Therefore, attempts to extend the results from climate model predictions forecasting climate conditions through the end of the 21st century to timeframes of 200 to 1,000 years will likely result in further compounding of these uncertainties and result in unreliable predictions. We identified this concern in earlier discussions presented on the topic of climate change.

We have reviewed references cited in the Division's Rd 1 Interrogatories for White Mesa Revised ICTM Report on estimating the range of future climates (CNRWA 2005; NRC 2003; NRC 1997). The Center for Nuclear Waste Regulatory Analyses (CNRWA 2005) conducted an analysis of factors contributing to uncertainty in estimating future climates at Yucca Mountain. Their report concludes the following:

"In summary, research performed within the last five years suggests that the timing of climate changes over the next 100,000 years may be difficult to infer from the patterns of climate change over the last 500,000 years due to the unusually low eccentricity of Earth's orbit and, possibly, the influence of anthropogenic greenhouse gases. After 100,000 years, the Earth's orbital climate forcing will be stronger, and the influence of greenhouse gases may have diminished so that the Pleistocene climate history may offer a better analog in terms of timing of climate changes. In terms of the characteristics of future climates (i.e., mean annual precipitation and temperature, seasonal weather patterns, and storm intensities), the characteristics inferred from paleoclimate reconstructions and present day analog records may represent the range of climate conditions that will occur in the future, even if the timing of these climates cannot be reliably estimated. The greatest uncertainty in future climate conditions relates to anthropogenic effects that may result in climates in southern Nevada that do not have analogs with present or Pleistocene climates, such as prolonged El Niño conditions. The nature, likelihood, and duration of such nonrepresentative climate conditions cannot be reliably assessed based on current research. Over longer time periods, the range of conditions inferred from the Pleistocene paleoclimate record reasonably bounds future climate during the period of geologic stability."

We agree with NRC's preferred approach of using paleoclimate data to estimate the likely range of future conditions. In fact, in our previous discussion of climate change in Attachment G (EFRI, 2012), we discussed the paleoclimate approach presented by Waugh and Petersen (1994) for the Monticello site.

Waugh and Petersen (1994) summarize future climate change as follows:

"Global mean temperature may increase by 1.8 to 5.2°C in the next century, in response to an industrial age buildup of carbon dioxide (CO₂), methane, and other gases (Houghton et al. 1992). Model projections of the magnitude of warming vary, depending on whether factors such as CO₂ fertilization, feedback from stratospheric ozone depletion, and the radiative effects of sulfate aerosols are taken into account. Model projections of precipitation responses to greenhouse warming also are inconsistent (Houghton et al. 1990; Crowley and North 1991; Washington and Meehl 1984; Wilson and Mitchell 1987; Schlesinger and Mitchell 1987). Some regions may be effectively wetter and others drier, depending on the balance of the greater potential evaporation and the greater water-holding capacity of a warmer atmosphere. Greenhouse warming may eventually be overwhelmed as the earth plunges into another ice age. Models of cyclic astronomical

forcing of climate agree that, without anthropogenic disturbances, a long-term cooling trend that started about 6,000 years ago will continue, climaxing with a major glaciation in about 60,000 years (Imbrie and Imbrie 1980; Berger et al. 1991). In contrast, aperiodicity in the timing of past ice ages is evident in oxygen isotope records (Winograd et al. 1992). Other paleorecords suggest that certain feedback mechanisms have caused rapid and unpredictable transitions into ice ages (Berger and Labeyrie 1987; Phillips et al. 1990)."

Waugh and Petersen (1994) concluded from their investigation that despite uncertainty about drivers of future climate change, climate extremes in the next 1,000 years likely will not exceed those associated with the last glacial and interglacial periods. Therefore, paleo-records of full glacial and Altithermal climates in the Four Corners region provide reasonable ranges of possible future climate and should be incorporated in assessments of the long-term performance of tailings disposal facilities. For Monticello, Utah, full glacial and Altithermal climate reconstructions provide working levels of 2 to 10° C mean annual temperature and 38 to 80 cm mean annual precipitation. If we assume that a similar range of temperature and precipitation could also occur at the Mill site, then during the next glacial phase anticipated to occur approximately 60,000 years into the future the climate would be a colder and wetter compared to current conditions, and if conditions post-glaciation result in a warm period the climate would be warmer and wetter than current conditions.

Table D.41 presents a list of possible climate scenarios for the Mill site, their likelihood of occurrence and the resulting plant community type that would develop during the required performance period. From the review of climate change literature applicable to the southwest U.S. and an analysis of the impact of various climate change scenarios, it is our conclusion that the most likely plant community type that will be maintained throughout the 200- to 1,000-year performance period is a community dominated initially by cool season grasses, with a long-term transition to dominance by warm season grasses and shrubs as atmospheric CO₂ and temperature continues to increase and precipitation either increases or decreases.

D.7.2 Plant Community Succession and Potential for Species Colonization

Plant succession is the ecological process of directional vegetation change over time, usually beginning with relatively-short lived herbaceous plants and culminating in plant communities dominated by long-lived, generally woody species. Succession occurs on all sites. The rate of succession can be relatively rapid, especially in regions of higher rainfall, or it can be very slow, as in some desert and arctic regions, but this process of vegetation change is constantly taking place.

Two common aspects of succession are 1) an increase in vegetation structure and 2) an increase in the relative amounts of woody plants. Both of these aspects have profound implications to the function of cover systems. Vegetation structure refers to the shape of the vegetation, e.g., height, coverage, and stratification. Structure increases as succession proceeds, both above- and belowground. Aboveground, the height of the vegetation increases (e.g., grasses may be replaced by shrubs), coverage of the soil surface increases, and layering (strata) of vegetation occurs, with different species occupying different vertical layers. Similar processes occur belowground. Root systems become deeper as shallow-rooted species are replaced by deeper-rooted species, root biomass increases in lower soil depths as the number and types of species increase, and the density of the root system increases in the various layers.

Table D.40. Possible Climate Scenarios for the Mill Site, Likelihood of Occurrence and Projected Change in Plant Species Composition Compared to the Initial Grass/forb Community Established on the Soil Cover

Possible Climate Scenarios	Likelihood of Occurrence ⁹	Projected Plant Community Type in 1,000 Years with Seeded Grass/Forb as the Initial Community
Warmer and Drier than Present ¹	Highly Likely	Grass/forb community with an increase in warm season species.
Warmer and Wetter than Present ²	Highly Likely	Will depend on distribution of additional precipitation. If more precipitation in winter months, then the plant community would experience an increase in woody plants; if more precipitation in the summer months, then the plant community would continue as a grass/forb type.
Warmer than Present with Similar Total Precipitation ³	Unlikely	Grass/forb community with an increase in warm season species.
Cooler and Wetter than Present ⁴	Highly Unlikely	Shift to more woody plants because of more snow in winter months.
Cooler and Drier than Present ⁵	Highly Unlikely	Shift to more woody plants because of more snow in winter months.
Cooler than Present with Similar Precipitation ⁶	Highly Unlikely	Shift to more woody plants because of more snow in winter months.
Drier than Present with Similar Temperature ⁷	Unlikely	Grass/forb community with an increase in warm season species because of less overall moisture and increase in atmospheric CO ₂ .
Wetter than Present with Similar Temperature ⁸	Unlikely	Shift to more woody plants because of more winter precipitation.

¹Results in less total precipitation but shift to less snow and more rain in winter months.

²Results in more total precipitation with shift to less snow and more rain in winter months or more rain in summer months.

³Results in no change in total precipitation but shift to less snow and more rain in winter months.

⁴Results in more total precipitation with shift to more snow in winter months.

⁵Results in less total precipitation but shift to more snow in winter months.

⁶Results in no change in total precipitation but shift to more snow in winter months.

⁷Results in less total precipitation.

⁸Results in more total precipitation.

⁹Likelihood of occurrence based on majority of climate model estimates analyzed by Cayan et al. 2010 and Seager and Vecchi 2010, with a focus on the southwest U.S.

As the vegetation shifts from dominance by herbaceous plants (e.g., grasses), which have relatively shallow root systems but with very dense root mass in the upper profile, to dominance by woody species (e.g., shrubs), which have deeper roots systems with proportionately more roots in deeper layers, the hydrological dynamics of the system change. Early successional plant communities tend to extract most of the water they transpire from the upper soil profile. Late successional communities have greater ability to extract water from depth. This can be both a positive and a negative in the functional efficiency of covers. Because of successional changes in the vegetation, the plant-soil-water characteristics of a cover are likely to become very different over time. Conditions 200 years or more after construction are not likely to be similar to those soon after construction was completed. In some ways, conditions will be more favorable, e.g.,

evapotranspiration will likely be higher thus reducing the amount of deep infiltration and stability of the vegetation may be greater. In other ways, conditions will be less favorable, e.g., deeper root systems increase the concern for biointrusion. Because succession is a process that is near-universal ecologically, these changes have been accounted for in the cover design.

As stated earlier, the proposed cover system is a monolithic ET cover that consists of the following layers from top to bottom: 15 cm of a topsoil-gravel erosion protection layer over 107 cm of a water storage, biointrusion and radon attenuation layer over up to 110 to 136 cm of a highly compacted radon attenuation layer over 76 cm of a grading and radon attenuation layer. The proposed cover system does not contain a biobarrier (e.g. cobble layer) to minimize potential intrusion by plant roots during the required performance period. The proposed cover system is designed to minimize plant root intrusion through the use of thick layers of soil cover in combination with a highly compacted layer placed deep within the cover. The climax community for the Mill site is believed to be Big Sagebrush based on the current community type at the site and the relatively deep fine loamy soils that are present. If climate trends towards a warmer and dryer climate for the White Mesa area over the next 200 to 1,000 years, it is unlikely that sagebrush will remain on site and a community dominated by warm season species and more arid shrub species (e.g. shadscale saltbush, blackbrush and Mormon tea) may occur.

As discussed above, the process of succession and the effect of climate change will bring about changes in species composition in the tailings cover system. Our best forecast for the percentage of potential species colonization would be for a small percent of non-seeded species establishing during the first 50 years. The seeded community will be highly sustainable and big sagebrush would be the primary invader into the cover system. It is estimated that the established community will consist of 60 to 70 percent seeded species and 30 to 40 percent non-seeded species at end of the first 100 years. These non-seeded species will include big sagebrush and broom snakeweed, and a few grass and forb species common in the area. During the next 100 years the plant community will begin to transition to warm season species and big sagebrush will begin to diminish. By the end of the second 100 years it is estimated that the plant community will consist of 30 to 40 percent seeded and 60 to 70 percent non-seeded species and many of the non-seeded species will be warm season grasses and more arid shrub species. This trend will most likely continue through the remainder of the performance period with only 10 to 20 percent of the original seeded species still present and these would include blue grama and galleta. The remainder of the community would consist of more warm season grasses and shrubs that will have migrated north and higher in elevation with the warming climate.

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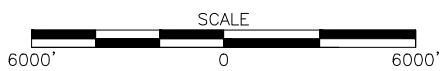
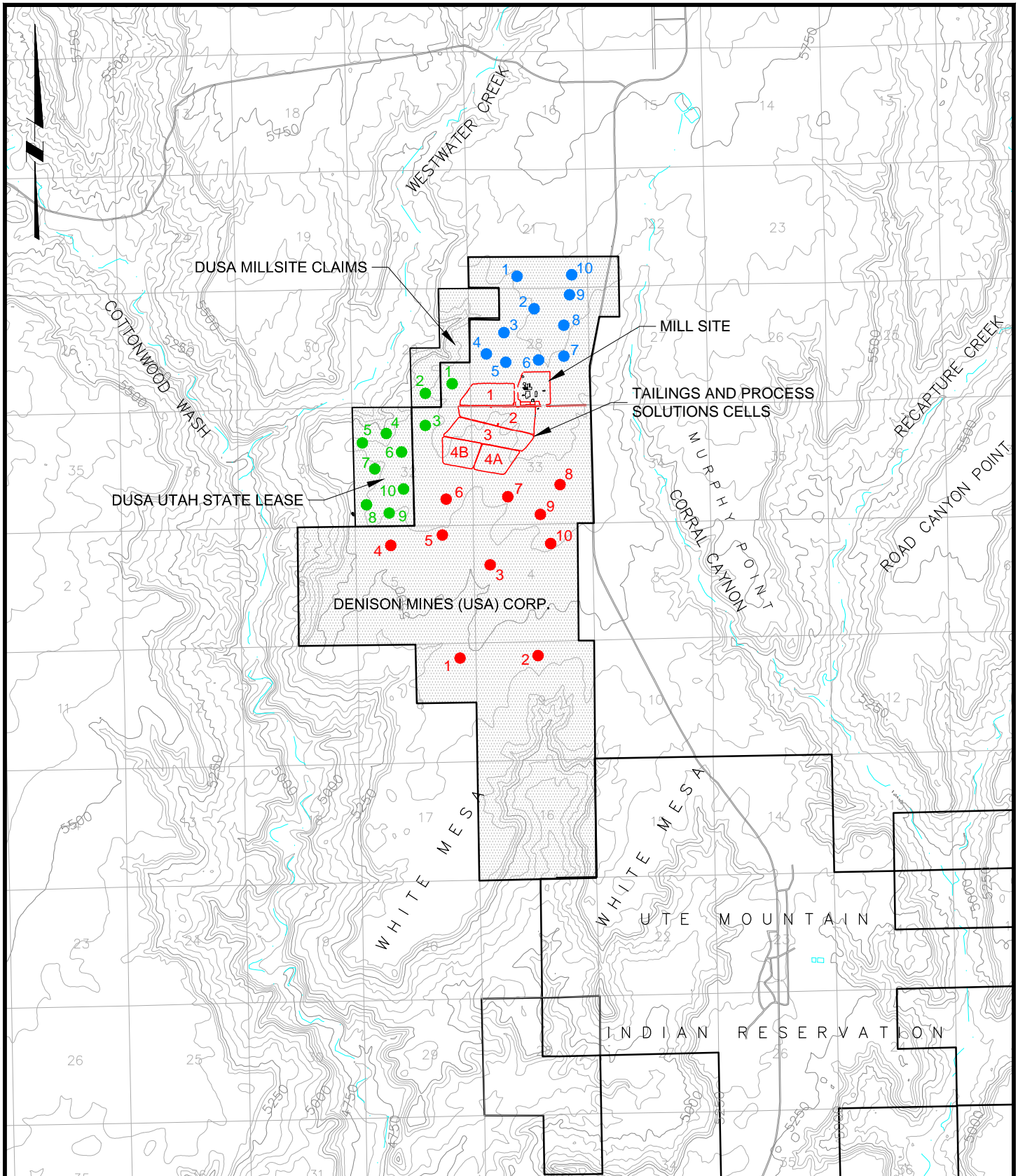
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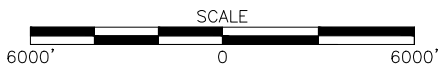
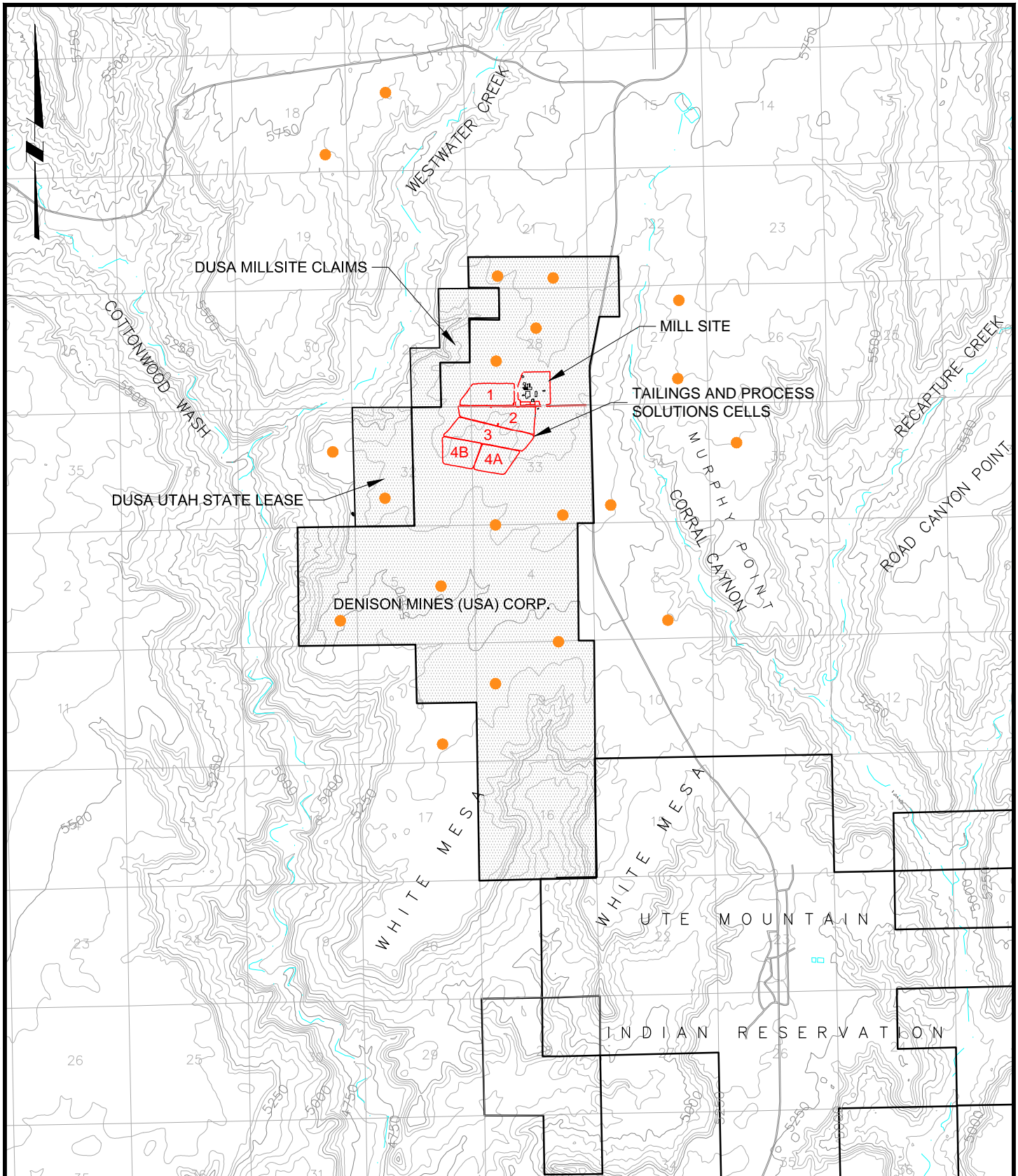


LEGEND

- TRANSECT LOCATION TO NORTH OF MILL COMPLEX
- TRANSECT LOCATION TO SOUTH OF MILL COMPLEX
- TRANSECT LOCATION TO WEST OF MILL COMPLEX



	PROJECT WHITE MESA MILL RECLAMATION	
	TITLE LOCATION OF 2012 PLANT COVER SURVEY TRANSECTS	
	DATE AUG 2015	FIGURE D.1
	FILE NAME 1009740 TRANS	

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LEGEND

- TRANSECT LOCATION FOR ANIMAL SURVEY

	PROJECT WHITE MESA MILL RECLAMATION	
	TITLE LOCATION OF 2012 ANIMAL COVER SURVEY TRANSECTS	
	DATE AUG 2015	FIGURE D.2
	FILE NAME 1009740 TRANS	

ATTACHMENT G.2

**REVISED APPENDIX J, REVEGETATION PLAN, TO THE UPDATED TAILINGS
COVER DESIGN REPORT (APPENDIX D OF THE RECLAMATION PLAN, REVISION
5.0)**

APPENDIX J

REVEGETATION PLAN

J.1 INTRODUCTION

Revegetation of the tailing cells at the White Mesa Mill Site will be completed following construction of the cover system. The revegetation process will establish a grass-forb-shrub community consisting primarily of native, long-lived perennial grasses, forbs, and shrubs that are highly adapted to the climatic and edaphic conditions of the site. Revegetation methods will follow state-of-the-art techniques for soil amendments, seedbed preparation, seeding and mulching. In addition, quality assurance and quality control procedures will be followed to ensure that revegetation methods are implemented correctly and the results of the process meet expectations.

J.2 PLANT SPECIES AND SEEDING RATES

The following 15 species (11 grasses, 2 forbs, and 2 shrubs) are proposed for the ET cover system at the White Mesa Mill site. These species were selected for their adaptability to site conditions, compatibility, and long-term sustainability. Species were also selected based on the assumption that institutional controls will exclude grazing by domestic livestock. The proposed species are:

- Western wheatgrass, variety Arriba (*Pascopyrum smithii*)
- Bluebunch wheatgrass, variety Goldar (*Pseudoroegneria spicata*)
- Slender wheatgrass, variety San Luis (*Elymus trachycaulus*)
- Streambank wheatgrass, variety Sodar (*Elymus lanceolatus ssp. psammophilus*)
- Pubescent wheatgrass, variety Luna (*Thinopyrum intermedium ssp. barbulatum*)
- Indian ricegrass, variety Paloma (*Achnatherum hymenoides*)
- Sandberg bluegrass, variety Canbar (*Poa secunda*)
- Sheep fescue, variety Covar (*Festuca ovina*)
- Squirreltail, variety Toe Jam Creek (*Elymus elymoides*)
- Blue grama, variety Hachita (*Bouteloua gracilis*)
- Galleta, variety Viva (*Hilaria jamesii*)
- Common yarrow, no variety (*Achillea millefolium*)
- White sage, variety Summit (*Artemisia ludoviciana*)
- Fourwing saltbush, variety Wytana (*Atriplex canescens*)
- Rubber rabbitbrush (*Ericameria nauseosus*).

The ecological characteristics of these species are described in detail in Appendix D.

Table J.1 presents broadcast seeding rates for each species. Seeding rates were developed based on the objective of establishing a permanent cover of grasses, forbs, and shrubs in a mixture that would promote compatibility among species and minimize competitive exclusion or loss of species over time. Seeding rates were developed on the basis of number of seeds per unit area (e.g. number of seeds per square foot) and then converted to weight per unit area (e.g. pounds per acre).

Table J.1. Species and seeding rates proposed for ET cover at the White Mesa Mill Site

Scientific Name	Common Name	Varietal Name	Native/ Introduced	Seeding Rate (lbs PLS/acre) [†]	Seeding Rate (# seeds/ft ²)
Grasses					
<i>Pascopyrum smithii</i>	Western wheatgrass	Arriba	Native	3.0	7.9
<i>Pseudoroegneria spicata</i>	Bluebunch wheatgrass	Goldar	Native	3.0	9.6
<i>Elymus trachycaulus</i>	Slender wheatgrass	San Luis	Native	2.0	6.2
<i>Elymus lanceolatus</i>	Streambank wheatgrass	Sodar	Native	2.0	7.3
<i>Elymus elymoides</i>	Squirreltail	Toe Jam	Native	2.0	8.8
<i>Thinopyrum intermedium</i>	Pubescent wheatgrass	Luna	Introduced [‡]	1.0	1.8
<i>Achnatherum hymenoides</i>	Indian ricegrass	Paloma	Native	4.0	14.7
<i>Poa secunda</i>	Sandberg bluegrass	Canbar	Native	0.5	11.4
<i>Festuca ovina</i>	Sheep fescue	Covar	Introduced [‡]	1.0	11.5
<i>Bouteloua gracilis</i>	Blue grama	Hachita	Native	1.0	16.5
<i>Hilaria jamesii</i>	Galleta	Viva	Native	2.0	7.3
Forbs					
<i>Achillea millefolium, variety occidentalis</i>	Common yarrow	VNS*	Native	0.5	32
<i>Artemisia ludoviciana</i>	White sage	VNS	Native	0.5	45
Shrubs					
<i>Atriplex canescens</i>	Fourwing saltbush	Wytana	Native	3.0	3.4
<i>Ericameria nauseosus</i>	Rubber rabbitbrush	VNS	Native	0.5	4.6
Total				26.5	188

[†]Seeding rate is for broadcast seed and presented as pounds of pure live seed per acre (lbs PLS/acre).

[‡]Introduced refers to species that have been 'introduced' from another geographic region, typically outside of North America. Also referred to as 'exotic' species. * VNS=Variety Not Specified but seed source would be designated from sites similar to the Mill Site.

Seeding rates are calculated from an expected field emergence for each species and the desired number of plants per unit area. For purposes of calculation, field emergence for small seeded grasses and forbs is assumed to be around 50 percent if germination is greater than 80 percent. Field emergence is assumed to be around 30 percent if germination is between 60 and 80 percent. The Natural Resource Conservation Service recommends a seeding rate of 20 to 30 pure live seeds per square foot as a minimum number of seeds when drill seeding single species in areas with an annual precipitation between 6 and 18 inches. Twenty pure live seeds per square foot, with an expected field emergence of 50 percent should produce an adequate number of plants on the seeded area to control erosion and suppress annual invasion. This seeding rate is primarily for favorable growing conditions, soils that are not extreme in texture, gentle slopes, north or east facing aspect, good moisture, adequate soil nutrients and single species vs. multiple species in a mixture. When conditions are less favorable when the seed is broadcast, or when multiple species are in a mixture the seeding rates are increased.

A Quality Assurance/Quality Control Plan for application rates and procedures for confirming that specified application rates are achieved is as follows. The first step begins with a seed order. Seed would be purchased as pounds of pure live seed. Each State has a seed certifying agency and certification programs may be adopted by seed growers. Certification of a container

of seed assures the customer that the seed is correctly identified and genetically pure. The State agency responsible for seed certification sets minimum standards for mechanical purity and germination for each species of seed. When certified, a container of seed must be labeled as to origin, germination percentage, date of the germination test, percentage of pure seed (by weight), other crop and weed seeds, and inert material. The certification is the consumer's best guarantee that the seed being purchased meets minimum standards and the quality specified.

Once the seed is obtained, seed labels would be checked to determine the percent PLS and the date that the seed was tested for percent purity and percent germination. If the test date is greater than 6 months old, the seed would be tested again before being accepted. Seed will be applied using a broadcasting method as described below.

J.3 SOIL FERTILIZATION AND ORGANIC MATTER AMENDMENT

The physical and chemical characteristics of the soil that will be used for the cover system are presented in Appendix D. Based on this analysis, there are three soil properties that appear to be deficient for sustained plant growth and will need to be treated prior to seeding and to ensure that the soil provides adequate carbon and plant essential nutrients for initial plant establishment and long-term sustainability. The soil properties that will need treatment include percent organic matter, total nitrogen, and plant available potassium (Appendix D). The upper 15 cm of the water storage layer will be treated with an organic matter amendment to alleviate the existing deficiencies. This treatment will be applied after the water storage layer is in place and before placement of the topsoil-gravel erosion protection layer. Further chemical analysis will be conducted prior to placement of the water storage layer to verify the chemical properties of this material and to finalize the proposed treatment. In order for the potential cover soil to function as a normal soil and provide long-term sustainable support for the vegetation component of the ET cover, it will be amended to improve organic matter content, nitrogen and potassium levels. An organic matter amendment will also improve available water holding capacity and cation exchange capacity. The proposed organic amendment is composted biosolids. Composted biosolids have been successfully used in mined land reclamation over the past 40 years. This amendment would also provide a source of soil microorganisms that will function to cycle nutrients over time and ensure sustainable plant growth. Composted biosolids would be applied at a rate of 10 tons/acre and incorporated into the upper six inches of the water storage layer of the cover system. Composted biosolids are also a source of nitrogen, phosphorous and potassium and will serve to improve organic matter content and soil fertility.

The topsoil-gravel erosion control layer will not be amended for organic matter or nutrients to avoid the stimulation of undesirable weedy species. The addition of nutrients, especially nitrogen, during revegetation is known to stimulate the growth of annual weeds at the potential detriment of seeded perennial species. Withholding nutrient additions from the topsoil-gravel cover will allow the seeded species to establish without the unwanted competition from undesirable weedy species.

J.4 SEEDBED PREPARATION

Following placement of the topsoil-gravel erosion protection layer, the area will be harrowed to reduce any compaction that may have occurred during placement of the cover and to create an uneven surface for optimum seedbed conditions. Since seeding will be conducted with a broadcast method it is critical for the soil surface to be loose and uneven, but also have a

firmness below the soil surface to allow proper seeding depth and to promote optimum seed-soil contact for germination and initial plant establishment.

J.5 SEEDING

Seed will be applied using a broadcasting method as soon as practicable following seedbed preparation. This procedure will use a centrifugal type broadcaster (or similar implement), also called an end-gate seeder. These broadcasters operate with an electric motor and are usually mounted on the back of a small tractor and generally have an effective spreading width of about 20 feet or more. Prior to seeding, a known area will be covered with a tarp and seed will be distributed using the broadcaster and simulating conditions that would exist under actual seeding conditions. Seed will then be collected and weighed to determine actual seeding rate in terms of pounds per acre. This process will be repeated until the specified seeding rate is obtained. During the seeding process, the seeding rate will be verified at least once by comparing pounds of seed applied to the size of the area seeded. In addition, seed will be applied in two separate passes. One-half of the seed will be spread in one direction and the other half of seed will be spread in a perpendicular direction. This will ensure that seed distribution across the site is highly uniform and also provide the opportunity to adjust the seeding rate if the specified rate is not being achieved. Seeding will not occur if wind speeds exceed 10 mph.

Immediately following seeding, the area will be lightly harrowed to provide seed coverage and to maximize seed-soil contact. This step in the revegetation process will ensure that the seed is placed at an optimum seeding depth and in good soil contact for proper germination conditions.

Seeding will take place as soon as practical after the cover system is in place. Successful seeding in southeastern Utah can occur either in late fall (e.g. October) as a dormant seeding, with germination and establishment occurring the following spring or can be conducted in June, prior to the summer monsoon season. The timing for seeding will be dependent upon the construction schedule for the cover system.

J.6 MULCHING

A mulch will be applied immediately following seeding to conserve soil moisture for seed germination and initial plant establishment. Mulching will also provide additional soil erosion protection from both wind and water until a plant cover is established. A weed-free, wood-fiber mulch will be applied to the seeded area at a rate of 1.5 tons/acre. Wood fiber mulch will consist of specially prepared wood fibers and will not be produced from recycled material such as sawdust, paper, cardboard, or residue from pulp and paper plants. The fibers will be dyed an appropriate color, non-toxic, water-soluble dye to facilitate visual metering during application. Wood fiber mulch will be supplied in packages and each package will be marked by the manufacturer to show the air-dry weight.

The wood fiber mulch will be applied by means of hydraulic equipment that utilizes water as the carrying agent. The mulch will be applied in a uniform manner at a minimum rate of 1.0 ton/acre. A continuous agitator action, that keeps the mulching material and approved additives in uniform suspension, will be maintained throughout the distribution cycle. The pump pressure will be capable of maintaining a continuous non-fluctuating stream of slurry. The slurry distribution lines will be large enough to prevent stoppage and the discharge line will be equipped with a set of hydraulic spray nozzles that will provide an even distribution of the mulch

slurry to the seedbed. Mulching will not be done in the presence of free surface water resulting from rains, melting snow, or other causes.

A tackifier will be used with the wood fiber mulch to improve adhesion. The tackifier will be a biodegradable organic formulation processed specifically for the adhesive binding of mulch. In addition, the tackifier will uniformly disperse when mixed with water and will not be detrimental to the homogeneous properties of the mulch slurry. Tackifier may be added either during the manufacturing of the mulch or incorporated during mulch application. Tackifier will have characteristics of hydrating and dispersing in circulating water to form a homogeneous slurry and remain in such a state in the hydraulic mulching unit when mixed with the wood fiber mulch. When applied, the tackifier will form a loose chain-like protective film, but not a plant inhibiting membrane, which will allow moisture to percolate into the underlying soil, while helping bind seeds to the soil surface during germination and initial seedling growth, after which the tackifier will break down through natural processes.

ATTACHMENT H

SUPPORTING DOCUMENTATION FOR INTERROGATORY 12/1:

**REVISED APPENDIX C, RADON EMANATION MODELING, TO THE UPDATED
TAILINGS COVER DESIGN REPORT (APPENDIX D OF THE RECLAMATION
PLAN, REVISION 5.0)**

APPENDIX C

RADON EMANATION MODELING

C.1 BACKGROUND

This appendix presents the results of modeling the emanation of radon-222 from the top surface of the proposed cover over the White Mesa tailing impoundments to achieve the State of Utah's long-term radon emanation standard for uranium mill tailings (Utah Administrative Code, Rule 313-24). These results comprise an update of radon emanation modeling presented in Attachment F of the 2009 Reclamation Plan (Denison, 2009) and Appendix H of the Infiltration and Contaminant Transport Modeling Report (Denison, 2010), as well as an update to Appendix C of the 2011 Updated Tailings Cover Design report (MWH, 2011). This appendix provides a summary of additional analyses of radon attenuation through the proposed evapotranspiration (ET) cover, and incorporates the revised cover grading design, results of cover material testing conducted in 2010 and 2012 (summarized in Attachment B of EFRI, 2012), and results of tailings testing conducted in 2013 (presented in MWH, 2015).

The final version of this appendix will be provided as Appendix C to the next version of the Updated Tailings Cover Design report. The Updated Tailings Cover Design report will be submitted as an attachment to the next version of the Reclamation Plan.

The monolithic ET cover system evaluated in this appendix consists of the following layers from top to bottom:

- 0.5 ft (15 cm) Erosion Protection Layer (gravel-admixture or topsoil)
- 3.5 ft (107 cm) Water Storage/Biointrusion/Frost Protection/Radon Attenuation Layer (loam to sandy clay)
- 3.0 to 4.0 ft (91 to 122 cm) Radon Attenuation Layer (highly compacted loam to sandy clay)
- 2.5 ft (76 cm) Radon Attenuation and Grading Layer (loam to sandy clay)

The loam to sandy clay soil used to construct the ET cover, referred to in previous reports (Titan 1996, Knight Piesold 1999) as random/platform fill, is stockpiled at the site.

C.2 DESCRIPTION OF MODEL AND INPUT VALUES

The thickness of the reclamation cover necessary to limit radon emanation from the disposal areas was analyzed using the NRC RADON model (NRC, 1989). The model utilizes the one-dimensional radon diffusion equation, which uses the physical and radiological characteristics of the tailings and overlying materials to calculate the rate of radon emanation from the tailings through the cover. The model was used to calculate the cover thickness required to limit the radon emanation rate through the top of the cover to 20 picocuries per square meter per second ($\text{pCi}/\text{m}^2\text{-s}$), following the guidance presented in U.S. Nuclear Regulatory Commission (NRC) publications NUREG/CR-3533 and Regulatory Guide 3.64 (NRC 1984, 1989). The rate of emanation standard is applied to the average emanation over the entire surface of the disposal area.

The input parameters used in the model are based on engineering experience with similar projects, recent laboratory testing results for samples of random fill (summarized in Attachment B of EFRI, 2012) and tailings (MWH, 2015), in addition to available data from previous work by others, including Chen and Associates (1978, 1979, 1987), Rogers and Associates Engineering Corporation (1988), Western Colorado Testing (1999a, 1999b), IUC (2000), and Titan (1996).

The available data from testing performed by others was summarized in Appendix A of the Updated Tailings Cover Design report (MWH, 2011). Appendix A will be revised for the next version of the Updated Tailings Cover Design report to include data from recent random fill and tailings testing. The input parameters and values used in the model are outlined below.

C.2.1 Thickness of Tailings

The thickness of tailings currently deposited in Cells 2 and 3 is approximately 30 ft (914 cm), while the anticipated tailings thickness deposited in Cells 4A and 4B will be approximately 42 ft (1,280 cm). As documented in NRC Regulatory Guide 3.64, a tailings thickness greater than 100 to 200 cm is effectively equivalent to an infinitely thick radon source. Therefore, a thickness of 500 cm may be used in RADON to represent an equivalent infinitely thick tailings source of radon.

C.2.2 Radium Activity Concentration

The radium-226 activity concentration values for the tailings in the impoundments are estimated based on material inventory data provided by Energy Fuels Resources (USA), Inc. (EFRI). A summary of the material inventories for Cells 2 and 3 and the projected inventory for Cells 4A and 4B is provided in Attachment C.1. The radium-226 and thorium-230 activity concentrations are listed for each material in the inventories. These values were used to calculate a weighted average for radium-226 and thorium-230 activity concentrations for the tailings using the volume of material placed in Cells 2 and 3. In addition, these values were used to project radium-226 and thorium-230 activity concentrations for the materials to be placed in Cells 4A and 4B. Calculations for radium-226 from decay of thorium-230 were also made. These calculations are also provided in Attachment C.1. The results for Cell 3 and Cells 4A and 4B indicate the highest radium-226 values are a result of original radium-226 and radium-226 from thorium-230 decay at approximately 1000 years. The results are summarized below and in Table C.1.

Table C.1. Radium Activity Concentrations

Tailings Cell	Weighted Average Radium-226 Activity Concentration (pCi/g)	Weighted Average Thorium-230 Activity Concentration (pCi/g)	Total Radium-226 Activity Concentration (original radium-226 and radium-226 from thorium-230 decay) (pCi/g)
Cell 2	923	923	923
Cell 3	606	1048	758
Cells 4A and 4B	617	695	642

Random Fill and Erosion Protection. The radium activity of the random fill and erosion protection layer is assumed to be zero, based on guidance in Regulatory Guide 3.64 (NRC, 1989) which states that radium activity in the cover soils may be neglected for cover design purposes provided the cover soils are obtained from background materials that are not associated with ore formations or other radium-enriched materials.

C.2.3 Radon Emanation Coefficient

The radon emanation coefficient used in the model for the tailings is 0.20 based on laboratory data (Rogers & Associates, 1988) and the recommendation in NUREG-1620 (NRC, 2003) to use a value of 0.20 for tailings if there is limited site-specific data.

The radon emanation coefficient used in the model for the cover layers is 0.35. This is the conservative default value used in the RADON model.

C.2.4 Specific Gravity, Density and Porosity

The densities and porosities of the tailings and cover materials used in the model are based on laboratory testing results. The values are summarized in Table C.2 and discussed in more detail below.

Table C.2. Density and Porosity Values

Material	Specific Gravity	Degree of Compaction (%)	Placed Density (pcf)	Placed Density (g/cc)	Porosity
Erosion Protection (topsoil)	2.61	85% SP	100	1.6	0.38
Erosion Protection (rock mulch)*	2.62	85% SP	106	1.7	0.35
Random fill (low compaction water storage, rooting zone)	2.63	85% SP	100	1.6	0.39
Random Fill (high compaction)	2.63	95% SP	112	1.8	0.32
Random Fill (in place, low compaction, platform fill)	2.63	80% SP	94	1.5	0.43
Tailings	2.80	---	96	1.5	0.45

SP = standard proctor compaction

* Estimated by applying a 25% rock correction to the topsoil

The specific gravity of the tailings was estimated as 2.80 based as the weighted average specific gravity from laboratory tests using estimated percentages of sand, sand-slime, and slime tailings of 10, 65, and 25 percent, respectively (MWH, 2015). The dry density of the tailings was estimated as 96 pcf, based on laboratory tests (Chen and Associates, 1987 and Western Colorado Testing, 1999b) and assuming the upper bound long-term density of the tailings should be no greater than 90 percent of the average laboratory measured maximum dry density for the tailings. The referenced reports are provided as part of Appendix A.1 of MWH (2011). The porosity of the tailings was calculated using the estimated specific gravity and dry density based on the following equation:

$$n = 1 - \left(\frac{\gamma_d}{G_s \gamma_w} \right) \quad (\text{Eq. C.1})$$

where

n = porosity,

γ_d = dry density of soil,

G_s = specific gravity of soil, and

γ_w = unit weight of water.

The specific gravity and dry density values used in the model for the random fill layers were estimated by laboratory tests (ATT, 2010 and UWM, 2012). The referenced reports will be

provided as part of Appendix A.2 of the next version of the Updated Tailings Cover Design report. These reports were presented in Attachment B of EFRI (2012). The estimation for the values used in the model is provided in Attachment C.2. The porosity values for the layers were calculated using equation C.1. The proposed cover system has three layers of random fill placed at different levels of compaction. The lower layer of random fill consists of a minimum thickness of 2.5 feet of random fill that is assumed to be dumped and minimally compacted by construction equipment to approximately 80 percent standard Proctor. The middle layer (3.0 – 4.0 feet) of random fill will be compacted to 95 percent of standard Proctor. In Cell 2 and parts of Cell 3, the lower layer of random fill is already placed and is approximately 3 feet. It is assumed the upper 6 inches of this fill will be part of the middle random fill layer and can be compacted by additional passes of compactors to reach 95 percent of standard Proctor compaction. The uppermost 3.5 feet of random fill will be placed at 85 percent of standard Proctor compaction in order to optimize water storage and rooting characteristics for plant growth.

The 0.5 foot erosion protection layer is assumed to be topsoil or rock mulch consisting of topsoil material mixed with 25 percent gravel by weight. The specific gravity and density of the topsoil was estimated to be 2.61 and 100 pcf, respectively, based on laboratory testing results for topsoil (UWM, 2012). The specific gravity and density of the rock mulch was estimated to be 2.62 and 106 pcf, respectively, based on laboratory testing results for topsoil (UWM, 2012) and applying a rock correction based on 25 percent gravel by weight.

C.2.5 Long-term Moisture Content

The long-term moisture content value for the tailings is assumed to be 6 percent. This is a conservative assumption, per NRC Regulatory Guide 3.64 (NRC, 1989), which represents the lower bound for moisture in western soils and is typically used as a default value for the long-term water content of tailings. Use of 15 bar water contents to estimate a long-term water content is one of the methods recommended in NRC (2003) for radon emanation modeling.

MWH collected representative samples from the on-site random fill and topsoil stockpiles for use in estimating the long-term moisture contents for the random fill and erosion protection cover layers. The laboratory results for the 15 bar water contents for these samples were used to estimate long-term water contents for the random fill and erosion protection layers.

The long-term water content of the topsoil was estimated as 5.2 percent based on the measured 15 bar gravimetric water content for a topsoil sample (E1-A) which represents the average index properties for the topsoil stockpiles (UWM, 2012). The long-term water content of the rock mulch was estimated as 4 percent based on the addition of 25 percent gravel by weight to the topsoil.

Based on the cover material gradations, the cover soils were bracketed into three groups, finer grained soils, uniform graded soils, and broadly graded soils. A weighted average procedure that accounts for the size of soil type based on the stockpile volumes was incorporated to determine the average long-term gravimetric water content for the random fill using the measured 15 bar water contents. The estimation of the long-term water content value for the cover material is provided in Attachment C.2.

The average long-term moisture contents are summarized in Table C.3.

Table C.3. Estimated Long-Term Moisture Contents

Material	Gravimetric Water Content (%)
Erosion Protection (topsoil)	5.2
Erosion Protection (rock mulch)	4.0
Random fill	6.7
Tailings	6.0

C.2.6 Diffusion Coefficient

The radon diffusion coefficient used in the RADON model can either be calculated based on an empirical relationship dependent upon porosity and the degree of saturation or input directly in the model using values measured from laboratory testing. Although laboratory test data was available for the tailings and the cover material (Rogers & Associates 1988), tests were performed at porosities and water contents different than those estimated to represent long-term conditions. Therefore, the empirical relationship presented in Rogers and Nielson (1991) was used, resulting in the calculated values summarized in Table C.4 below.

Table C.4. Estimated Radon Diffusion Coefficients

Material	Diffusion Coefficient (cm²/s)
Erosion Protection (rock mulch)	0.0254
Random Fill (low compaction water storage, rooting zone)	0.0225
Random Fill (high compaction)	0.0160
Random Fill (in place, low compaction, platform fill)	0.0260
Tailings	0.0288

C.3 MODEL RESULTS

The radon emanation modeling results show that the designed cover systems presented in Table C.5 will reduce the rate of radon emanation to values below the limit of 20 picocuries per square meter per second (pCi/m²-s) averaged over the entire area of the tailings impoundments, which is the regulatory criterion (Utah Administrative Code, Rule 313-24). The RADON model output is provided in Attachment C.3.

Table C.5. Summary of Results

Cover Layer	Cover Thickness (ft)		
	Cell 2	Cell 3	Cells 4A/4B
Erosion Protection (rock mulch or topsoil)	0.5	0.5	0.5
Random Fill (low compaction water storage, rooting zone)	3.5	3.5	3.5
Random Fill (high compaction)	4.0	3.5	3.0
Random Fill (in place, low compaction, platform fill)	2.5	2.5	2.5
Total Cover Thickness	10.5	10.0	9.5

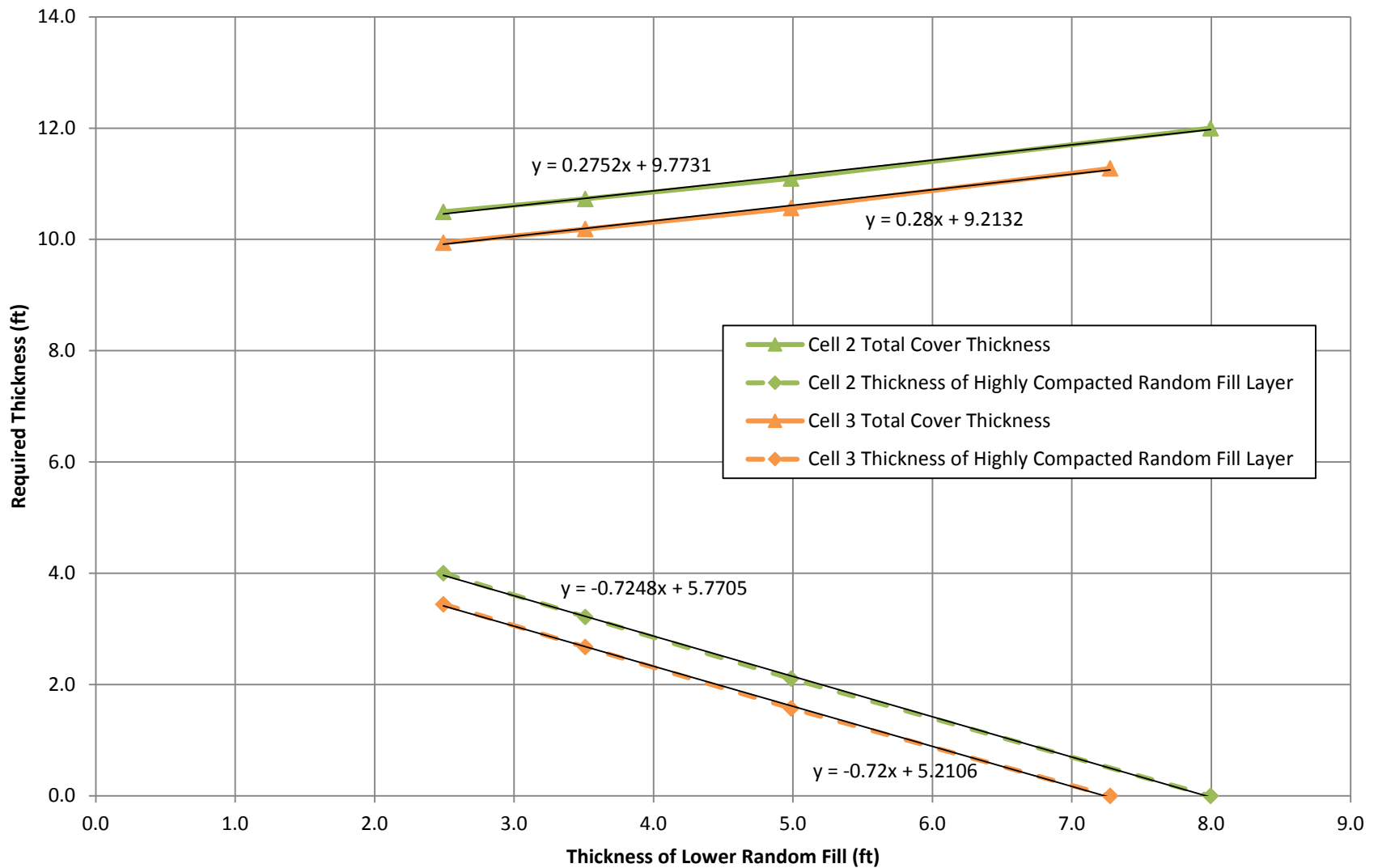
C.4 IMPACTS OF INCREASED THICKNESS OF RANDOM FILL

Radon modeling as discussed above assumed that the lower layer of random fill was placed at 80 percent of standard Proctor compaction, and had a thickness of 2.5 feet (assuming top 6 inches can be compacted to 95 percent of standard Proctor density prior to placement of additional fill). However, there are some areas within Cells 2 and 3 which show thicknesses of existing random fill greater than 3.0 feet. Additional modeling was performed to determine the minimum thickness of highly compacted random fill required in order to meet regulatory criterion to limit the radon emanation rate through the top of the cover to 20 pCi/m²-s. This modeling indicates that for every extra foot of low-compaction random fill (80 percent standard Proctor compaction), the highly compacted random fill layer (95 percent standard Proctor compaction) can be reduced in thickness by approximately 0.75 feet. This trend is shown in Figure C.1. The RADON model output is provided in Attachment C.4.

C.5 REFERENCES

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ATTACHMENT C.1
RADIUM-226 ESTIMATION TABLES

Energy Fuels Resources (USA) Inc.

White Mesa Mill Site, Summary of Processed Ores and Alternate Feeds

Material Category/Location	Origin/ Description	Dates	Total Mass Ores Processed (tons)	%U ₃ O ₈	Ra-226 Activity Conc. ^a (pCi/g)	Th-230 Activity Conc. ^b (pCi/g)	Reference/Comments
Processed Ores							
Natural Ores	Arizona Strip Ores	1980 - 2000	1,000,000	0.55	1546.6	1546.6	Total quantity for both ores from Denison (2009, 2011), ore grades and quantity breakdown from Roberts (2012b)
	Colorado Plateau Ores	1980 - 2000	2,840,536	0.25	703.0	703.0	Total quantity for both ores from Denison (2009, 2011), ore grades and quantity breakdown from Roberts (2012b)
	Pandora	2008-2011	231,191	0.218	613.0	613.0	Data provided from D. Turk (2012a)
	Daneros	2010-2011	71,287	0.269	756.4	756.4	Data provided from D. Turk (2012a)
	Beaver	2010-2011	90,280	0.174	489.3	489.3	Data provided from D. Turk (2012a)
	Arizona 1	2010-2011	41,863	0.608	1709.7	1709.7	Data provided from D. Turk (2012a)
	Sunday	2008-2011	20,251	0.178	500.5	500.5	Data provided from D. Turk (2012a)
	West Sunday	2008-2010	79,744	0.157	441.5	441.5	Data provided from D. Turk (2012a)
	Topaz	2008-2010	16,869	0.128	359.9	359.9	Data provided from D. Turk (2012a)
	St. Jude	2008-2010	29,572	0.167	469.6	469.6	Data provided from D. Turk (2012a)
	Tony M	2008-2009	189,876	0.131	368.4	368.4	Data provided from D. Turk (2012a)
	Dawn Mining	2009-2010	2,875	0.456	1282.3	1282.3	Data provided from D. Turk (2012a)
	Carnation	2009-2010	5,584	0.166	466.8	466.8	Data provided from D. Turk (2012a)
	Purchased Ore	2010-2011	18,008	0.146	410.6	410.6	Data provided from D. Turk (2012a)
	Humbug Cressler	2011	118	0.044	123.7	123.7	Data provided from D. Turk (2012a)
Alternate Feeds							
	Linde	Soil	1996-1999, 2002-2003, 2007	258,992	33	133	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
	Ashland 1	Soil	1996-1999, 2002-2003	317,831	91.3	1849	Date range est. from Denison (2011) and Roberts (2012c). Quantities and activities est. from Roberts (2012a,2012c).
	Heritage	Monazite sands	1996-1999, 2002-2003, 2007	7,374	19.4	10.6	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
	Cabot	Tantalum residues	1996-1999	16,828	772	118	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
	Ashland 2	Soil	1996-1999	43,981	91.3	1849	Date range est. from Denison (2011) and Roberts (2012c). Quantities and activities est. from Roberts (2012a,2012c).
	Cameco	KF product	1996-1999	1,966	0.6	5.3	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
	Allied Signal/Honeywell	Calcium Fluoride	1996-1997	2,343	989	23800	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
	Cameco	Phosph. regen. product	1996-1999	557	2.70	2.10	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
	Cameco	Calcined product	1996-1999	2,197	1040	9170	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
	Allied Signal	KOH solution recovery	1996-1999	1,526	989	0.00	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Harold (2012a) and Turk (2012b).
	Rhone-Poulenc	Uranyl nitrate hexahydrate	1996-1997	17	156	2550	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Harold (2012a) and Turk (2012b).
	Cameco	UF4 with filter ash	1996-1999	10	156	2550	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
	Nev. Test Site	Cotter Concentrate	1996-1997	420	3590	585000	Date range est. from Denison (2011) and Roberts (2012c). Quantities and activities est. from Roberts (2012a,2012c).
	Molycorp		2002-2003, 2007	11,689	38.6	268.0	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
	Cabot	Tantalum residues	2011	8,700	772	118	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
	Cameco	UF4	2009-2010	462	156	2550	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
	Allied Signal/Honeywell	Calcium Fluoride	2011	1,969	989	23800	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
	FMRI (Fansteel)		2011	1,369	236	4.9	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).

Notes:

^aValues for ores estimated using method in NRC Reg. Guide 3.64 (1989) of multiplying the ore grade by 2812 pCi/g.

^bValues for thorium estimated as Ra-226 values.

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Energy Fuels Resources (USA) Inc.
Estimation of Cell 2 Ra-226 and Th-230 Activity Concentrations for Tailings

Material Category/Location	Origin/ Description	Dates	Total Mass Ores Processed (tons)	Total Mass Ore Processed for Cell 2 ^a (tons)	%U ₃ O ₈	Ra-226 Activity Conc. ^b (pCi/g)	Th-230 Activity Conc. ^c (pCi/g)	Reference/Comments
Processed Ores								
Natural Ores	Arizona Strip Ores	1980 - 2000	1,000,000	598,875	0.55	1547	1547	Total quantity for both ores from Denison (2009, 2011), ore grades and quantity breakdown from Roberts (2012b)
	Colorado Plateau Ores	1980 - 2000	2,840,536	1,701,125	0.25	703	703	Total quantity for both ores from Denison (2009, 2011), ore grades and quantity breakdown from Roberts (2012b)
	Total Tons		2,300,000		Weighted Ave.	923	923	

Notes:
^aEstimated from total tons of tailings to Cell 2 from Denison (2009), Attachment E. Estimated mass is for ore processed. Material placed in Cell 2 are only those listed in the table (Roberts, 2012c).
^bValues for ores estimated using method in NRC Reg. Guide 3.64 (1989) of multiplying the ore grade by 2812 pCi/g.
^cValues for thorium estimated as Ra-226 values.

References:
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Energy Fuels Resources (USA) Inc.
Estimation of Cell 3 Ra-226 and Th-230 Activity Concentrations for Tailings

Material Category/Location	Origin/ Description	Dates	Total Mass Ores Processed (tons)	Total Mass Ore Processed for Cell 3 ^a (tons)	%U ₃ O ₈	Ra-226 Activity Conc. ^a (pCi/g)		Th-230 Activity Conc. ^b (pCi/g)		Reference/Comments
Processed Ores										
Natural Ores	Arizona Strip Ores	1980 - 2000	1,000,000	401,125	0.55	1546.6	253.15	1546.6	253.15	Total quantity for both ores from Denison (2009, 2011), ore grades and quantity breakdown from Roberts (2012b)
	Colorado Plateau Ores	1980 - 2000	2,840,536	1,139,411	0.25	703.0	326.85	703.0	326.85	Total quantity for both ores from Denison (2009, 2011), ore grades and quantity breakdown from Roberts (2012b)
	Pandora	2008	80,046	80,046	0.218	613.0	20.02	613.02	20.02	Data provided from D. Turk (2012a)
	Sunday	2008	12,066	12,066	0.178	500.5	2.46	500.54	2.46	Data provided from D. Turk (2012a)
	West Sunday	2008	53,613	53,613	0.157	441.5	9.66	441.48	9.66	Data provided from D. Turk (2012a)
	Topaz	2008	8,746	8,746	0.128	359.9	1.28	359.94	1.28	Data provided from D. Turk (2012a)
	St. Jude	2008	15,140	15,140	0.167	469.6	2.90	469.60	2.90	Data provided from D. Turk (2012a)
	Tony M	2008	74,802	74,802	0.131	368.4	11.24	368.37	11.24	Data provided from D. Turk (2012a)
Alternate Feeds										
	Linde Soil	1996-1999, 2002-2003, 2007	258,992	258,992		33	3.49	133	14.06	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
	Ashland 1 Soil	1996-1999, 2002-2003	317,831	317,831		91.3	11.84	1849	239.80	Date range est. from Denison (2011) and Roberts (2012c). Quantities and activities est. from Roberts (2012a,2012c).
	Heritage Monazite sands	1996-1999, 2002-2003, 2007	7,374	7,374		19.4	0.06	10.6	0.03	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
	Cabot Tantalum residues	1996-1999	16,828	16,828		772	5.30	118	0.81	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
	Ashland 2 Soil	1996-1999	43,981	43,981		91.3	1.64	1849	33.18	Date range est. from Denison (2011) and Roberts (2012c). Quantities and activities est. from Roberts (2012a,2012c).
	Cameco KF product	1996-1999	1,966	1,966		0.6	0.00	5.3	0.00	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
	Allied Signal/Honeywell Calcium Fluoride	1996-1997	2,343	2,343		989	0.95	23800	22.75	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
	Cameco Phosph. regen. product	1996-1999	557	557		2.70	0.00	2.10	0.00	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
	Cameco Calcined product	1996-1999	2,197	2,197		1040	0.93	9170	8.22	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
	Allied Signal KOH solution recovery	1996-1999	1,526	1,526		989	0.62	0.00	0.00	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Harold (2012a) and Turk (2012b).
	Rhone-Poulenc Uranyl nitrate hexahydrate	1996-1997	17	17		156	0.00	2550	0.02	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Harold (2012a) and Turk (2012b).
	Cameco UF4 with filter ash	1996-1999	10	10		156	0.00	2550	0.01	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
	Nev. Test Site Cotter Concentrate	1996-1997	420	420		3590	0.62	585000	100.26	Date range est. from Denison (2011) and Roberts (2012c). Quantities and activities est. from Roberts (2012a,2012c).
	Molycorp	2002-2003, 2007	11,689	11,689		38.6	0.18	268.0	1.28	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
			Total Tons	2,450,679	Weighted Ave.	606		1048		

Notes:

^aEstimated from total tons of tailings to Cell 2 and capacity of Cell 3 from Denison (2009), Attachment E. Material placed before 2009 was placed in Cells 2 and 3 (Roberts, 2012c).

^bValues for ores estimated using method in NRC Reg. Guide 3.64 (1989) of multiplying the ore grade by 2812 pCi/g.

^cValues for thorium estimated as Ra-226 values.

References:

- Denison Mines USA Corporation (Denison), 2009. Reclamation Plan, White Mesa Mill, Blanding Utah, Revision 4.0, November.
Denison Mines USA Corporation (Denison), 2011. Reclamation Plan, White Mesa Mill, Blanding Utah, Revision 5.0, September.
Roberts, H., 2012a. Electronic communication including files "InvThNov00.xls and Inventory Umass in tails.xls" from Harold Roberts, Denison Mines (USA) Corp., to Melanie Davis, MWH Americas, Inc., July 20.
Roberts, H., 2012b. Personal communication from Harold Roberts, Denison Mines (USA) Corp., to Melanie Davis, MWH Americas, Inc., June 21.
Roberts, H., 2012c. Electronic communication including file "Alternate Feed Tons.pdf" and personal communication from Harold Roberts, Denison Mines (USA) Corp., to Melanie Davis, MWH Americas, Inc., July 24.
Turk, D., 2012a. Electronic communication including file "Ore Numbers.pdf" from David Turk, Denison Mines (USA) Corp., to Melanie Davis, MWH Americas, Inc., June 8.
Turk, D., 2012b. Electronic communication including file "DAC s Calculations 2012_rev6-29-12" from David Turk, Denison Mines (USA) Corp., to Melanie Davis, MWH Americas, Inc., June 29.

Energy Fuels Resources (USA) Inc.

Estimation of Cell 4A and 4B Ra-226 and Th-230 Activity Concentrations for Tailings

Material Category/Location	Origin/ Description	Dates	Total Mass Ore/Alt. Feed Processed ^a (tons)	%U ₃ O ₈	Ra-226 Activity Conc. ^b (pCi/g)	Th-230 Activity Conc. ^c (pCi/g)	Reference/Comments
Processed Ores							
Pandora		2009-2011	151,145	0.218	613.0	613.0	Data provided from D. Turk (2012a)
Daneros		2010-2011	71,287	0.269	756.4	756.4	Data provided from D. Turk (2012a)
Beaver		2010-2011	90,280	0.174	489.3	489.3	Data provided from D. Turk (2012a)
Arizona 1		2010-2011	41,863	0.608	1709.7	1709.7	Data provided from D. Turk (2012a)
Sunday		2009-2011	8,185	0.178	500.5	500.5	Data provided from D. Turk (2012a)
West Sunday		2009-2010	26,131	0.157	441.5	441.5	Data provided from D. Turk (2012a)
Topaz		2009-2010	8,123	0.128	359.9	359.9	Data provided from D. Turk (2012a)
St. Jude		2009-2010	14,432	0.167	469.6	469.6	Data provided from D. Turk (2012a)
Tony M		2009	115,074	0.131	368.4	368.4	Data provided from D. Turk (2012a)
Dawn Mining		2009-2010	2,875	0.456	1282.3	1282.3	Data provided from D. Turk (2012a)
Carnation		2009-2010	5,584	0.166	466.8	466.8	Data provided from D. Turk (2012a)
Purchased Ore		2010-2011	18,008	0.146	410.6	410.6	Data provided from D. Turk (2012a)
Humbug Cressler		2011	118	0.044	123.7	123.7	Data provided from D. Turk (2012a)
Alternate Feeds							
Cabot	Tantalum residues	2011	8,700		772	118	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
Cameco	UF4	2009-2010	462		156	2550	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
Allied Signal/Honeywell	Calcium Fluoride	2011	1,969		989	23800	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
FMRI (Fansteel)		2011	1,369		236	4.9	Date range est. from Denison (2011) and Roberts (2012c). Quantities est. from Roberts (2012a,2012c). Activities est. from Turk (2012b).
Weighted Ave.					617	695	

Notes:

^aCurrent tailings in Cell 4A and future tailings to Cell 4A and 4B are projected to be from ores and alternative feeds similar to those processed after 2008 (Roberts, 2012c).

^bValues for ores estimated using method in NRC Reg. Guide 3.64 (1989) of multiplying the ore grade by 2812 pCi/g.

^cValues for thorium estimated as Ra-226 values.

References:

- Denison Mines USA Corporation (Denison), 2009. Reclamation Plan, White Mesa Mill, Blanding Utah, Revision 4.0, November.
- Denison Mines USA Corporation (Denison), 2011. Reclamation Plan, White Mesa Mill, Blanding Utah, Revision 5.0, September.
- Roberts, H., 2012a. Electronic communication including files "InvThNov00.xls and Inventory Umass in tails.xls" from Harold Roberts, Denison Mines (USA) Corp., to Melanie Davis, MWH Americas, Inc., July 20.
- Roberts, H., 2012b. Personal communication from Harold Roberts, Denison Mines (USA) Corp., to Melanie Davis, MWH Americas, Inc., June 21.
- Roberts, H., 2012c. Electronic communication including file "Alternate Feed Tons.pdf" and personal communication from Harold Roberts, Denison Mines (USA) Corp., to Melanie Davis, MWH Americas, Inc., July 24.
- Turk, D., 2012a. Electronic communication including file "Ore Numbers.pdf" from David Turk, Denison Mines (USA) Corp., to Melanie Davis, MWH Americas, Inc., June 8.
- Turk, D., 2012b. Electronic communication including file "DAC s Calculations 2012_rev6-29-12" from David Turk, Denison Mines (USA) Corp., to Melanie Davis, MWH Americas, Inc., June 29.

Energy Fuels Resources (USA) Inc. White Mesa Mill**Tailings Cell 2****Calculation of Ra-226 Concentrations Due to Future Decay of Th-230**

The Ra-226 concentration at various times in the future depends on both the decay of the Ra-226 currently present and the ingrowth from Th-230. The Ra-226 decays with a half-life of 1602 years. The ingrowth is also a function of the Ra-226 half-life (1602 years) and the Th-230 half-life (77,000 years).

$A \text{ (Ra-226) at a time } t \text{ (years)} = [A \text{ (Ra-226) at } t=0][\exp(-0.693t/1602 \text{ years})]$

$A \text{ (Ra-226 from decay of Th-230 at time } t \text{ (years))} = [A \text{ (Th-230)}][1 - \exp(-0.693t/1602 \text{ years})][\exp(-0.693t/77,000 \text{ years})]$

Residual Ra-226 at time t

Time (years)	$\exp(-0.693t/1602)$	Initial Ra-226 Concentration (pCi/g) Cell 2	Ra-226 Concentration at time t (pCi/g) Cell 2
0	1.000	923	923
100	0.958	923	884
200	0.917	923	847
500	0.805	923	743
1000	0.649	923	599

Ra-226 Concentration from Ingrowth Due to Decay of Th-230

Time (years)	$\exp(-0.693t/1602)$	Initial Th-230 Concentration (pCi/g) S.I.	Ra-226 Concentration at time t (pCi/g) S.I.	$\exp(-0.693t/77000)$
0	1.000	923	0	1.000
100	0.958	923	39	0.999
200	0.917	923	76	0.998
500	0.805	923	179	0.996
1000	0.649	923	321	0.991

Total Ra-226 Concentration at Time t (original Ra-226 and Ra-226 from Th-230 decay)

Time (years)	Total Ra-226 Concentration (pCi/g) avg. S.I.
0	923
100	923
200	923
500	922
1000	920

Energy Fuels Resources (USA) Inc. White Mesa Mill**Tailings Cell 3****Calculation of Ra-226 Concentrations Due to Future Decay of Th-230**

The Ra-226 concentration at various times in the future depends on both the decay of the Ra-226 currently present and the ingrowth from Th-230. The Ra-226 decays with a half-life of 1602 years. The ingrowth is also a function of the Ra-226 half-life (1602 years) and the Th-230 half-life (77,000 years).

$A \text{ (Ra-226) at a time } t \text{ (years)} = [A \text{ (Ra-226) at } t=0][\exp(-0.693t/1602 \text{ years})]$

$A \text{ (Ra-226 from decay of Th-230 at time } t \text{ (years))} = [A \text{ (Th-230)}][1 - \exp(-0.693t/1602 \text{ years})][\exp(-0.693t/77,000 \text{ years})]$

Residual Ra-226 at time t

Time (years)	$\exp(-0.693t/1602)$	Initial Ra-226 Concentration (pCi/g) Cell 3	Ra-226 Concentration at time t (pCi/g) Cell 3
0	1.000	606	606
100	0.958	606	580
200	0.917	606	556
500	0.805	606	488
1000	0.649	606	393

Ra-226 Concentration from Ingrowth Due to Decay of Th-230

Time (years)	$\exp(-0.693t/1602)$	Initial Th-230 Concentration (pCi/g) S.I.	Ra-226 Concentration at time t (pCi/g) S.I.	$\exp(-0.693t/77000)$
0	1.000	1048	0	1.000
100	0.958	1048	44	0.999
200	0.917	1048	87	0.998
500	0.805	1048	203	0.996
1000	0.649	1048	365	0.991

Total Ra-226 Concentration at Time t (original Ra-226 and Ra-226 from Th-230 decay)

Time (years)	Total Ra-226 Concentration (pCi/g) avg. S.I.
0	606
100	625
200	642
500	691
1000	758

Energy Fuels Resources (USA) Inc. White Mesa Mill

Tailings Cells 4A/B

Calculation of Ra-226 Concentrations Due to Future Decay of Th-230

The Ra-226 concentration at various times in the future depends on both the decay of the Ra-226 currently present and the ingrowth from Th-230. The Ra-226 decays with a half-life of 1602 years. The ingrowth is also a function of the Ra-226 half-life (1602 years) and the Th-230 half-life (77,000 years).

$$A \text{ (Ra-226) at a time } t \text{ (years)} = [A \text{ (Ra-226) at } t=0][\exp(-0.693t/1602 \text{ years})]$$

$$A \text{ (Ra-226 from decay of Th-230 at time } t \text{ (years))} = [A \text{ (Th-230)}][1 - \exp(-0.693t/1602 \text{ years})][\exp(-0.693t/77,000 \text{ years})]$$

Residual Ra-226 at time t

Time (years)	$\exp(-0.693t/1602)$	Initial Ra-226 Concentration (pCi/g) Cell 4A/B	Ra-226 Concentration at time t (pCi/g) Cell 4A/B
0	1.000	617	617
100	0.958	617	591
200	0.917	617	566
500	0.805	617	497
1000	0.649	617	400

Ra-226 Concentration from Ingrowth Due to Decay of Th-230

Time (years)	$\exp(-0.693t/1602)$	Initial Th-230 Concentration (pCi/g) S.I.	Ra-226 Concentration at time t (pCi/g) S.I.	$\exp(-0.693t/77000)$
0	1.000	695	0	1.000
100	0.958	695	29	0.999
200	0.917	695	57	0.998
500	0.805	695	135	0.996
1000	0.649	695	242	0.991

Total Ra-226 Concentration at Time t (original Ra-226 and Ra-226 from Th-230 decay)

Time (years)	Total Ra-226 Concentration (pCi/g) avg. S.I.
0	617
100	620
200	623
500	632
1000	642

ATTACHMENT C.2

COVER MATERIAL PARAMETERS ESTIMATION TABLE

ENERGY FUELS RESOURCES (USA) INC. WHITE MESA MILL

Summary of Laboratory Testing Results for Borrow Stockpiles

Borrow Stockpile ID	Estimated Stockpile Volume ¹ (cy)	Field Investigation Date	Material Description	USCS	Sample ID	Sample Depth (ft)	Gravimetric Water Content (%)	Atterberg Limits ² LL/PL/PI (%)	PI	Specific Gravity	% Gravel	%Sand	%Silt	% Clay	% Fines	Max. Density (pcf)	Opt. Moist. Cont. (%)	Ksat (cm/s)	15bar Grav. Water Content (%)	Soil Group ⁴
E1	15,900	Apr-2012	Topsoil (Sandy Silty Clay)	CL-ML	E1-A	0 - 3	--	23/18/5	5	2.61	0	41	43	16	59	118	11	1.3 x 10 ⁻⁴	5.2	Topsoil
E2	92,000	Oct-2010	Silty Sand/Clayey Sand	SM	A	5	4.5	NP	NP	--	0.5	77.1	13.5	8.9	22					B
				SC	B	12	5.7	23.3/11.2/12.1	12.1	2.64	13.1	50.3	22.6	14.0	37					U
E3	16,800	Apr-2012	Clay with Sand	CH	E3-A	0 - 3	--	54/24/30	30	2.53	0	23	29	48	77	105	19	9.5 x 10 ⁻⁵	13.6	F
E4	66,600	Oct-2010	Sandy Clay	CL	A	5	8.6	30.3/14.4/15.9	15.9	--	0.0	41.2	39.1	19.7	59					U
E5	68,800	Oct-2010	Sandy Clay	CL	A	6	9.0	33.2/14.3/18.9	18.9	--	0.0	35.5	38.1	26.4	65					F
		Apr-2012	Clay with Sand	CH	E5-B	0 - 3	--	51/24/27	27	2.56	2	15	36	47	83					F
E6	100,700	Oct-2010	Clay	CL	A	5	14.4	40.2/15.8/24.4	24.4	2.74	0.1	17.7	49.5	32.7	82					F
E7	74,900	Oct-2010	Sandy Clay	CL	A	6	5.7	26.2/16.3/9.9	9.9	--	0.0	30.2	56.1	13.7	70					U
E8	227,300	Oct-2010	Sandy Clay	CL	A	2	7.4	23.0/12.0/11.0	11.0	--	0.0	47.0	36.9	16.1	53					U
		Apr-2012	Gravel with Clay and Sand	GW-GC	E8-B	0 - 4	--	27/16/11	11	2.63	40.0	31.0	18.0	11.0	29	125	11		6.0	B
W1	85,700	Oct-2010	Sandy Clay	CL	A	5	8.8	32.1/14.5/17.6	17.6	--	0.0	40.6	37.6	21.8	59					U
W2	584,500	Oct-2010	Sandy Clay	CL	A	surface	8.5	28.1/13.1/15.0	15.0	--	0.2	41.5	42.5	15.8	58					U
		Apr-2012	Clayey Sand with Gravel	SC	W2-A	0 - 3	--	24/14/10	10	2.62	30	45	15.0	10.0	25				6.9	B
		Apr-2012	Silty Clayey Sand with Gravel	SC-SM	W2-B	0 - 5	--	18/13/5	5	2.63	41	45	9.0	5.0	14	128	9	1.5 x 10 ⁻³	3.5	B
W3	84,800	Oct-2010	Topsoil (Sandy Silty Clay)	CL-ML	A	surface	4.3	20.9/16.2/4.7	4.7	--	0.2	44.2	39.2	16.4	56					Topsoil
W4	90,000	Oct-2010	Topsoil (Sandy Silt)	ML	A	5	5.3	21.9/18.0/3.9	3.9	--	0.0	32.6	54.3	13.1	67					Topsoil
		Apr-2012	Topsoil (Sandy Silty Clay)	CL-ML	W4-B	0 - 4	--	26/19/7	7	2.60	0	38	44	18	62					Topsoil
W5	2,001,160	Apr-2012	Sandy Clay	CL	W5-A	0 - 4	--	27/18/9	9	2.61	1	49	32	18	50				7.0	U
			Clayey Sand with Gravel	SC	W5-B	0 - 4	--	24/15/9	9	2.63	29	44	19	8	27	122	10	1.1 x 10 ⁻³	3.6	B
W6	93,400	Oct-2010	Topsoil (Sandy Silty Clay)	CL-ML	A	surface	3.3	23.1/16.5/6.6	6.6	--	0.0	34.3	51.8	13.9	66					Topsoil
W7	39,500	Oct-2010	Sandy Clay	CL	A	5	8.7	28.0/10.6/17.3	17.3	2.67	0.0	43.8	43.1	13.1	56					U
W8	178,411	Apr-2012	Silty Sand with Gravel	SM	W8-A	0 - 3	--	NP	NP	2.64	35	51	9	5	14	117	13	1.2 x 10 ⁻³	5.0	B
			Silty Sand with Gravel	SM	W8-B	0 - 4	--	NP	NP	2.66	32	40	18	10	28				6.4	B
W9	60,250	Oct-2010	Sandy Clay	CL	A	surface	4.4	25.9/12.3/13.5	13.5	--	0.0	37.4	45.2	17.4	63					U
		Apr-2012	Sandy Clay	CL	W9-B	0 - 4	--	28/16/12	12	2.63	6	44	35	15	50	115	14	4.1 x 10 ⁻⁴	7.7	U

Estimation of Cover Material Properties Used in Model

Soil Group ⁴	Volume (cy)	Total Vol (cy)	Percent of Total Volume	Ave. Max. Dry Density (pcf)	Ave. Specific Gravity	Ave. 15bar Grav. Water Content (%)
Group B	1,728,308	3,596,621	48.1%	123	2.64	5.2
Group U	1,682,013	3,596,621	46.8%	115	2.64	7.3
Group F	186,300	3,596,621	5.2%	105	2.61	13.6
Weighted Ave.				118	2.63	6.7

- Notes:
- Volumes estimated using 2009 topography and assuming a relatively flat bottom surface, except for stockpiles W5, W8 and W9. The volumes for stockpiles W8 and W9 were estimated by comparing the 2011 versus 2009 topography. The volume for stockpile W5 was estimated using a combination of both methods.
 - LL = Liquid Limt, PL = Plastic Limit, PI = Plasticity Index (PI = LL-PL)
 - Gravel = 4.75 mm to 75 mm, Sand = 0.075 mm to 4.75 mm, Fines: Silt = 0 .075 mm to 0.002 mm, Clay = less than 0.002 mm
 - Group B (broadly graded), Group U (uniformly graded), and Group F (fine textured) based on evaluation of gradations and Benson (2012). See Attachment B of EFRI (2012) for gradations and laboratory reports.

References:

Benson, C., 2012. Electronic communication from Craig Benson, University of Wisconsin-Madison, to Melanie Davis, MWH Americas, Inc., regarding evaluation of gradations performed for potential cover soils for White Mesa, May 20.

Energy Fuels Resouces (USA) Inc. (EFRI), 2012. Response to Interrogatories - Round 1 for Reclamation Plan, revision 5.0., March 2012. August 15.

ATTACHMENT C.3
RADON MODEL OUTPUT

-----*****! RADON !*****-----

Version 1.2 - MAY 22, 1989 - G.F. Birchard tel.# (301)492-7000
U.S. Nuclear Regulatory Commission Office of Research

RADON FLUX, CONCENTRATION AND TAILINGS COVER THICKNESS
ARE CALCULATED FOR MULTIPLE LAYERS

OUTPUT FILE: Cell12ts

DESCRIPTION: Cell 2 Cover (topsoil on surface)

CONSTANTS

RADON DECAY CONSTANT	.0000021	s ⁻¹
RADON WATER/AIR PARTITION COEFFICIENT	.26	
DEFAULT SPECIFIC GRAVITY OF COVER & TAILINGS	2.65	

GENERAL INPUT PARAMETERS

LAYERS OF COVER AND TAILINGS	5	
NO LIMIT ON RADON FLUX		
LAYER THICKNESS NOT OPTIMIZED		
DEFAULT SURFACE RADON CONCENTRATION	0	pCi l ⁻¹
SURFACE FLUX PRECISION	.001	pCi m ⁻² s ⁻¹

LAYER INPUT PARAMETERS

LAYER 1 Tailings

THICKNESS	500	cm
POROSITY	.45	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	923	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.2	
CALCULATED SOURCE TERM CONCENTRATION	1.292D-03	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6	%
MOISTURE SATURATION FRACTION	.200	
MEASURED DIFFUSION COEFFICIENT	.0288	cm ² s ⁻¹

LAYER 2 Random Fill

THICKNESS	76	cm
POROSITY	.43	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.234	
MEASURED DIFFUSION COEFFICIENT	.026	cm ² s ⁻¹

LAYER 3 Compacted Random Fill

THICKNESS	122	cm
POROSITY	.32	
MEASURED MASS DENSITY	1.8	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.377	
MEASURED DIFFUSION COEFFICIENT	.016	cm ² s ⁻¹

LAYER 4 ET Cover

THICKNESS	107	cm
POROSITY	.39	
MEASURED MASS DENSITY	1.6	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.275	
MEASURED DIFFUSION COEFFICIENT	.0225	cm ² s ⁻¹

LAYER 5 Topsoil

THICKNESS	15	cm
POROSITY	.38	
MEASURED MASS DENSITY	1.6	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	5.2	%
MOISTURE SATURATION FRACTION	.219	
MEASURED DIFFUSION COEFFICIENT	.0254	cm ² s ⁻¹

DATA SENT TO THE FILE 'RNDATA' ON DRIVE A:

N	F01	CN1	ICOST	CRITJ	ACC
5	-1.000D+00	0.000D+00	0	0.000D+00	1.000D-03

LAYER	DX	D	P	Q	XMS	RHO
1	5.000D+02	2.880D-02	4.500D-01	1.292D-03	2.000D-01	1.500
2	7.600D+01	2.600D-02	4.300D-01	0.000D+00	2.337D-01	1.500
3	1.220D+02	1.600D-02	3.200D-01	0.000D+00	3.769D-01	1.800
4	1.070D+02	2.250D-02	3.900D-01	0.000D+00	2.749D-01	1.600
5	1.500D+01	2.540D-02	3.800D-01	0.000D+00	2.189D-01	1.600

BARE SOURCE FLUX FROM LAYER 1: 6.713D+02 pCi m⁻² s⁻¹

RESULTS OF THE RADON DIFFUSION CALCULATIONS

LAYER	THICKNESS (cm)	EXIT FLUX (pCi m ⁻² s ⁻¹)	EXIT CONC. (pCi l ⁻¹)
1	5.000D+02	2.884D+02	3.461D+05
2	7.600D+01	1.094D+02	2.058D+05
3	1.220D+02	3.505D+01	3.071D+04
4	1.070D+02	2.018D+01	2.963D+03
5	1.500D+01	2.000D+01	0.000D+00

-----*****! RADON !*****-----

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RADON FLUX, CONCENTRATION AND TAILINGS COVER THICKNESS
ARE CALCULATED FOR MULTIPLE LAYERS

OUTPUT FILE: Cell2rm

DESCRIPTION: Cell 2 Cover (rock mulch on surface)

CONSTANTS

RADON DECAY CONSTANT	.0000021	s ⁻¹
RADON WATER/AIR PARTITION COEFFICIENT	.26	
DEFAULT SPECIFIC GRAVITY OF COVER & TAILINGS		2.65

GENERAL INPUT PARAMETERS

LAYERS OF COVER AND TAILINGS	5	
NO LIMIT ON RADON FLUX		
LAYER THICKNESS NOT OPTIMIZED		
DEFAULT SURFACE RADON CONCENTRATION	0	pCi l ⁻¹
SURFACE FLUX PRECISION	.001	pCi m ⁻² s ⁻¹

LAYER INPUT PARAMETERS

LAYER 1 Tailings

THICKNESS	500	cm
POROSITY	.45	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	923	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.2	
CALCULATED SOURCE TERM CONCENTRATION	1.292D-03	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6	%
MOISTURE SATURATION FRACTION	.200	
MEASURED DIFFUSION COEFFICIENT	.0288	cm ² s ⁻¹

LAYER 2 Random Fill

THICKNESS	76	cm
POROSITY	.43	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.234	
MEASURED DIFFUSION COEFFICIENT	.026	cm ² s ⁻¹

LAYER 3 Compacted Random Fill

THICKNESS	122	cm
POROSITY	.32	
MEASURED MASS DENSITY	1.8	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.377	
MEASURED DIFFUSION COEFFICIENT	.016	cm ² s ⁻¹

LAYER 4 ET Cover

THICKNESS	107	cm
POROSITY	.39	
MEASURED MASS DENSITY	1.6	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.275	
MEASURED DIFFUSION COEFFICIENT	.0225	cm ² s ⁻¹

LAYER 5 Rock Mulch

THICKNESS	15	cm
POROSITY	.35	
MEASURED MASS DENSITY	1.7	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	4	%
MOISTURE SATURATION FRACTION	.194	
MEASURED DIFFUSION COEFFICIENT	.0256	cm ² s ⁻¹

DATA SENT TO THE FILE `RNDATA' ON DRIVE A:

N	F01	CN1	ICOST	CRITJ	ACC
5	-1.000D+00	0.000D+00	0	0.000D+00	1.000D-03

LAYER	DX	D	P	Q	XMS	RHO
1	5.000D+02	2.880D-02	4.500D-01	1.292D-03	2.000D-01	1.500
2	7.600D+01	2.600D-02	4.300D-01	0.000D+00	2.337D-01	1.500
3	1.220D+02	1.600D-02	3.200D-01	0.000D+00	3.769D-01	1.800
4	1.070D+02	2.250D-02	3.900D-01	0.000D+00	2.749D-01	1.600
5	1.500D+01	2.560D-02	3.500D-01	0.000D+00	1.943D-01	1.700

BARE SOURCE FLUX FROM LAYER 1: 6.713D+02 pCi m⁻² s⁻¹

RESULTS OF THE RADON DIFFUSION CALCULATIONS

LAYER	THICKNESS (cm)	EXIT FLUX (pCi m ⁻² s ⁻¹)	EXIT CONC. (pCi l ⁻¹)
1	5.000D+02	2.884D+02	3.461D+05
2	7.600D+01	1.094D+02	2.058D+05
3	1.220D+02	3.501D+01	3.077D+04
4	1.070D+02	2.007D+01	3.107D+03
5	1.500D+01	1.988D+01	0.000D+00

-----*****! RADON !*****-----

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RADON FLUX, CONCENTRATION AND TAILINGS COVER THICKNESS
ARE CALCULATED FOR MULTIPLE LAYERS

OUTPUT FILE: Cell13ts

DESCRIPTION: Cell 3 Cover (topsoil on surface)

CONSTANTS

RADON DECAY CONSTANT	.0000021	s ⁻¹
RADON WATER/AIR PARTITION COEFFICIENT	.26	
DEFAULT SPECIFIC GRAVITY OF COVER & TAILINGS		2.65

GENERAL INPUT PARAMETERS

LAYERS OF COVER AND TAILINGS	5	
NO LIMIT ON RADON FLUX		
LAYER THICKNESS NOT OPTIMIZED		
DEFAULT SURFACE RADON CONCENTRATION	0	pCi l ⁻¹
SURFACE FLUX PRECISION	.001	pCi m ⁻² s ⁻¹

LAYER INPUT PARAMETERS

LAYER 1 Tailings

THICKNESS	500	cm
POROSITY	.45	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	758	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.2	
CALCULATED SOURCE TERM CONCENTRATION	1.061D-03	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6	%
MOISTURE SATURATION FRACTION	.200	
MEASURED DIFFUSION COEFFICIENT	.0288	cm ² s ⁻¹

LAYER 2 Random Fill

THICKNESS	76	cm
POROSITY	.43	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.234	
MEASURED DIFFUSION COEFFICIENT	.026	cm ² s ⁻¹

LAYER 3 Compacted Random Fill

THICKNESS	107	cm
POROSITY	.32	
MEASURED MASS DENSITY	1.8	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.377	
MEASURED DIFFUSION COEFFICIENT	.016	cm ² s ⁻¹

LAYER 4 ET Cover

THICKNESS	107	cm
POROSITY	.39	
MEASURED MASS DENSITY	1.6	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.275	
MEASURED DIFFUSION COEFFICIENT	.0225	cm ² s ⁻¹

LAYER 5 Topsoil

THICKNESS	15	cm
POROSITY	.38	
MEASURED MASS DENSITY	1.6	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	5.2	%
MOISTURE SATURATION FRACTION	.219	
MEASURED DIFFUSION COEFFICIENT	.0254	cm ² s ⁻¹

DATA SENT TO THE FILE 'RNDATA' ON DRIVE A:

N	F01	CN1	ICOST	CRITJ	ACC
5	-1.000D+00	0.000D+00	0	0.000D+00	1.000D-03

LAYER	DX	D	P	Q	XMS	RHO
1	5.000D+02	2.880D-02	4.500D-01	1.061D-03	2.000D-01	1.500
2	7.600D+01	2.600D-02	4.300D-01	0.000D+00	2.337D-01	1.500
3	1.070D+02	1.600D-02	3.200D-01	0.000D+00	3.769D-01	1.800
4	1.070D+02	2.250D-02	3.900D-01	0.000D+00	2.749D-01	1.600
5	1.500D+01	2.540D-02	3.800D-01	0.000D+00	2.189D-01	1.600

BARE SOURCE FLUX FROM LAYER 1: 5.513D+02 pCi m⁻² s⁻¹

RESULTS OF THE RADON DIFFUSION CALCULATIONS

LAYER	THICKNESS (cm)	EXIT FLUX (pCi m ⁻² s ⁻¹)	EXIT CONC. (pCi l ⁻¹)
1	5.000D+02	2.374D+02	2.838D+05
2	7.600D+01	9.084D+01	1.681D+05
3	1.070D+02	3.427D+01	3.003D+04
4	1.070D+02	1.974D+01	2.898D+03
5	1.500D+01	1.956D+01	0.000D+00

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RADON FLUX, CONCENTRATION AND TAILINGS COVER THICKNESS
ARE CALCULATED FOR MULTIPLE LAYERS

OUTPUT FILE: Cell13rm

DESCRIPTION: Cell 3 Cover (rock mulch on surface)

CONSTANTS

RADON DECAY CONSTANT	.0000021	s ⁻¹
RADON WATER/AIR PARTITION COEFFICIENT	.26	
DEFAULT SPECIFIC GRAVITY OF COVER & TAILINGS		2.65

GENERAL INPUT PARAMETERS

LAYERS OF COVER AND TAILINGS	5	
NO LIMIT ON RADON FLUX		
LAYER THICKNESS NOT OPTIMIZED		
DEFAULT SURFACE RADON CONCENTRATION	0	pCi l ⁻¹
SURFACE FLUX PRECISION	.001	pCi m ⁻² s ⁻¹

LAYER INPUT PARAMETERS

LAYER 1 Tailings

THICKNESS	500	cm
POROSITY	.45	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	758	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.2	
CALCULATED SOURCE TERM CONCENTRATION	1.061D-03	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6	%
MOISTURE SATURATION FRACTION	.200	
MEASURED DIFFUSION COEFFICIENT	.0288	cm ² s ⁻¹

LAYER 2 Random Fill

THICKNESS	76	cm
POROSITY	.43	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.234	
MEASURED DIFFUSION COEFFICIENT	.026	cm ² s ⁻¹

LAYER 3 Compacted Random Fill

THICKNESS	107	cm
POROSITY	.32	
MEASURED MASS DENSITY	1.8	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.377	
MEASURED DIFFUSION COEFFICIENT	.016	cm ² s ⁻¹

LAYER 4 ET Cover

THICKNESS	107	cm
POROSITY	.39	
MEASURED MASS DENSITY	1.6	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.275	
MEASURED DIFFUSION COEFFICIENT	.0225	cm ² s ⁻¹

LAYER 5 Rock Mulch

THICKNESS	15	cm
POROSITY	.35	
MEASURED MASS DENSITY	1.7	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	4	%
MOISTURE SATURATION FRACTION	.194	
MEASURED DIFFUSION COEFFICIENT	.0256	cm ² s ⁻¹

DATA SENT TO THE FILE `RNDATA' ON DRIVE A:

N	F01	CN1	ICOST	CRITJ	ACC
5	-1.000D+00	0.000D+00	0	0.000D+00	1.000D-03

LAYER	DX	D	P	Q	XMS	RHO
1	5.000D+02	2.880D-02	4.500D-01	1.061D-03	2.000D-01	1.500
2	7.600D+01	2.600D-02	4.300D-01	0.000D+00	2.337D-01	1.500
3	1.070D+02	1.600D-02	3.200D-01	0.000D+00	3.769D-01	1.800
4	1.070D+02	2.250D-02	3.900D-01	0.000D+00	2.749D-01	1.600
5	1.500D+01	2.560D-02	3.500D-01	0.000D+00	1.943D-01	1.700

BARE SOURCE FLUX FROM LAYER 1: 5.513D+02 pCi m⁻² s⁻¹

RESULTS OF THE RADON DIFFUSION CALCULATIONS

LAYER	THICKNESS (cm)	EXIT FLUX (pCi m ⁻² s ⁻¹)	EXIT CONC. (pCi l ⁻¹)
1	5.000D+02	2.374D+02	2.838D+05
2	7.600D+01	9.083D+01	1.681D+05
3	1.070D+02	3.424D+01	3.009D+04
4	1.070D+02	1.962D+01	3.038D+03
5	1.500D+01	1.945D+01	0.000D+00

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RADON FLUX, CONCENTRATION AND TAILINGS COVER THICKNESS
ARE CALCULATED FOR MULTIPLE LAYERS

OUTPUT FILE: Cells4AB

DESCRIPTION: Cells 4A and 4B Cover

CONSTANTS

RADON DECAY CONSTANT	.0000021	s ⁻¹
RADON WATER/AIR PARTITION COEFFICIENT	.26	
DEFAULT SPECIFIC GRAVITY OF COVER & TAILINGS		2.65

GENERAL INPUT PARAMETERS

LAYERS OF COVER AND TAILINGS	5	
NO LIMIT ON RADON FLUX		
LAYER THICKNESS NOT OPTIMIZED		
DEFAULT SURFACE RADON CONCENTRATION	0	pCi l ⁻¹
SURFACE FLUX PRECISION	.001	pCi m ⁻² s ⁻¹

LAYER INPUT PARAMETERS

LAYER 1 Tailings

THICKNESS	500	cm
POROSITY	.45	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	642	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.2	
CALCULATED SOURCE TERM CONCENTRATION	8.988D-04	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6	%
MOISTURE SATURATION FRACTION	.200	
MEASURED DIFFUSION COEFFICIENT	.0288	cm ² s ⁻¹

LAYER 2 Random Fill

THICKNESS	76	cm
POROSITY	.43	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.234	
MEASURED DIFFUSION COEFFICIENT	.026	cm ² s ⁻¹

LAYER 3 Compacted Random Fill

THICKNESS	91	cm
POROSITY	.32	
MEASURED MASS DENSITY	1.8	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.377	
MEASURED DIFFUSION COEFFICIENT	.016	cm ² s ⁻¹

LAYER 4 ET Cover

THICKNESS	107	cm
POROSITY	.39	
MEASURED MASS DENSITY	1.6	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.275	
MEASURED DIFFUSION COEFFICIENT	.0225	cm ² s ⁻¹

LAYER 5 Rock Mulch

THICKNESS	15	cm
POROSITY	.35	
MEASURED MASS DENSITY	1.7	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	4	%
MOISTURE SATURATION FRACTION	.194	

DATA SENT TO THE FILE `RNDATA' ON DRIVE A:

N	F01	CN1	ICOST	CRITJ	ACC
5	-1.000D+00	0.000D+00	0	0.000D+00	1.000D-03

LAYER	DX	D	P	Q	XMS	RHO
1	5.000D+02	2.880D-02	4.500D-01	8.988D-04	2.000D-01	1.500
2	7.600D+01	2.600D-02	4.300D-01	0.000D+00	2.337D-01	1.500
3	9.100D+01	1.600D-02	3.200D-01	0.000D+00	3.769D-01	1.800
4	1.070D+02	2.250D-02	3.900D-01	0.000D+00	2.749D-01	1.600
5	1.500D+01	2.560D-02	3.500D-01	0.000D+00	1.943D-01	1.700

BARE SOURCE FLUX FROM LAYER 1: 4.669D+02 pCi m⁻² s⁻¹

RESULTS OF THE RADON DIFFUSION CALCULATIONS

LAYER	THICKNESS (cm)	EXIT FLUX (pCi m ⁻² s ⁻¹)	EXIT CONC. (pCi l ⁻¹)
1	5.000D+02	2.017D+02	2.398D+05
2	7.600D+01	7.817D+01	1.412D+05
3	9.100D+01	3.498D+01	3.074D+04
4	1.070D+02	2.005D+01	3.104D+03
5	1.500D+01	1.987D+01	0.000D+00

ATTACHMENT C.4

RADON MODEL OUTPUT FOR VARIABLE THICKNESS OF RANDOM FILL

-----*****! RADON !*****-----

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RADON FLUX, CONCENTRATION AND TAILINGS COVER THICKNESS
ARE CALCULATED FOR MULTIPLE LAYERS

OUTPUT FILE: Cell2pt1

DESCRIPTION: Cell 2 Evaluation of Impact of Increased Random Fill
Thickness - Point 1

CONSTANTS

RADON DECAY CONSTANT	.0000021	s ⁻¹
RADON WATER/AIR PARTITION COEFFICIENT	.26	
DEFAULT SPECIFIC GRAVITY OF COVER & TAILINGS		2.65

GENERAL INPUT PARAMETERS

LAYERS OF COVER AND TAILINGS	5	
DEFAULT RADON FLUX LIMIT	20	pCi m ⁻² s ⁻¹
NO. OF THE LAYER TO BE OPTIMIZED	3	
DEFAULT SURFACE RADON CONCENTRATION	0	pCi l ⁻¹
SURFACE FLUX PRECISION	.001	pCi m ⁻² s ⁻¹

LAYER INPUT PARAMETERS

LAYER 1 Tailings

THICKNESS	500	cm
POROSITY	.45	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	923	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.2	
CALCULATED SOURCE TERM CONCENTRATION	1.292D-03	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6	%
MOISTURE SATURATION FRACTION	.200	
MEASURED DIFFUSION COEFFICIENT	.0288	cm ² s ⁻¹

LAYER 2 Random Fill

THICKNESS	76	cm
POROSITY	.43	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	

CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.234	
MEASURED DIFFUSION COEFFICIENT	.026	cm ² s ⁻¹

LAYER 3 Compacted Random Fill

THICKNESS	1	cm
POROSITY	.32	
MEASURED MASS DENSITY	1.8	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.377	
MEASURED DIFFUSION COEFFICIENT	.016	cm ² s ⁻¹

LAYER 4 ET Cover

THICKNESS	107	cm
POROSITY	.39	
MEASURED MASS DENSITY	1.6	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.275	
MEASURED DIFFUSION COEFFICIENT	.0225	cm ² s ⁻¹

LAYER 5 Topsoil

THICKNESS	15	cm
POROSITY	.38	
MEASURED MASS DENSITY	1.6	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	5.2	%
MOISTURE SATURATION FRACTION	.219	
MEASURED DIFFUSION COEFFICIENT	.0254	cm ² s ⁻¹

DATA SENT TO THE FILE `RNDATA' ON DRIVE A:

N	F01	CN1	ICOST	CRITJ	ACC
5	-1.000D+00	0.000D+00	3	2.000D+01	1.000D-03

LAYER	DX	D	P	Q	XMS	RHO
1	5.000D+02	2.880D-02	4.500D-01	1.292D-03	2.000D-01	1.500
2	7.600D+01	2.600D-02	4.300D-01	0.000D+00	2.337D-01	1.500
3	1.000D+00	1.600D-02	3.200D-01	0.000D+00	3.769D-01	1.800
4	1.070D+02	2.250D-02	3.900D-01	0.000D+00	2.749D-01	1.600
5	1.500D+01	2.540D-02	3.800D-01	0.000D+00	2.189D-01	1.600

BARE SOURCE FLUX FROM LAYER 1: 6.713D+02 pCi m⁻² s⁻¹

RESULTS OF THE RADON DIFFUSION CALCULATIONS

LAYER	THICKNESS (cm)	EXIT FLUX (pCi m ⁻² s ⁻¹)	EXIT CONC. (pCi l ⁻¹)
1	5.000D+02	2.884D+02	3.461D+05
2	7.600D+01	1.094D+02	2.058D+05
3	1.219D+02	3.507D+01	3.073D+04
4	1.070D+02	2.020D+01	2.966D+03
5	1.500D+01	2.000D+01	0.000D+00

-----*****! RADON !*****-----

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RADON FLUX, CONCENTRATION AND TAILINGS COVER THICKNESS
ARE CALCULATED FOR MULTIPLE LAYERS

OUTPUT FILE: Cell2pt2

DESCRIPTION: Cell 2 Evaluation of Impact of Increased Random Fill
Thickness - Point 2

CONSTANTS

RADON DECAY CONSTANT	.0000021	s ⁻¹
RADON WATER/AIR PARTITION COEFFICIENT	.26	
DEFAULT SPECIFIC GRAVITY OF COVER & TAILINGS		2.65

GENERAL INPUT PARAMETERS

LAYERS OF COVER AND TAILINGS	5	
DEFAULT RADON FLUX LIMIT	20	pCi m ⁻² s ⁻¹
NO. OF THE LAYER TO BE OPTIMIZED	3	
DEFAULT SURFACE RADON CONCENTRATION	0	pCi l ⁻¹
SURFACE FLUX PRECISION	.001	pCi m ⁻² s ⁻¹

LAYER INPUT PARAMETERS

LAYER 1 Tailings

THICKNESS	500	cm
POROSITY	.45	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	923	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.2	
CALCULATED SOURCE TERM CONCENTRATION	1.292D-03	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6	%
MOISTURE SATURATION FRACTION	.200	
MEASURED DIFFUSION COEFFICIENT	.0288	cm ² s ⁻¹

LAYER 2 Random Fill

THICKNESS	107	cm
POROSITY	.43	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	

CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.234	
MEASURED DIFFUSION COEFFICIENT	.026	cm ² s ⁻¹

LAYER 3 Compacted Random Fill

THICKNESS	1	cm
POROSITY	.32	
MEASURED MASS DENSITY	1.8	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.377	
MEASURED DIFFUSION COEFFICIENT	.016	cm ² s ⁻¹

LAYER 4 ET Cover

THICKNESS	107	cm
POROSITY	.39	
MEASURED MASS DENSITY	1.6	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.275	
MEASURED DIFFUSION COEFFICIENT	.0225	cm ² s ⁻¹

LAYER 5 Topsoil

THICKNESS	15	cm
POROSITY	.38	
MEASURED MASS DENSITY	1.6	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	5.2	%
MOISTURE SATURATION FRACTION	.219	
MEASURED DIFFUSION COEFFICIENT	.0254	cm ² s ⁻¹

DATA SENT TO THE FILE `RNDATA' ON DRIVE A:

N	F01	CN1	ICOST	CRITJ	ACC
5	-1.000D+00	0.000D+00	3	2.000D+01	1.000D-03

LAYER	DX	D	P	Q	XMS	RHO
1	5.000D+02	2.880D-02	4.500D-01	1.292D-03	2.000D-01	1.500
2	1.070D+02	2.600D-02	4.300D-01	0.000D+00	2.337D-01	1.500
3	1.000D+00	1.600D-02	3.200D-01	0.000D+00	3.769D-01	1.800
4	1.070D+02	2.250D-02	3.900D-01	0.000D+00	2.749D-01	1.600
5	1.500D+01	2.540D-02	3.800D-01	0.000D+00	2.189D-01	1.600

BARE SOURCE FLUX FROM LAYER 1: 6.713D+02 pCi m⁻² s⁻¹

RESULTS OF THE RADON DIFFUSION CALCULATIONS

LAYER	THICKNESS (cm)	EXIT FLUX (pCi m ⁻² s ⁻¹)	EXIT CONC. (pCi l ⁻¹)
1	5.000D+02	3.002D+02	3.355D+05
2	1.070D+02	8.457D+01	1.545D+05
3	9.819D+01	3.508D+01	3.075D+04
4	1.070D+02	2.021D+01	2.967D+03
5	1.500D+01	2.000D+01	0.000D+00

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RADON FLUX, CONCENTRATION AND TAILINGS COVER THICKNESS
ARE CALCULATED FOR MULTIPLE LAYERS

OUTPUT FILE: Cell2pt3

DESCRIPTION: Cell 2 Evaluation of Impact of Increased Random Fill
Thickness - Point 3

CONSTANTS

RADON DECAY CONSTANT	.0000021	s ⁻¹
RADON WATER/AIR PARTITION COEFFICIENT	.26	
DEFAULT SPECIFIC GRAVITY OF COVER & TAILINGS		2.65

GENERAL INPUT PARAMETERS

LAYERS OF COVER AND TAILINGS	5	
DEFAULT RADON FLUX LIMIT	20	pCi m ⁻² s ⁻¹
NO. OF THE LAYER TO BE OPTIMIZED	3	
DEFAULT SURFACE RADON CONCENTRATION	0	pCi l ⁻¹
SURFACE FLUX PRECISION	.001	pCi m ⁻² s ⁻¹

LAYER INPUT PARAMETERS

LAYER 1 Tailings

THICKNESS	500	cm
POROSITY	.45	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	923	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.2	
CALCULATED SOURCE TERM CONCENTRATION	1.292D-03	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6	%
MOISTURE SATURATION FRACTION	.200	
MEASURED DIFFUSION COEFFICIENT	.0288	cm ² s ⁻¹

LAYER 2 Random Fill

THICKNESS	152	cm
POROSITY	.43	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	

CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.234	
MEASURED DIFFUSION COEFFICIENT	.026	cm ² s ⁻¹

LAYER 3 Compacted Random Fill

THICKNESS	1	cm
POROSITY	.32	
MEASURED MASS DENSITY	1.8	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.377	
MEASURED DIFFUSION COEFFICIENT	.016	cm ² s ⁻¹

LAYER 4 ET Cover

THICKNESS	107	cm
POROSITY	.39	
MEASURED MASS DENSITY	1.6	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.275	
MEASURED DIFFUSION COEFFICIENT	.0225	cm ² s ⁻¹

LAYER 5 Topsoil

THICKNESS	15	cm
POROSITY	.38	
MEASURED MASS DENSITY	1.6	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	5.2	%
MOISTURE SATURATION FRACTION	.219	
MEASURED DIFFUSION COEFFICIENT	.0254	cm ² s ⁻¹

DATA SENT TO THE FILE `RNDATA' ON DRIVE A:

N	F01	CN1	ICOST	CRITJ	ACC
5	-1.000D+00	0.000D+00	3	2.000D+01	1.000D-03

LAYER	DX	D	P	Q	XMS	RHO
1	5.000D+02	2.880D-02	4.500D-01	1.292D-03	2.000D-01	1.500
2	1.520D+02	2.600D-02	4.300D-01	0.000D+00	2.337D-01	1.500
3	1.000D+00	1.600D-02	3.200D-01	0.000D+00	3.769D-01	1.800
4	1.070D+02	2.250D-02	3.900D-01	0.000D+00	2.749D-01	1.600
5	1.500D+01	2.540D-02	3.800D-01	0.000D+00	2.189D-01	1.600

BARE SOURCE FLUX FROM LAYER 1: 6.713D+02 pCi m⁻² s⁻¹

RESULTS OF THE RADON DIFFUSION CALCULATIONS

LAYER	THICKNESS (cm)	EXIT FLUX (pCi m ⁻² s ⁻¹)	EXIT CONC. (pCi l ⁻¹)
1	5.000D+02	3.089D+02	3.276D+05
2	1.520D+02	5.950D+01	1.003D+05
3	6.418D+01	3.509D+01	3.075D+04
4	1.070D+02	2.021D+01	2.967D+03
5	1.500D+01	2.000D+01	0.000D+00

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RADON FLUX, CONCENTRATION AND TAILINGS COVER THICKNESS
ARE CALCULATED FOR MULTIPLE LAYERS

OUTPUT FILE: Cell2pt4

DESCRIPTION: Cell 2 Evaluation of Impact of Increased Random Fill
Thickness - Point 4

CONSTANTS

RADON DECAY CONSTANT	.0000021	s ⁻¹
RADON WATER/AIR PARTITION COEFFICIENT	.26	
DEFAULT SPECIFIC GRAVITY OF COVER & TAILINGS		2.65

GENERAL INPUT PARAMETERS

LAYERS OF COVER AND TAILINGS	4	
RADON FLUX LIMIT	20	pCi m ⁻² s ⁻¹
NO. OF THE LAYER TO BE OPTIMIZED	2	
DEFAULT SURFACE RADON CONCENTRATION	0	pCi l ⁻¹
SURFACE FLUX PRECISION	.001	pCi m ⁻² s ⁻¹

LAYER INPUT PARAMETERS

LAYER 1 Tailings

THICKNESS	500	cm
POROSITY	.45	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	923	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.2	
CALCULATED SOURCE TERM CONCENTRATION	1.292D-03	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6	%
MOISTURE SATURATION FRACTION	.200	
MEASURED DIFFUSION COEFFICIENT	.0288	cm ² s ⁻¹

LAYER 2 Random Fill

THICKNESS	1	cm
POROSITY	.43	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	

CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.234	
MEASURED DIFFUSION COEFFICIENT	.026	cm ² s ⁻¹

LAYER 3 ET Cover

THICKNESS	107	cm
POROSITY	.39	
MEASURED MASS DENSITY	1.6	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.275	
MEASURED DIFFUSION COEFFICIENT	.0225	cm ² s ⁻¹

LAYER 4 Topsoil

THICKNESS	15	cm
POROSITY	.38	
MEASURED MASS DENSITY	1.6	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	5.2	%
MOISTURE SATURATION FRACTION	.219	
MEASURED DIFFUSION COEFFICIENT	.0254	cm ² s ⁻¹

DATA SENT TO THE FILE `RNDATA' ON DRIVE A:

N	F01	CN1	ICOST	CRITJ	ACC	
4	-1.000D+00	0.000D+00	2	2.000D+01	1.000D-03	

LAYER	DX	D	P	Q	XMS	RHO
1	5.000D+02	2.880D-02	4.500D-01	1.292D-03	2.000D-01	1.500
2	1.000D+00	2.600D-02	4.300D-01	0.000D+00	2.337D-01	1.500
3	1.070D+02	2.250D-02	3.900D-01	0.000D+00	2.749D-01	1.600
4	1.500D+01	2.540D-02	3.800D-01	0.000D+00	2.189D-01	1.600

BARE SOURCE FLUX FROM LAYER 1: 6.713D+02 pCi m⁻² s⁻¹

RESULTS OF THE RADON DIFFUSION CALCULATIONS

LAYER	THICKNESS (cm)	EXIT FLUX (pCi m ⁻² s ⁻¹)	EXIT CONC. (pCi l ⁻¹)
1	5.000D+02	3.145D+02	3.225D+05
2	2.437D+02	3.502D+01	3.520D+04
3	1.070D+02	2.017D+01	2.961D+03
4	1.500D+01	1.998D+01	0.000D+00

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RADON FLUX, CONCENTRATION AND TAILINGS COVER THICKNESS
ARE CALCULATED FOR MULTIPLE LAYERS

OUTPUT FILE: Cell3pt1

DESCRIPTION: Cell 3 Evaluation of Impact of Increased Random Fill
Thickness - Point 1

CONSTANTS

RADON DECAY CONSTANT	.0000021	s ⁻¹
RADON WATER/AIR PARTITION COEFFICIENT	.26	
DEFAULT SPECIFIC GRAVITY OF COVER & TAILINGS		2.65

GENERAL INPUT PARAMETERS

LAYERS OF COVER AND TAILINGS	5	
RADON FLUX LIMIT	20	pCi m ⁻² s ⁻¹
NO. OF THE LAYER TO BE OPTIMIZED	3	
DEFAULT SURFACE RADON CONCENTRATION	0	pCi l ⁻¹
SURFACE FLUX PRECISION	.001	pCi m ⁻² s ⁻¹

LAYER INPUT PARAMETERS

LAYER 1 Tailings

THICKNESS	500	cm
POROSITY	.45	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	758	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.2	
CALCULATED SOURCE TERM CONCENTRATION	1.061D-03	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6	%
MOISTURE SATURATION FRACTION	.200	
MEASURED DIFFUSION COEFFICIENT	.0288	cm ² s ⁻¹

LAYER 2 Random Fill

THICKNESS	76	cm
POROSITY	.43	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	

CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.234	
MEASURED DIFFUSION COEFFICIENT	.026	cm ² s ⁻¹

LAYER 3 Compacted Random Fill

THICKNESS	1	cm
POROSITY	.32	
MEASURED MASS DENSITY	1.8	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.377	
MEASURED DIFFUSION COEFFICIENT	.016	cm ² s ⁻¹

LAYER 4 ET Cover

THICKNESS	107	cm
POROSITY	.39	
MEASURED MASS DENSITY	1.6	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.275	
MEASURED DIFFUSION COEFFICIENT	.0225	cm ² s ⁻¹

LAYER 5 Topsoil

THICKNESS	15	cm
POROSITY	.38	
MEASURED MASS DENSITY	1.6	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	5.2	%
MOISTURE SATURATION FRACTION	.219	
MEASURED DIFFUSION COEFFICIENT	.0254	cm ² s ⁻¹

DATA SENT TO THE FILE `RNDATA' ON DRIVE A:

N	F01	CN1	ICOST	CRITJ	ACC
5	-1.000D+00	0.000D+00	3	2.000D+01	1.000D-03

LAYER	DX	D	P	Q	XMS	RHO
1	5.000D+02	2.880D-02	4.500D-01	1.061D-03	2.000D-01	1.500
2	7.600D+01	2.600D-02	4.300D-01	0.000D+00	2.337D-01	1.500
3	1.000D+00	1.600D-02	3.200D-01	0.000D+00	3.769D-01	1.800
4	1.070D+02	2.250D-02	3.900D-01	0.000D+00	2.749D-01	1.600
5	1.500D+01	2.540D-02	3.800D-01	0.000D+00	2.189D-01	1.600

BARE SOURCE FLUX FROM LAYER 1: 5.513D+02 pCi m⁻² s⁻¹

RESULTS OF THE RADON DIFFUSION CALCULATIONS

LAYER	THICKNESS (cm)	EXIT FLUX (pCi m ⁻² s ⁻¹)	EXIT CONC. (pCi l ⁻¹)
1	5.000D+02	2.375D+02	2.837D+05
2	7.600D+01	9.099D+01	1.679D+05
3	1.050D+02	3.508D+01	3.074D+04
4	1.070D+02	2.020D+01	2.966D+03
5	1.500D+01	2.000D+01	0.000D+00

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RADON FLUX, CONCENTRATION AND TAILINGS COVER THICKNESS
ARE CALCULATED FOR MULTIPLE LAYERS

OUTPUT FILE: Cell3pt2

DESCRIPTION: Cell 3 Evaluation of Impact of Increased Random Fill
Thickness - Point 2

CONSTANTS

RADON DECAY CONSTANT	.0000021	s ⁻¹
RADON WATER/AIR PARTITION COEFFICIENT	.26	
DEFAULT SPECIFIC GRAVITY OF COVER & TAILINGS		2.65

GENERAL INPUT PARAMETERS

LAYERS OF COVER AND TAILINGS	5	
RADON FLUX LIMIT	20	pCi m ⁻² s ⁻¹
NO. OF THE LAYER TO BE OPTIMIZED	3	
DEFAULT SURFACE RADON CONCENTRATION	0	pCi l ⁻¹
SURFACE FLUX PRECISION	.001	pCi m ⁻² s ⁻¹

LAYER INPUT PARAMETERS

LAYER 1 Tailings

THICKNESS	500	cm
POROSITY	.45	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	758	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.2	
CALCULATED SOURCE TERM CONCENTRATION	1.061D-03	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6	%
MOISTURE SATURATION FRACTION	.200	
MEASURED DIFFUSION COEFFICIENT	.0288	cm ² s ⁻¹

LAYER 2 Random Fill

THICKNESS	107	cm
POROSITY	.43	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	

CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.234	
MEASURED DIFFUSION COEFFICIENT	.026	cm ² s ⁻¹

LAYER 3 Compacted Random Fill

THICKNESS	1	cm
POROSITY	.32	
MEASURED MASS DENSITY	1.8	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.377	
MEASURED DIFFUSION COEFFICIENT	.016	cm ² s ⁻¹

LAYER 4 ET Cover

THICKNESS	107	cm
POROSITY	.39	
MEASURED MASS DENSITY	1.6	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.275	
MEASURED DIFFUSION COEFFICIENT	.0225	cm ² s ⁻¹

LAYER 5 Topsoil

THICKNESS	15	cm
POROSITY	.38	
MEASURED MASS DENSITY	1.6	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	5.2	%
MOISTURE SATURATION FRACTION	.219	
MEASURED DIFFUSION COEFFICIENT	.0254	cm ² s ⁻¹

DATA SENT TO THE FILE `RNDATA' ON DRIVE A:

N	F01	CN1	ICOST	CRITJ	ACC
5	-1.000D+00	0.000D+00	3	2.000D+01	1.000D-03

LAYER	DX	D	P	Q	XMS	RHO
1	5.000D+02	2.880D-02	4.500D-01	1.061D-03	2.000D-01	1.500
2	1.070D+02	2.600D-02	4.300D-01	0.000D+00	2.337D-01	1.500
3	1.000D+00	1.600D-02	3.200D-01	0.000D+00	3.769D-01	1.800
4	1.070D+02	2.250D-02	3.900D-01	0.000D+00	2.749D-01	1.600
5	1.500D+01	2.540D-02	3.800D-01	0.000D+00	2.189D-01	1.600

BARE SOURCE FLUX FROM LAYER 1: 5.513D+02 pCi m⁻² s⁻¹

RESULTS OF THE RADON DIFFUSION CALCULATIONS

LAYER	THICKNESS (cm)	EXIT FLUX (pCi m ⁻² s ⁻¹)	EXIT CONC. (pCi l ⁻¹)
1	5.000D+02	2.471D+02	2.750D+05
2	1.070D+02	7.089D+01	1.255D+05
3	8.150D+01	3.507D+01	3.073D+04
4	1.070D+02	2.020D+01	2.966D+03
5	1.500D+01	2.000D+01	0.000D+00

-----*****! RADON !*****-----

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U.S. Nuclear Regulatory Commission Office of Research

RADON FLUX, CONCENTRATION AND TAILINGS COVER THICKNESS
ARE CALCULATED FOR MULTIPLE LAYERS

OUTPUT FILE: Cell3pt3

DESCRIPTION: Cell 3 Evaluation of Impact of Increased Random Fill
Thickness - Point 3

CONSTANTS

RADON DECAY CONSTANT	.0000021	s ⁻¹
RADON WATER/AIR PARTITION COEFFICIENT	.26	
DEFAULT SPECIFIC GRAVITY OF COVER & TAILINGS		2.65

GENERAL INPUT PARAMETERS

LAYERS OF COVER AND TAILINGS	5	
RADON FLUX LIMIT	20	pCi m ⁻² s ⁻¹
NO. OF THE LAYER TO BE OPTIMIZED	3	
DEFAULT SURFACE RADON CONCENTRATION	0	pCi l ⁻¹
SURFACE FLUX PRECISION	.001	pCi m ⁻² s ⁻¹

LAYER INPUT PARAMETERS

LAYER 1 Tailings

THICKNESS	500	cm
POROSITY	.45	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	758	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.2	
CALCULATED SOURCE TERM CONCENTRATION	1.061D-03	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6	%
MOISTURE SATURATION FRACTION	.200	
MEASURED DIFFUSION COEFFICIENT	.0288	cm ² s ⁻¹

LAYER 2 Random Fill

THICKNESS	152	cm
POROSITY	.43	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	

CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.234	
MEASURED DIFFUSION COEFFICIENT	.026	cm ² s ⁻¹

LAYER 3 Compacted Random Fill

THICKNESS	1	cm
POROSITY	.32	
MEASURED MASS DENSITY	1.8	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.377	
MEASURED DIFFUSION COEFFICIENT	.016	cm ² s ⁻¹

LAYER 4 ET Cover

THICKNESS	107	cm
POROSITY	.39	
MEASURED MASS DENSITY	1.6	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.275	
MEASURED DIFFUSION COEFFICIENT	.0225	cm ² s ⁻¹

LAYER 5 Topsoil

THICKNESS	15	cm
POROSITY	.38	
MEASURED MASS DENSITY	1.6	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	5.2	%
MOISTURE SATURATION FRACTION	.219	
MEASURED DIFFUSION COEFFICIENT	.0254	cm ² s ⁻¹

DATA SENT TO THE FILE `RNDATA' ON DRIVE A:

N	F01	CN1	ICOST	CRITJ	ACC
5	-1.000D+00	0.000D+00	3	2.000D+01	1.000D-03

LAYER	DX	D	P	Q	XMS	RHO
1	5.000D+02	2.880D-02	4.500D-01	1.061D-03	2.000D-01	1.500
2	1.520D+02	2.600D-02	4.300D-01	0.000D+00	2.337D-01	1.500
3	1.000D+00	1.600D-02	3.200D-01	0.000D+00	3.769D-01	1.800
4	1.070D+02	2.250D-02	3.900D-01	0.000D+00	2.749D-01	1.600
5	1.500D+01	2.540D-02	3.800D-01	0.000D+00	2.189D-01	1.600

BARE SOURCE FLUX FROM LAYER 1: 5.513D+02 pCi m⁻² s⁻¹

RESULTS OF THE RADON DIFFUSION CALCULATIONS

LAYER	THICKNESS (cm)	EXIT FLUX (pCi m ⁻² s ⁻¹)	EXIT CONC. (pCi l ⁻¹)
1	5.000D+02	2.543D+02	2.685D+05
2	1.520D+02	5.094D+01	8.036D+04
3	4.798D+01	3.509D+01	3.075D+04
4	1.070D+02	2.021D+01	2.967D+03
5	1.500D+01	2.000D+01	0.000D+00

-----*****! RADON !*****-----

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U.S. Nuclear Regulatory Commission Office of Research

RADON FLUX, CONCENTRATION AND TAILINGS COVER THICKNESS
ARE CALCULATED FOR MULTIPLE LAYERS

OUTPUT FILE: Cell3pt4

DESCRIPTION: Cell 3 Evaluation of Impact of Increased Random Fill
Thickness - Point 4

CONSTANTS

RADON DECAY CONSTANT	.0000021	s ⁻¹
RADON WATER/AIR PARTITION COEFFICIENT	.26	
DEFAULT SPECIFIC GRAVITY OF COVER & TAILINGS		2.65

GENERAL INPUT PARAMETERS

LAYERS OF COVER AND TAILINGS	4	
RADON FLUX LIMIT	20	pCi m ⁻² s ⁻¹
NO. OF THE LAYER TO BE OPTIMIZED	2	
DEFAULT SURFACE RADON CONCENTRATION	0	pCi l ⁻¹
SURFACE FLUX PRECISION	.001	pCi m ⁻² s ⁻¹

LAYER INPUT PARAMETERS

LAYER 1 Tailings

THICKNESS	500	cm
POROSITY	.45	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	758	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.2	
CALCULATED SOURCE TERM CONCENTRATION	1.061D-03	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6	%
MOISTURE SATURATION FRACTION	.200	
MEASURED DIFFUSION COEFFICIENT	.0288	cm ² s ⁻¹

LAYER 2 Random Fill

THICKNESS	1	cm
POROSITY	.43	
MEASURED MASS DENSITY	1.5	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	

CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.234	
MEASURED DIFFUSION COEFFICIENT	.026	cm ² s ⁻¹

LAYER 3 ET Cover

THICKNESS	107	cm
POROSITY	.39	
MEASURED MASS DENSITY	1.6	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	6.7	%
MOISTURE SATURATION FRACTION	.275	
MEASURED DIFFUSION COEFFICIENT	.0225	cm ² s ⁻¹

LAYER 4 Topsoil

THICKNESS	15	cm
POROSITY	.38	
MEASURED MASS DENSITY	1.6	g cm ⁻³
MEASURED RADIUM ACTIVITY	0	pCi/g ⁻¹
MEASURED EMANATION COEFFICIENT	.35	
CALCULATED SOURCE TERM CONCENTRATION	0.000D+00	pCi cm ⁻³ s ⁻¹
WEIGHT % MOISTURE	5.2	%
MOISTURE SATURATION FRACTION	.219	
MEASURED DIFFUSION COEFFICIENT	.0254	cm ² s ⁻¹

DATA SENT TO THE FILE `RNDATA' ON DRIVE A:

N	F01	CN1	ICOST	CRITJ	ACC	
4	-1.000D+00	0.000D+00	2	2.000D+01	1.000D-03	

LAYER	DX	D	P	Q	XMS	RHO
1	5.000D+02	2.880D-02	4.500D-01	1.061D-03	2.000D-01	1.500
2	1.000D+00	2.600D-02	4.300D-01	0.000D+00	2.337D-01	1.500
3	1.070D+02	2.250D-02	3.900D-01	0.000D+00	2.749D-01	1.600
4	1.500D+01	2.540D-02	3.800D-01	0.000D+00	2.189D-01	1.600

BARE SOURCE FLUX FROM LAYER 1: 5.513D+02 pCi m⁻² s⁻¹

RESULTS OF THE RADON DIFFUSION CALCULATIONS

LAYER	THICKNESS (cm)	EXIT FLUX (pCi m ⁻² s ⁻¹)	EXIT CONC. (pCi l ⁻¹)
1	5.000D+02	2.583D+02	2.649D+05
2	2.217D+02	3.506D+01	3.523D+04
3	1.070D+02	2.019D+01	2.964D+03
4	1.500D+01	2.000D+01	0.000D+00

ATTACHMENT I

SUPPORTING DOCUMENTATION FOR INTERROGATORY 16/1:

REVISED RADIATION PROTECTION MANUAL

Responsible Authority

Radiation Safety Officer

The Radiation Safety Officer (RSO) shall meet the requirements as specified in section 2.4, Technical Qualifications of Health Physics Staff in NRC Regulatory Guide 8.31. Along with meeting the requirements outline in Regulatory Guide 8.31, the RSO must also be submitted and approved by the State of Utah as an acceptable responsible authority for reclamation activities.

The RSO will be responsible for following and complying with all rules and specifications that are outlined in the Reclamation Plan along with all standards pertaining to the health and safety of the employees and environment. The RSO must also maintain accurate documentation of all decontamination and disposal activities. The RSO will have the responsibility of overseeing all aspects of this procedure and all total releases of any materials from the facility. These records will be maintained on site for review.

1.0 RADIATION MONITORING – PERSONNEL

This section contains the following procedures for personnel radiation monitoring including: (1) airborne particulates (2) alpha surveys (3) beta/gamma surveys and (4) urinalysis surveys.

1.1 AIRBORNE PARTICULATES

Sampling for personnel exposure to airborne particulate radionuclides, other than for radon progeny, will be done utilizing two distinct sampling protocols: (1) personnel breathing zone samplers, and (2) ambient air high volume samplers. Specific standard operating procedures for these two collection methods are described in Section 1.1.2 and 1.1.3 below.

1.1.1 Frequency

For work where there is the potential to cause airborne radiation doses to site personnel, the frequency and type of air sampling to be conducted is determined from measured air concentrations:

0.01 DAC – 0.1 DAC	Quarterly or monthly area air sampling and/or bioassay measurements
> 0.1 DAC	Continuous sampling is appropriate if concentrations are likely to exceed 0.10 DAC averaged over 40 hours or longer.

The RSO will determine the exact frequency of area air sampling, breathing zone sampling and/or bioassay measurements and determine how many workers in a group of workers performing similar jobs are to be equipped with breathing zone air samplers. Higher airborne concentrations warrant more frequent use of area air samplers, bioassay measurements, and breathing zone air samplers. Area air samplers may be used where documentation exists showing the sample is equivalent to a breathing zone sample. Breathing zone samples taken within one foot of the worker's head are considered representative without further documentation. Breathing zone air samplers are preferred under work conditions of higher airborne concentrations. Table 1.1.1-1 below, from Regulatory Guide 8.25, provides additional guidance for the RSO in designing and implementing air sampling programs for specific jobs.

Table 1.1.1-1
Air Sampling Recommendations Based on Estimated Intakes and Airborne Concentrations

Worker's Estimated Annual Intake as a Fraction of ALI	Estimated Airborne Concentrations as a Fraction of DAC	Air Sampling Recommendations
< 0.1	< 0.01	Air sampling is generally not necessary. However, monthly or quarterly grab samples or some other measurement may be appropriate to confirm that airborne levels are indeed low.
	> 0.01	Some air sampling is appropriate. Intermittent or grab samples are appropriate near the lower end of the range. Continuous sampling is appropriate if concentrations are likely to exceed 0.1 DAC averaged over 40 hours or longer.
> 0.1	< 0.3	Monitoring of intake by air sampling or bioassay is required by 10 CFR 20.1502(b).
	> 0.3	A demonstration that the air samples are representative of the breathing zone is appropriate if (1) intakes of record will be based on air sampling and (2) concentrations are likely to exceed 0.3 DAC averaged over 40 hours (i.e., intake more than 12 DAC-hours in a week).
Any annual intake	> 1	Air samples should be analyzed before work resumes the next day when potential intakes may exceed 40 DAC-hours in 1 week. When work is done in shifts, results should be available before the next shift ends. (Credit may be taken for protection factors if a respiratory protection program is in place.)
	> 5	Continuous air monitoring should be provided if there is a potential for intakes to exceed 40 DAC-hours in 1 day. (Credit may be taken for protection factors if a respiratory protection program is in place.)

1.1.2 Breathing Zone Sampling

1.1.2.1 General

Breathing zone samplers (SKC pumps and accessory kits, or equivalent) are used to determine airborne exposure to uranium while individuals are performing specific jobs. The units consist of a portable low volume pump that attaches to the individuals belt, tygon tubing and filter holder that is attached to the individual's lapel or shirt collar. The unit monitors airborne uranium in a person's breathing zone. Pumps must be recharged after 6 to 8 hours of use.

1.1.2.2 Applicability

Breathing zone samples are required:

- for all calciner activities,
- at least quarterly during routine tasks on representative individuals performing these tasks,
- when radiation work permits are issued in which airborne concentrations may exceed 25% of 10 CFR Part 20 limits, or
- at the discretion of the RSO.

1.1.2.3 Procedure

The procedure for collecting a breathing zone sample is as follows:

1. Secure the breathing zone sampler, which has been charged and loaded with a filter paper from the radiation department.
2. Secure the pump to the worker's belt and the filter holder to the shirt collar or lapel. Try to secure pump tubing to minimize restriction of motion.
3. Turn pump on (record the time pump was turned on) and continue monitoring until the work being monitored is completed and the worker no longer is in the exposure area. Record the time at which the job is complete.
4. Return the pump and accessories to the RSO, who will remove the filter paper for analysis. Be sure to indicate accurately the total time taken by the work being monitored.
5. Analysis of filter samples will be performed using a sensitive alpha detector. The procedure is as follows: (a) count a background sample for ten minutes; (b) divide the background count by ten to obtain the background count rate in cpm; (c) Place the breathing zone sample in the instrument and count the sample again for ten minutes;

- (d) divide the sample count by ten to obtain the count rate in cpm; (e) subtract the background count rate from the sample count rate; and, (f) record all data on the Breathing Zone sampling analysis form (a copy of which is attached).
6. Record the total hours of exposure that are being assigned to the employee on the Employee Exposure form, which is maintained in personnel folders. Be sure to consider protection factors permitted by respirator use if the employee was also wearing respiratory protection during the job.
 7. The number of DAC hours assigned is calculated using the following formula:

$$\text{DAC hours of exposure} = \frac{\text{Measured air concentration}}{(\text{DAC})(\text{PF})} \times \text{Total hours of exposure}$$

where: DAC = Derived Air Concentration (for uranium; 10 CFR Part 20, Appendix B)

PF = protection factor for respirator use. If no respiratory protection was used PF =1.

The measured air concentration must be in $\mu\text{Ci/cc}$.

1.1.2.4 Calibration

Prior to use, calibration of the breathing zone samplers will be done using a calibration method as described in Section 3.2.

1.1.2.5 Equipment – Breathing Zone Sampler

The equipment used for breathing zone samples consists of:

1. Personal sampling pumps
2. Gelman 37 mm Delrin filter holders, or equivalent
3. Gelman 37 mm type A/E glass fiber filters, or equivalent
4. Kurz Model 543 air mass flow meter, or equivalent

1.1.2.6 Data Record

Data maintained on file includes:

1. Time on and off for each sample pump.
2. Sampling location(s).
3. Individual's name, identification number, etc.
4. Date and sample number.

5. Sample count rate.

1.1.2.7 Calculations

The airborne concentration in $\mu\text{Ci/cc}$ is equal to the sample count rate minus the background count rate in cpm divided by the instrument alpha efficiency, the sample flow rate in cc/minute, the sample time in minutes and a conversion factor converting dpm to μCi .

The calculation is:

Equation Number 1:

$$\text{Airborne concentration} = \frac{(\text{Count Rate})}{(\text{Time})(\text{eff})(\text{Conversion factor})(\text{Flow Rate})}$$

$$\text{i.e. } \frac{\mu\text{Ci}}{\text{cc}} = \frac{(\text{cpm}-\text{Bkg})}{(\text{eff})(2.22 \times 10^6 \text{ dpm})} \frac{1 \mu\text{Ci}}{(\text{cc/min})(\text{min})} \frac{(1)}{(1)}$$

where: eff = cpm/dpm for counting instruments
cpm = counts/min
dpm = disintegrations/min
Conversion factor 1 $\mu\text{Ci} = 2.22 \times 10^6$ dpm
Flow Rate = cc/min
Collection time = min

Once the airborne concentration has been calculated it is possible to calculate personnel exposure in microcuries (μCi). Personnel exposure is determined for an individual who is working in an area at a known air concentration ($\mu\text{Ci/cc}$) for a given amount of time (hours) breathing the area air at an assumed rate. The breathing rate for a standard person (Handbook of Radiological Health) is 1.20 cubic meters per hour (m^3/hr).

The calculation for personnel exposure is:

Equation Number 2:

$$\text{Exposure } \mu\text{Ci} = (\mu\text{Ci/cc})(1.20 \text{ m}^3/\text{hr})(\text{hours of exposure})(\text{conversion rate})$$

Where: $\mu\text{Ci/cc}$ = air concentration from Equation 1

1.20 m^3/hr = breathing rate for standard man (ICRP)
hours of exposure = hours
conversion factor = 10^6 cc/m^3

It is also possible to determine the percent or fraction of the Derived Air Concentration (DAC) for a particular radionuclide using the information obtained from the exposure calculation and dividing this value by the regulatory limit DAC listed in 10 CFR Part 20.

$$\% \text{ DAC} = \text{Exposure in } \mu\text{Ci} / \mu\text{Ci limit 10 CFR Part 20}$$

For the natural uranium (U-Nat) the DAC limits from 10 CFR Part 20 for insoluble Class Y compounds are as follows:

- Weekly $1.0 \times 10^{-3} \mu\text{Ci /week}$
- Quarterly $1.25 \times 10^{-2} \mu\text{Ci /Qt}$
- Yearly $5.0 \times 10^{-2} \mu\text{Ci /yr}$

1.1.2.8 ALARA/Quality Control

The RSO reviews each monitored result and initiates action if levels exceed 25% of 10 CFR 20 limits. At a minimum, ten percent (10%) of the air samples collected in a given quarter will be recounted using the same instrument or using a different instrument and these results will be compared to the original sample results. Deviations exceeding 30% of the original sample results will be reviewed by the RSO and the samples will be recounted again until the sample results are determined to be consistent. Additional QA samples consisting of spiked air samples, duplicate samples and blank samples will be submitted to the radiation department for counting. This will be based on ten percent (10%) of the number of samples collected during a quarter. The sample results will be compared to the spiked values, duplicate values, or blank (background) values of the prepared sample. Deviations exceeding 30% of the determined spiked, duplicate or blank value will be recounted. If no resolution of the deviation exceeding 30% is made the QA samples preparation will be repeated. Periodic reviews by the RSO and the ALARA audit committee will be made and documented to ensure quality maintenance and ALARA control.

1.1.3 Airborne High Volume Sampling

Grab air sampling involves passing a representative sample of air through a filter paper disc via an air pump for the purpose of determining the concentration of uranium in breathing air at that location. Although the process is only measuring airborne concentrations at a specific place and at a specific time, the results can often be used to represent average concentration in a general area. A high volume sample pump will be used for this purpose. Samples will be analyzed as per standard gross alpha analysis procedures using a sensitive alpha detector.

1.1.3.1 Frequency and Locations

The following principles used for the collection of area grab samples must be considered when collecting a sample in order to obtain a representative air concentration that workers may be exposed to during their assigned work tasks.

1. The locations selected for sampling should be representative of exposures to employees working in the area.
2. For special air sampling, the sampling period should represent the conditions during the entire period of exposure. This may involve sampling during the entire exposure period.
3. For routine sampling, the sampling period must be sufficient to ensure a minimum flow rate of 40 liters per minute (lpm) for at least 60 minutes.
4. Sample filters will be analyzed for gross alpha using a sensitive alpha detector.
5. Grab sampling procedures may be supplemented by use of Breathing Zone Samples for special jobs or non-routine situations.

1.1.3.2 Sampling Equipment

Monitoring equipment will be capable of obtaining an air sample flow rate of at least 40 liters per minute for one hour or longer. Equipment utilized will be an Eberline RAS-1, or a Scientific Industries Model H25004, or equivalent. Filter media will be of appropriate micron pore diameter. Equipment is calibrated prior to each usage as per Section 3.3 of this manual.

1.1.3.3 Sampling Procedure

Steps for collection of area airborne grab samples are as follows:

1. A high volume pump will be used for sample collection.
2. Check sample pump calibration.
3. Locate sampler at designated site. Insert a clean filter, using tweezers, into the filter holder on the sampler. Do not contaminate the filter. Log start time and conditions at the site.
4. Collect a sample for a minimum of 60 minutes at a flow rate of 40 lpm.
5. After sampling is completed, carefully remove the filter, using tweezers, from the filter holder and place it in a clean envelope, or in the plastic casing furnished with the filter.

6. Log all sample data on the log sheet.
 - A. Sample location and number (also on the envelope).
 - B. Time on, time off and date.
 - C. Mill operating conditions at the site.
 - D. Sampler's initials.
7. Analyze for gross alpha

1.1.3.4 *Calculations*

Perform calculations as described in Section 1.1.2.7.

1.1.3.5 *Records*

Logs of all samples taken are filed in the RSO's files. Data are used to calculate radiation exposures as described in Section 4.0.

Whenever grab sampling results indicate that concentrations in work locations exceed 25% of the applicable value in 10 CFR Part 20, Appendix B, time weighted exposures of employees who have worked at these locations shall be computed. Calculations will reveal an individual's exposure in DAC hours. This value shall be assigned to the worker and logged onto the worker's "Employee Exposure to Airborne Radionuclides" form. This form is in Section 4. Whenever special air sampling programs (as required for cleanup, maintenance, decontamination incidents, etc.) reveal that an employee has been exposed to airborne radioactive material, the calculated value shall also be entered on the individual's exposure form.

1.1.3.6 *Quality Assurance*

Calibration checks on each air sampler, prior to field use, ensure accurate airflow volumes. Use of tweezers and new filter storage containers minimizes contamination potential. Field logging of data during sampling and logging of identifying data on sampled filter containers minimizes sample transposition. Quality control samples will be analyzed as described in Section 1.1.2.8

Review of data by the RSO and by the ALARA Audit committee further assures quality maintenance.

1.2 ALPHA SURVEYS

1.2.1 *Restricted Area*

The Restricted Area is defined as:

1. The property area within the chain link fence surrounding the mill property and the area enclosed to the north and east of the facility by the posted Restricted Area fence.
2. The active tailings and liquid waste disposal areas.

All personnel who enter the Restricted Area will monitor themselves each time they leave the Restricted Area and at the end of their shift. The Radiation Safety Department will review the monitoring information. All personnel exiting the Restricted Area must initial a record of their monitoring activity.

1.2.2 Instrumentation

The instrumentation utilized for personnel alpha scanning is listed in Appendix 1 at the end of this manual. Personnel alpha survey instruments are located at the exits from the Restricted Area.

1.2.3 Monitoring Procedures

The monitoring procedure includes the following steps:

1. The alarm rate meter is adjusted within the range of 750 to 1,000 dpm/100 cm² to ensure a margin of 250 dpm/100 cm² due to the low efficiency of this instrumentation.
2. An individual monitors himself by slowly passing the detector over their hands, clothing and shoes, including the shoe bottoms, at a distance from the surface of approximately ¼ inch. An area that is suspected of possessing any contamination (i.e. hands, boots, visible spotting/stain on clothing etc.) should be carefully monitored by placing the detector directly on the surface and note the measurement.
3. Should an alarm be set off indicating the presence of contamination, the individual should:
 - a. Resurvey themselves to verify the contamination.
 - b. If contamination is present the individual must wash the affected area and again resurvey themselves to ensure the contamination has been removed.
4. If the decontamination efforts by the individual are not successful, then the Radiation Safety personnel will be contacted to assess the situation. Further decontamination may be required.
5. If an individual's clothing cannot be successfully decontaminated, they must obtain clothing from the warehouse to use and must launder the personal clothing in the laundry room.

6. Individual surveys are to be logged and initialed.
7. Access to and from the Mill's Restricted Area by all Mill workers, contractors and delivery personnel, other than Radiation, Safety and Environmental Staff, Senior Laboratory personnel, Mill Management and Mill Supervisory personnel and others as may be designated by the RSO, will be limited to one or more access points as may be designated by the RSO from time to time.
8. A Radiation Technician will be positioned at each access point designated by the RSO under paragraph 7 above during peak transition times, such as during breaks and at the ends of shifts, to observe that each worker, contractor or delivery person is performing a proper scan.

1.2.4 Training

All employees will be trained on the proper scanning procedures and techniques.

1.2.5 Records

Log sheets will be collected daily and filed by the Radiation staff. Records will be retained at the Mill. Contamination incidents will result in a written record, which is maintained on file.

1.2.6 Limits/ALARA

Contamination limits for personnel scans are set at 1,000 dpm/100 cm². Records will be reviewed by the RSO to maintain levels noted as low as reasonable achievable.

1.2.7 Quality Assurance

A random check of an individual's scanning technique provides quality assurance of the monitoring procedures. Daily function checks using calibrated sources assures instrumentation performance. Periodic review by the RSO and the ALARA audit committee document and ensure quality control and ALARA maintenance.

1.3 PERSONNEL BETA-GAMMA MONITORING

Site employees working within the Restricted Area will be required to wear a personal monitoring device (such as a TLD, LUXEL badge or other NVLAP approved device which has been approved by the RSO and the SERP) during their work period. The personal monitoring devices are normally issued to each employee quarterly; however, during pregnancy or if the radiological potential for exposure to an individual is

anticipated to be elevated and requires quick assessment the badges may be issued monthly.

1.3.1 Monitoring Procedures

The monitoring procedures consist of:

1. Personnel issued personal monitoring devices will wear the device on the trunk (torso) of the body. The personal monitoring device records beta/gamma radiation as well as other forms of penetrating radiation such as x-rays. A personal monitoring device is an exposure record of an individual's personal exposure to radiation while on the job. Therefore, personal monitoring devices are to remain at the Mill and stored on the assigned dosimeter storage boards. All exposure records obtained by a personal monitoring device which are not consistent with the exposure rates of work tasks or work location measurements made throughout the Mill will be evaluated by the RSO. This evaluation will result in an investigation by the RSO and a written explanation of the findings. These written records will be maintained at the Mill.
2. Personal monitoring devices will be issued at a minimum quarterly and will be exchanged by the Radiation Safety Department. Missing or lost badges will be reported to management.
3. Female employees that become pregnant and continue to work during the course of their pregnancy will be placed on a monthly personal monitoring device exchange during this period. NRC Regulation Guide 8.13 provides guidelines to be followed during pregnancy and is made part of this procedure.

1.3.2 Records

The Radiation Safety Department will maintain all occupational exposure records in the departmental files:

1. Occupational exposure records are a part of an individual's health record and, as such, will be considered private information.
2. An individual may examine his/her exposure record upon request.
3. An employee terminating his/her employment with the Company may request a copy of his/her occupational exposure records.
4. The Radiation Safety Department on the signature of the employee will request prior occupational exposure records.

5. Occupational exposure records will be made available to authorized company or regulatory personnel.

1.3.3 Quality Assurance

Periodic reviews by the RSO and the ALARA audit committee document and ensure quality control and maintenance of conditions ALARA.

1.4 URINALYSIS SURVEYS

1.4.1 Frequency

Urinalyses will be performed on those employees that are a) exposed to potential airborne yellowcake or involved in maintenance tasks during which yellowcake dust may be produced, or b) routinely exposed to airborne uranium dust. Baseline urinalyses will be performed prior to initial work assignments.

Urine samples are collected on a routine basis from employees as required in Regulatory Guide 8.22. Samples will be collected from all employees monthly. Bi-weekly samples will be collected if individual exposures are expected to exceed 25% of the DAC value. Non-routine urinalyses will usually be performed on employees who have been working on assignments that require a Radiation Work Permit, and always on any individual that may have been exposed to airborne uranium or ore dust concentrations that exceed the 25% of the DAC level.

1.4.2 Specimen Collection

Clean, disposable sample cups with lids will be provided to each employee that will be required to submit a urine specimen. The containers will be picked up at the administration building before the individual enters the Restricted Area.

The container, filled with specimen, will be returned to the bioassay laboratory prior to reporting to work. The name of the employee and the date of collection will be indicated on the specimen cup.

A valid sample must be collected at least 40 hours, but not more than 96 hours, after the most recent occupancy of the employee's work area (after two days, but not more than four days off).

The specimen should be collected prior to reporting to the individual's work location. To prevent contamination, the hands should be carefully washed prior to voiding.

Under unusual circumstances where specimens cannot be collected in this manner, the worker will shower immediately prior to voiding.

1.4.3 Sample Preparation

Equipment required:

- 15 ml disposable centrifuge tubes with lids
- 10 ml pipette
- 1 mL pipette
- 200 µL pipette
- 5 µl pipette
- 10 µl pipette
- Disposable tips for the above pipettes
- 1,000 ppm uranium solution
- Spiking solution – 0.03 or 0.02 g/l of uranium in de-ionized water

After the specimens are received, they will be stored in a refrigerator until they are prepared for analysis.

Sample preparation will be done in an area decontaminated to less than 25 dpm alpha (removable) per 100 cm² prior to preparation of samples. All of the equipment that is used in sample preparation will be clean and maintained in such condition.

A log will be prepared and the following information will be kept for each urinalysis performed:

- Sample identification number
- Name of employee submitting the specimen
- Date of sample collection
- Date the sample was sent to the laboratory
- Date the results were received
- Results of the urinalysis in µg/l
- Indication of any spike used in µg/l

The centrifuge tubes will be marked with a sample identification number. 10 milliliters of urine will then be pipetted into the centrifuge tube using the pipette device. Or 1 milliliters of urine will then be pipette into the centrifuge tube using the pipette device (To prevent contamination, a new tip must be used for each specimen.) After each step of the procedure, the proper entry must be made in the logbook.

The samples that are to be spiked for quality assurance purposes will then be prepared. The spikes will be introduced into the sample with 5 µl or 10 µl pipettes. A new tip must be used with each spike. With the standard spike solution (0.03 g/l of U), a 5 µl spike will result in a 15 µg/l concentration for the 10 ml sample; the 10 µl spike will give 30 µg/l). The proper entry must be made in the logbook for each sample spiked.

After preparation has been completed, the QA samples are securely packaged as soon as practicable and sent to the contract laboratory for analysis.

The samples that are to be analyzed in-house will be placed in the chemistry laboratory's refrigerator until the analysis can be completed. A copy of the in-house analytical procedure is described in Section 1.4.7.6. Once the on-site laboratory is no longer functional, all samples will be submitted to a certified laboratory.

1.4.4 Quality Assurance

To assure reliability and reproducibility of results, at least 25% of the samples that are submitted for analysis will be used for quality assurance purposes. These samples will consist of spikes, duplicates, and blanks (samples collected from individuals known to have no lung or systemic uranium burden).

Spiked samples will be prepared as stated under sample preparation of this procedure.

Duplicates will be identical samples of the same specimen and/or spikes of identical concentrations.

To assure reliability of the in-house analytical procedure, 10% of the samples will be sent to a contractor laboratory for analysis. These samples will contain quality assurance items designed to provide intra-laboratory comparisons.

1.4.5 Analysis

After the samples are collected as outlined in Guide 8.22, they are identified to the lab by collection date and number. Urinalysis results must be completed and reported to the Radiation Safety Department within seven days of the sample collection.

1.4.5.1 Equipment List

1. Specimen collection cups with disposable lids (VWR No. 15708-711 or equivalent)
2. Screw cap, disposable, graduated 15 ml centrifuge tubes (Corning No. 25310 or equivalent)
3. Micro-pipettes 1 each 5, 5 each 10 μ L (Oxford Model 7000 or equivalent)
4. Adjustable Finnpiptette each 1,000 μ L, 200 μ L and 5 mL
5. Disposable micro-pipette tips for micro-pipettes (Oxford No. 910A or equivalent)
6. Fume Hood
7. Ultrasonic Cleaner
8. PE-SCIEX ELAN DRC II AXIAL FIELD TECHNOLOGY ICP-MS (or equivalent)
9. Polyscience Water Circulator (or equivalent)
10. Perkin-Elmer AS-10 Auto Sampler (or equivalent)

11. Thermo Scientific Vortex mixtures (or equivalent)

1.4.5.2 Reagent List

1. 1% to 2% Nitric Acid
2. Concentrated Nitric Acid
3. 1,000 µg/ml Uranium Stock Solution, certified vendor prepared
4. Dilutions of the above stock solution, replaced bi-annually. Used for QA/QC.
5. Appropriate Cleaning Solution for Ultrasonic Cleaner
6. 1,000 µg/ml Uranium Stock Solution, purchased from certified vendor to use as calibration standard at different dilutions

Ensure that all reagents used are within their expiration dates listed on each reagent package, if applicable.

1.4.5.3 Premise

A portion of urine is diluted with 2% Nitric acid solution, mixed thoroughly and analyzed.

1.4.5.4 Safety Precautions

- 1 Follow laboratory guidelines when working with acids.
- 2 Utilize all appropriate PPE.

1.4.5.5 Sample Preparation Procedure

1. Compare sample numbering with bioassay result sheet to insure order and eliminate discrepancies.
2. To 15 ml centrifuge tube add 1 mL urine sample, 200 µL internal standard of 1,000 ppb and 2% Nitric acid to make up volume to 10 mL.
3. Maintaining sample order of left to right, front to back, lowest sample number to highest sample number in the set.
4. Use vortex to mix it thoroughly.
5. Analyze using procedure on the ICP-MS described in section 1.4.5.6.

1.4.5.6 ICP-MS Procedures

Special considerations: Because of the high salt content of the samples, it is necessary to clean the skimmer and sampler cones after each use.

1. Turn the argon on at the tank and set the delivery pressure at 80 pounds per square inch (psi).
2. Turn on the exhaust fan and the water supply to the ICP-MS. The water supply has to have a delivery pressure of 70 psi. It may be necessary to change the filters on the water supply in order to achieve sufficient water supply pressure. The ICP-MS will not operate below this pressure.
3. Turn on the computer, monitor and printer.
4. On the windows desktop, double-click the ELAN icon.
5. Check the condition of the sample introduction system.
6. Check that the sample tubing and drain tubing leading from the peristaltic pump to the spray chamber are properly set up and in good working condition. It is recommended to use new tubes every day.
7. Place the capillary tubing into a container of 2% Nitric acid solution.
8. Open the instrument window, and then click the Front Panel Tab.
9. On the front panel tab click vacuum start.
10. When the instrument is ready, click Plasma Start.
11. After the plasma ignites, allow the instrument to warm up for 45 minutes.
12. To begin sample analysis, click the sample tab, build the sample analysis list and click on analyze sample.
13. After the last sample, aspirate the blank long enough to clean the lines.
14. Allow the pump to run long enough without aqueous uptake to void all lines.
15. Turn the flame off and relax lines off of pump.
16. After 5 to 10 minutes, turn off the water supply, exhaust fan and argon.

All bioassay samples need to be analyzed three (3) working days from receipt in the laboratory. Samples are extremely susceptible to contamination. Precautions should be taken to minimize traffic and fugitive dust while samples are digesting.

1.4.6 Reporting and Corrective Actions

As soon as the analytical results are received, they are entered in the logbook and the entries are checked for correctness and completeness.

The lab report is returned to the Radiation Safety Department with results reported as micrograms/liter of uranium. The information must be placed in the individual employee's exposure file and maintained as directed by the DRC.

The Radiation Safety Department is notified immediately of any sample with a concentration greater than 35 micrograms/liter of uranium. Corrective actions will be taken when the urinary uranium concentration falls within the limits listed in Table 1 (attached).

The Radiation Safety Department should compute the error on the control spiked samples and advise the lab if the results are more than $\pm 30\%$ of the known values. If any of the results obtained for the quality assurance control samples are in error by a $\pm 30\%$, the analysis must be repeated.

1.5 IN-VIVO MONITORING

In-vivo body counting for lung burdens of U-natural and U-235 will not be routinely conducted. Monitoring will be conducted at the discretion of the RSO, samples may be sent for a follow-up analysis for specific radionuclides in consultation with DUSA management should potential exposure to an individual warrant.

2.0 RADIATION MONITORING – AREA

2.1 HIGH VOLUME AIRBORNE AREA AIR SAMPLING

Area air sampling involves passing a representative sample of air through a filter paper disc via an air pump for the purpose of determining the concentration of uranium in breathing air at that location. Although the process is only measuring airborne concentrations at a specific place and at a specific time, the results can often be used to represent average concentration in a general area. A high volume sampler or similar high volume pump will be used for this purpose. Samples will be analyzed as per standard gross alpha analysis procedures using a sensitive alpha detector.

2.1.1 Equipment

Monitoring equipment will be capable of obtaining an air sample flow rate of 40 lpm or greater for one hour or longer. A variety of equipment may be used for area air sampling, however normally the equipment used is an Eberline RAS-1, Scientific Industries Model H25004, or equivalent. Equipment is calibrated prior to each usage as per Section 3.6 of this manual.

2.1.2 Frequency/Locations

Area dust monitoring frequency is monthly for the locations shown in Table 2.1.2-1.

**Table 2.1.2-1
Airborne Radiation Sample Locations**

<u>Code</u>	<u>Location/Description</u>
BA1	Ore Scalehouse
BA2	Ore Storage
BA6	Sample Plant
BA7	SAG Mill Area
BA7A	SAG Mill Control Room
BA8	Leach Tank Area
BA9	Washing Circuit CCD Thickness
BA10	Solvent Extraction Building/Stripping Section
BA11	Solvent Extraction Building/Control Room
BA12	Yellowcake Precipitation & West Storage Area
BA12A	North Yellowcake Dryer Enclosure
BA12B	South Yellowcake Dryer Enclosure
BA13	Yellowcake Drying & Packaging Area
BA13A	Yellowcake Packaging Enclosure
BA14	Packaged Yellowcake Storage Room
BA15	Metallurgical Laboratory Sample Preparation Room

<u>Code</u>	<u>Location/Description</u>
BA16	Lunch Room Area (New Training Room)
BA17	Change Room
BA18	Administrative Building
BA19	Warehouse
BA20	Maintenance Shop
BA21	Boiler
BA22	Vanadium Panel
BA22A	Vanadium Dryer
BA23	Filter Belt/Rotary Dryer
BA24	Tails
BA25	Central Control Room
BA26	Shifter's Office
BA27	Operator's Lunch Room
BA29	Filter Press
BA30	Truck Shop
BA31	Women's Locker Room
BA32	Oxidation
BA33A	AF South Pad
BA33B	AF North Pad

Areas BA-10 and BA-12 were soluble uranium exposure areas. These areas were areas where the uranium compounds that were produced are soluble in lung fluids and are comparatively quickly eliminated from the body. All the other areas are insoluble exposure areas. Insoluble uranium areas were areas where the uranium compounds are not readily soluble in lung fluids and are retained by the body to a higher degree. Temperature of drying operations has a significant impact on solubility of uranium compounds. High drying temperatures produce insoluble uranium compounds. Area uranium dust monitoring, during production periods, is weekly in the designated yellowcake production areas. Monitoring increases to weekly in other monitored areas with the observance of levels exceeding 25% of 10 CFR 20 limits and reverts to monthly upon a continued observance of levels below 25% of 10 CFR 20 limits as determined by the RSO. The RSO may also perform any additional samplings at his or her discretion.

As areas are decommission and the ability to sample those areas is removed, the RSO will document this in the files and those areas will be removed from further monitoring.

2.1.3 Sampling Procedures

1. A RAS-1 or similar high volume pump shall be used for area grab sampling. Insure the pump has been recently calibrated within the past month.
2. The locations selected for area air samples should be representative of exposures to employees working in the area.
3. For routine sampling, the sampling period should be for a minimum collection duration of 60 minutes at a flow of 40 lpm or greater.
4. Insert a clean filter into the filter holder on the sampler. Note start time of pump and record unusual mill operating conditions if they exist.
 - A. Stop sample collection and note time. Normally, an automatic timer is connected to the sampler and a 1 hour sample collection time is used.
6. Remove the filter from the sampler and place in a clean glassine envelope or the package supplied by the manufacturer for delivery to the Radiation Department.
7. Count the sample by gross alpha counting techniques and enter the result and sampling information into the record.

2.1.4 Calculations

Perform calculations as specified in Section 4.0.

2.1.5 Records

Logs of all samples taken are filed in the Radiation Safety Officer's files. Data is utilized to calculate radiation exposures as specified in Section 4.0.

2.1.6 Quality Assurance

Calibration checks on each air sampler are made at least monthly to ensure accurate airflow volumes are being collected. Usage of tweezers and new filter storage containers minimizes contamination potential. Field logging of data during sampling and logging of identifying data on sampled filter containers minimizes sample transposition. Samples may periodically be submitted for chemical analysis and a comparison of these results to the radiometric measurements will be made.

Review of data by the RSO and by the ALARA audit committee further assures quality maintenance.

2.2 RADON PROGENY

2.2.1 Definitions

Working Level:

A. The exposure to $1.3E + 05$ MEV of alpha energy or the potential alpha energy in one liter of standard air containing 100 pCi each of RaA (Polonium-218), RaB (Lead-214), RaC (Bismuth-214), and RaC prime (Polonium-214). (Exposure level, not a dose rate)

Kusnetz Method: Method of radon progeny measurement and calculation based upon a 10 liter sample and at least 40 minutes decay time before counting.

2.2.2 Equipment

The equipment utilized consists of the following, or appropriate equivalents:

- Portable personal sampler
- Gelman 25 mm filter holder with end cap, or equivalent
- Gelman Type A/E 25 mm diameter glass fiber filters, or equivalent
- Counter-Scaler – Eberline MS-3 with SPA-1 probe, or equivalent

2.2.3 Frequency/Location

Radon progeny samples are obtained monthly for only those locations occupied by personnel where exposures may have the potential of exceeding 25% of 10 CFR 20 limits.

2.2.4 Procedures

The procedures to be utilized are as follows:

1. Assemble filter trains.
2. Ensure pump batteries are fully charged.
3. Calibrate pump (see Section 3.5).
4. Attached filter trains at sample locations; disconnect end plug.
5. Collect sample in the breathing zone of the employee.
6. Collect sample for five minutes at 4.0 lpm.

7. Log sample site, time started, time stopped, and filter pump number prior to leaving each site on the field log notebook.
8. Samples are counted between 40 minutes and 90 minutes after collection using sensitive alpha detector.
9. Check the calibration and function check information to ensure the detector is calibrated and operating.
10. If the calibration check correlates, proceed with sample analysis.
11. Radon progeny samples are normally counted for three minutes; however any sample count time may be selected for counting.
12. Run background detector count prior to running sampled filters.
13. After counting, calculate working levels.

Equation:
$$\frac{(\text{CPM} - \text{Bkg})}{(\alpha \text{ eff}) (20 \text{ liters}) (\text{Time Factor})} = \text{WL}$$

Where:

- CPM - sample count per minute
- Bkg - counter-detector background count per minute
- α Efficiency - The efficiency of the counting system (See Section 3.2.3.3)
- Time Factor - Values determined from Kusnetz method (See attached Table 2.2.4-1)
- WL - Working Levels

TABLE 2.2.4-1
Time Factors

<u>Min.</u>	<u>Factor</u>	<u>Min.</u>	<u>Factor</u>
40	150	71	89
41	148	72	87
42	146	73	85
43	144	74	84
44	142	75	83
45	140	76	82
46	138	77	81
47	136	78	78
48	134	79	76
49	132	80	75
50	130	81	74
51	128	82	73
52	126	83	71
53	124	84	69
54	122	85	68
55	120	86	66
56	118	87	65
57	116	88	63
58	114	89	61
59	112	90	60
60	110		
61	108		
62	106		
63	104		
64	102		
65	100		
66	98		
67	96		
68	94		
69	92		
70	90		

2.2.5 Exposure Calculations

The personnel exposure calculations are a job-weighted average of those areas and concentrations that an individual is exposed to. The procedure is:

1. Determine areas and durations (hrs.) each individual worked during the period (month and quarter).

2. Determine monitored concentrations (WL) for each area so noted.
3. The multiplication of the hours worked in each area by the area concentration (WL) noted is added to the result for each area involved in the period.
4. The result is the Working Level Hours exposed (WLH) for the period.
5. The working level hours (WLH) divided by 173 (30 CFR 57.5-40 note); or hours per month gives the working level months (WLM) exposure. (The limit is 4 working level months exposure per year.)
6. If calculated per quarter, the working level hours summed for the quarter are divided by 519 (173 X 3) to obtain the working level quarter exposure.

See Section 4.0 for details on how to perform exposure calculations and maintain the exposure records.

2.2.6 Records

Data records, which are filed in the Radiation Safety files, include:

1. Sample location
2. Date and time of sample
3. Time on and off of sample pump
4. Counts per minute of sample
5. Elapsed time after sampling
6. Background detector count
7. Appropriate Kusnetz time factor
8. Working level
9. Sampler identification

Employee exposure records include:

1. Month monitored
2. Areas and duration worked
3. Employee identification
4. Concentrations (WL) observed
5. Calculated WLMs

2.2.7 Quality Assurance

Calibration checks each month assure proper calibration of the counting equipment. Documented semi-annual calibrations of the counting equipment using certified alpha calibration and pulse meter sources ensure proper calibration of the equipment over the

anticipated ranges. The air sampling system has documented calibration prior to each use, ensuring sampling the appropriate air volumes. Duplicate counts of select data may be counted to assure instrument precision. Field documentation is maintained for each sample during monitoring. This methodology provides assurance in data quality.

Review of data by the RSO and the ALARA audit committee further assures quality maintenance.

2.3 ALPHA SURVEYS

2.3.1 Equipment

Equipment to be utilized in area alpha surveys is shown in Appendix 1. Pre-use function checks will be performed on all radiation survey equipment as specified in Section 3.1.2.3.2.

2.3.2 Frequency/Locations

Fixed and removable alpha surveys are made at those general locations on the Table 2.3.2-1, “Alpha Area Survey Locations.” Surveys are completed weekly in those areas designated by the RSO as authorized lunchroom/break areas are monitored. Designated eating areas are listed in Table 2.3.2-2.

As areas are decommission and the ability to sample those areas is removed, the RSO will document this in the files and those areas will be removed from further monitoring.

**Table 2.3.2-1
White Mesa Mill
Alpha Area Survey Locations**

Scale House Table
Warehouse Office Desks
Maintenance Office Desks
Change Room Lunch Tables
Maintenance Lunchroom Tables
Mill Office Lunchroom Tables
Metallurgical Laboratory Desks
Chemical Laboratory Desks
Administrative Break Room Counter
Administrative Office Desks

Table 2.3.2-2
White Mesa Mill
Designated Eating Area Locations

Maintenance Supervisor Break Room
Main Lunch/Training Room
Administrative Break/Conference Rooms
Administrative Office Desks

2.3.3 Procedures

2.3.3.1 Respirators

Respirators are monitored utilizing a removable alpha smear that is read using alpha scaler meter such as a Ludlum Model 2200 or other equivalent radiological instruments. Readings exceeding 100 dpm/100 cm² result in re-cleaning or discarding of the respirator. Respirator cleaning and monitoring is a function of the Radiation Safety staff assigned to this duty. The meter's performance is checked prior to each use period.

2.3.3.2 Fixed Alpha Surveys

Alpha surveys for fixed alpha contamination are performed using a variety of alpha detecting instruments, as listed in Appendix 1. Each instrument is checked using a calibrated alpha source for proper function and operation prior to use, as described in Section 3.1.2.3.2.

Adjustments to the surface area being measured must be made to convert from the particular detector's surface area to the commonly used surface area of 100 cm². Therefore when converting a measurement to the commonly used unit of dpm/100 cm², a multiplying area factor must be applied to the measurement. For the Ludlum instrument with a 43-1 detector of 75 cm² surface, multiply the value by 1.33 (i.e. 100 cm² divided by 75 cm²).

The procedures are:

1. Turn the meter on and check the meter battery condition.
2. Check alpha detector mylar surface for pinholes, etc. Replace if necessary and repeat calibration.
3. As specified in Section 3.1.2.3.2, perform a function calibration check using calibrated alpha source.
4. If check is acceptable, proceed with monitoring.

5. At each designated site, monitor designated surfaces, table tops, etc., holding within $\frac{1}{4}$ inch of the surface.
6. Record data, location, cpm/cm² monitored on data sheet.
7. At the conclusion of the survey, transpose results to the file log, correcting to dpm/100 cm², using correction for detector's surface area and cpm/dpm conversion factor.

2.3.3.3 *Removable Alpha Surveys*

The Ludlum Model 2200 scaler with 43-17 detector, or a variety of other sensitive alpha detection instruments such as Model 2929 or equivalent, counts wipe samples collected during removable alpha surveys. Glass fiber filters, sized to fit the detector sample slot, are utilized as the wipe medium. A template having a 100 cm² surface area maybe used to standardize the surface area wiped.

The procedure is:

1. Perform function check calibration of the scaler/detector. Ensure that this measurement is within $\pm 10\%$ of the value obtained from the calibration laboratory.
2. If so proceed with the survey and counting.
3. Obtain clean filters and clean envelopes for filter storage.
4. At a location to be surveyed, remove the filter from the envelope and wipe the surface covering approximately 100 cm². This is easily accomplished by making an "S" shaped smear for approximately 10 inches using normal swipes (approximately 2.5 cm diameter).
5. Record on envelope the date and location of the sample.
6. Upon returning to counting lab, place an unused filter in the counting unit for at least 1 minute and obtain a background count rate.
7. Repeat procedure for each used filter, extracting filter from envelope, immediately prior to counting, using tweezers and placing in the detector slot with the wiped surface facing the detector, and count for at least 1 minute.
8. Convert results from cpm/filter to dpm/filter (100 cm² wiped) after subtracting the blank background count.

9. Record on the alpha survey form the following information:

- A. Sample location and conditions
- B. Sample date
- C. Sampler identification
- D. Wipe count dpm/100 cm²

10. Discard the filters and envelopes

2.3.4 Action Limits

2.3.4.1 Respirators

Levels greater than 100 dpm/100 cm² squared require re-cleaning or discarding of a respirator.

2.3.4.2 Fixed Alpha Surveys

Levels greater than 1,000 dpm/100 cm² squared require remedial action by management. ALARA criterion ensures that the RSO takes action where necessary to maintain levels as low as reasonably achievable.

2.3.4.3 Removable Alpha Surveys

Levels greater than 1,000 dpm/100 cm² squared require remedial action and decontamination. ALARA criteria ensure that the RSO takes action where necessary to maintain levels as low as reasonably achievable.

2.3.5 Records

Records of fixed and removable alpha surveys are maintained in the Radiation Safety office files. Records include:

- 1. Sample location/conditions
- 2. Sample date
- 3. Sampler identification
- 4. Fixed alpha determination – dpm/100 cm²
- 5. Removable alpha determination – dpm/100 cm²
- 6. Remedial action taken, where necessary

2.3.6 Quality Assurance

Calibration function checks of detector performance and visual observation of detector surfaces prior to each survey ensures counting reliability and consistency. Usage of clean

containers and tweezers minimizes contamination of wipe samples. A Field log of sample I.D.'s on sample containers minimizes transposition of samples. Data review by the RSO and by the Audit Committee further assures quality maintenance.

2.4 BETA-GAMMA SURVEYS

2.4.1 Equipment

Beta/Gamma surveying instruments used for beta-gamma surveys are listed in Appendix 1 and the sources used are listed in Appendix 2.

Some instruments read directly in mrem/hour while others read in cpm (with a conversion to mrem/hour). The model 44-6 detector has a removable beta shield allowing discrimination between beta and gamma contributions. Each instrument has a manufactures user's manual which describes the function, use and capability of each instrument. These manuals must be understood before surveying proceeds. Calibration of Beta/Gamma and functional checks are performed using calibrated Cs-137 or SrY 90 sources

2.4.2 Frequency/Locations

The sites noted on Table 2.4.2-1 may be monitored on a monthly basis by of the Radiation Safety staff. During reclamation periods, only areas routinely occupied by personnel are monitored as designated by the RSO. As areas are decommission and the ability to sample those areas is removed, the RSO will document this in the files and those areas will be removed from further monitoring.

**Table 2.4.2-1
 Beta-gamma Survey Locations**

<u>Identification Number</u>	<u>Description of Possible Source of Area of Exposure</u>	<u>Distance from Source in cm</u>
WM-1	Mill Feed Hopper & Transfer Chute	1
WM-2	SAG Mill Intake-Feed Chute	1
WM-3	Screens-Area Floor Between Screen	1
WM-4	Leach Operator's Desk	1
WM-5	Leach Tank Vent #3	1
WM-6	Leach Tank #3 – Wall	1
WM-7	CCD Thickeners	1
WM-8	Pumphouse Tailings Discharge	1
WM-9	Oxidant Makeup Room-Sump Pump	1
WM-10	Shift Foreman's Office-Work Desk	1
WM-11	SX Operator's Area	1
WM-12	Precipitation Tanks #1 Tank; Wall	1
WM-13	Precipitation Section "Lab Bench"	1

<u>Identification Number</u>	<u>Description of Possible Source of Area of Exposure</u>	<u>Distance from Source in cm</u>
WM-14	Precipitation Vent	1
WM-15	Yellowcake Thickener #1; Wall	1
WM-16	Centrifuge Discharge-Chute Wall	1
WM-17	Yellowcake Thickener #2; Wall	1
WM-18	Yellowcake Packaging Room	1
WM-19	Yellowcake Dryer	1
WM-20	Yellowcake Dust Collector	1
WM-21	SX Uranium Mixer #1 Extractor	1
WM-22	SX Uranium Mixer #1 Stripping	1
WM-23	SX Vanadium Mixer #1 Stripping	1
WM-24	Vanadium Dryer	1
WM-25	Mill Laboratory Fume Hood	1
WM-26	Chemical Laboratory Work Area	1
WM-27	Metallurgical Laboratory Work Area	1
WM-28	Lunchroom Eating Area	1
WM-29	Lunchroom Wash Area	1
WM-30	Maintenance Shop – Work Area	1
WM-31	Maintenance Shop – Rubber Coating	1
WM-32	Tailings Impoundment Discharge	1
WM-33	Tailings Impoundment Dike 1	1
WM-34	Tailings Impoundment Dike 2	1
WM-35	Tailings Impoundment Dike 3	1
WM-36	Scalehouse	1
WM-37	Tailings Impoundment Dike 4	1

2.4.3 Procedures

The monitoring procedures are:

1. Check meter battery condition.
2. Check detector using a check source.
3. If the calibration function check indicates that the instrument is operating within calibration specifications, proceed with monitoring.
4. Survey each designated location on Table 2.4.2-1 and record in the field log:
 - A. Site location/condition
 - B. Date
 - C. Instrument used
 - D. Sampler's initials
 - E. Meter reading (beta + gamma)
 - F. Meter reading (gamma)

5. Upon returning to the office, record the mrem/hr reading into a permanent file which is maintained for beta-gamma exposure evaluation.

2.4.4 Action Levels

The ALARA concept is utilized in action levels. Responses include operative cleaning of the area or isolation of the source. The Radiation Safety Department will ensure levels ALARA.

2.4.5 Records

Records maintained in the Radiation Safety office files include:

1. Date monitored
2. Site location/condition
3. Instrument used
4. Sampler's initials
5. Beta/Gamma level, mrem/hr
6. Remedial action taken, if necessary

2.4.6 Quality Assurance

Quality of data is maintained with routine calibration and individual function checks of meter performance. Personnel utilizing equipment are trained in its usage. Records of the operational checks and calibrations are maintained in the files. The RSO routinely reviews the data and the ALARA audit committee periodically analyzes the performance of the management of the monitoring and administrative programs.

2.5 EXTERNAL GAMMA MONITORING

External gamma area monitoring is conducted at various locations around the Mill site in order to provide Radiation Safety Staff with area-specific gamma measurements. The procedures applicable to such monitoring are set out in Section 4.3 of the Mill's Environmental Protection Manual.

2.5.1 Locations and Frequency of Monitoring

External gamma measurements are taken over a quarterly interval for the twelve months of the year at all BHV locations and selected areas around the mill site (see Attachment #1 for those locations).

2.5.2 Quality Assurance

Quality assurance for external gamma measurements consists of:

- 2.5.2.1.1** Monitoring the container locations to ensure the TLDs have not been lost;
- 2.5.2.1.2** Ensuring that all containers are present when receiving or shipping to Landauer; and
- 2.5.2.1.3** Reviewing Landauer data for consistency and data transportation.

2.5.3 Analytical Requirements

Values reported are in millirems per week average for the monitor period (supplied by Landauer) along with a counting error term. The counting error term is calculated by:

$$[(\text{sample 2 sigma}) - (\text{control mrem/week})] / (\text{\#weeks})$$

2.5.4 STANDARD OPERATING PROCEDURES

2.5.4.1 Equipment

External gamma is monitored at the ambient air sampling sites and other selected areas around the mill site, using the OSL badges from Landauer, Inc., or the equivalent.

2.5.4.2 Monitoring Methodology

- 2.5.4.2.1** The containers, each containing five TLD chips, are mounted approximately one meter above ground plane at each site with one container per site.
- 2.5.4.2.2** The containers loaded with TLDs are received the first of each quarter from Landauer and exchanged with those in the field.
- 2.5.4.2.3** A background TLD is stored in the Administration Vault as a transportation control.
- 2.5.4.2.4** The TLDs are returned to Landauer for processing.

2.5.4.3 Record Keeping

Data maintained in record form for external gamma is:

- 2.5.4.3.1** Sample period;

2.5.4.3.2 Sample location; and

External gamma levels for total radiation.

2.6 EQUIPMENT RELEASE SURVEYS

2.6.1 Policy

Materials leaving a Restricted Area going to unrestricted areas for usage must meet requirements of NRC guidance for “Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use” (dated April 1993).

All material originating within the restricted area will be considered contaminated until checked by the Radiation Safety Department. All managers who desire to ship or release material from the facility will inform the RSO of their desires. The RSO has the authority to deny release of materials exceeding NRC guidance for “Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use” (dated April 1993). No equipment or materials will be released without documented release by the RSO or his designee.

2.6.2 Limits

The release limits for unrestricted use of equipment and materials is contained in the NRC guidance listed above in Section 2.6.1 and are summarized as follows:

Limits for Alpha emissions for U-Nat and its daughter products are:

Average	5,000 dpm/100 cm ²
Maximum	15,000 dpm/100 cm ²
Removable	1,000 dpm/100 cm ²

Limits for Beta-gamma emissions (measured at a distance of one centimeter) for Beta/Gamma emitting radioisotopes are:

Average	0.2 mrem/hr or 5,000 dpm/100 cm ²
Maximum	1.0 mrem/hr or 15,000 dpm/100 cm ²

2.6.3 Equipment

Radiological survey instruments are listed in Appendix 1.

2.6.4 Procedures

Upon notification that materials are requested for release, the Radiation Safety Department shall inspect and survey the material. Surveys include fixed and removable alpha surveys and beta-gamma surveys. See sections 2.3 Alpha Surveys and 2.4 Beta-Gamma Surveys for a detailed breakdown on the surveying aspects and equipment used for each survey. An equipment inspection and release form, see attached, is to be prepared and signed by the RSO or his designee. Any material released from the mill will be accompanied with the appropriate release form. If contamination exceeds levels found in NRC guidance “Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use”, (dated April 1993), then decontamination must proceed at the direction of the RSO. If the material cannot be decontaminated, then it will not be released.

2.6.5 Records

Documented records for each released item are filed in the Radiation Safety Department files. These files shall include a completed Release Form, see attached, and a photograph of the material that is being released.

2.6.6 Quality Assurance

The RSO and the ALARA Audit Committee periodically review the policy and documented release forms to ensure policy and regulatory compliance.

2.7 Field Gamma Surveys

The field gamma surveys will be conducted in accordance with the currently approved Reclamation Plan, Section 6 of the Technical Specifications.

3.0 EQUIPMENT/CALIBRATION

All radiation detection instruments used at the Mill are sent to a qualified independent laboratory for calibration every six months. If necessary, Radiation Safety Staff can use the procedures outlined below to verify calibration.

3.1 Counters/Detectors

3.1.1 General

All radiation detectors require determination of detector optimal voltage performance or plateau operating point. The graph of voltage applied to a detector versus detector response is referred to as a plateau curve. The plateau curve typically has two rapidly sloping sections and a stable, flat region. The optimal operating point is typically located at the beginning of the flat, or flatter, section of the graph. The plateau curve is specific for a particular detector and its accompanying readout, or measuring meter, and may vary over time depending upon electronic component condition.

The equipment used to determine detector plateau curves includes:

1. Appropriate radiation sources
2. Electrostatic voltmeter
3. Radiation detecting instrument
4. Graph paper
5. Manufacturer's technical manual

The procedure is:

1. Ensure instrument batteries are fresh or fully charged, if applicable.
2. Turn the instrument on.
3. Adjust the instrument voltage control starting at voltage of 600 using electrostatic voltmeter to monitor voltage setting.
4. Expose detector to a radiation source applicable to the type of detector and in the appropriate setting.
5. Record voltage and instrument response for each adjustment of voltage applied; increments of 50 volts are adequate.
6. Repeat steps 4 and 5 until instrument response rapidly increases versus voltage level. At this point, the detector is approaching potential differentials across the electrode that may damage the detector.

7. Graph instrument response versus voltage applied.
8. Set equipment high voltage control to the optimum operating point. Record on graph voltage selected.
9. Retain graph with calibration records.

3.1.2 Function Checks

Calibration function checks are required prior to use of radiation detection instruments used at the Mill for the purpose of verifying that the instruments are operating at the same efficiency as when they were calibrated by the calibration laboratory (i.e., within +/-10%). Function checks are also used for verifying repeatability, reliability, and comparability of an instrument's measurements from one period to another. By performing function checks for extended time periods, or on a larger sample size, these goals are met.

Function checks involve two basic elements:

- (1) The calibration laboratory efficiency is compared to the instrument's efficiency on the date of the function check; and
- (2) The function check is verified with a check source having similar isotopic composition as the one that was used by the calibration laboratory to calibrate the instrument.

Function checks are made for all types of radiation survey instruments. The basic principle in performing a function check is measuring the radiation field using a survey instrument against a known amount of radiation from a calibrated source. These measurements are made for the specific type of radiation occurring. For example, when performing a beta/gamma survey, the instrument function check is performed using a beta/gamma check source, such as a (SrY)-90. When performing an alpha survey, use an alpha check source, such as Th-230 or Pu-239 for performing the function check.

Function checks are documented on the Calibration Check Forms (see Attachment A for copies of forms to be used) for each specific instrument. They will be maintained in the instrument's calibration and maintenance file.

A number of radiation detection instruments are used at the Mill. An Instrument Users Manual for each instrument is maintained in the calibration files, together with calibration documentation. The Users Manuals are to be considered the primary reference for operating a particular instrument. This Standard Operating Procedure (SOP) is not intended to replace the Users Manual, but rather to supplement the Manual by providing steps to be performed for function checks. Before operating an instrument, personnel should read the Users Manual and become familiar with the instrument's operation,

capabilities, and special features. Personnel will also receive on the job training on each instrument.

3.1.3 Alpha Monitors

Alpha particles travel very short distances in the air due to their high ionization ability – typically ¼ to ½ inch. Due to this limitation, alpha monitoring must be done at a distance of ¼ inch or less between the detector face and the source. Alpha monitoring, to be consistent, requires ensuring a consistent distance be utilized between the detector face and the source. Alpha detectors read out in counts per minute (cpm). A correlation relationship, known as the efficiency factor, between the meter response and the actual disintegration rate of the source is used to determine actual calibration of the meter.

Radioactivity is measured in curies (Ci), which, by definition, is 3.7×10^{10} disintegrations per second (dps), or 2.2×10^{12} disintegrations per minute (dpm). Another measurement unit is the Becquerel, or one dps. Alpha radiation is usually monitored as dpm, per surface area measured.

Radiation survey equipment used at the Mill for alpha surveys is listed in Appendices 1 and 2.

3.1.3.1 Calibration and Function Check Frequency

The frequency of calibration is specified in individual instrument user manuals and manufacturer's specifications.

The following frequencies are observed for calibration and function checks of radiation detection instruments:

<u>Type</u>		<u>Calibration Frequency</u>	<u>Function Checks</u>
1.	Employee scans	6 months	7 days/week
2.	Radon progeny	6 months	each use
3.	Respirator checks	6 months	each use
4.	Area fixed scans	6 months	Daily or each use
5.	Area wipe scans	6 months	Daily or each use

3.1.3.2 Function Check Procedures – Alpha Counters and Scaler Instruments

The following steps will be used for function checks for alpha counters and alpha scaler instruments.

1. Turn the instrument on and place a calibrated alpha check source in the detector holder on or the face of the detector.
2. Count the source for 1 minute and record this value in cpm.
3. Repeat step 2 four more times.
4. Average the five readings and divide the average in cpm by the known activity on the alpha source. This is the efficiency of the instrument and detector.
5. Compare this efficiency with the efficiency obtained from the calibration lab. If the efficiency comparison is within $\pm 10\%$ deviation the instrument needs is calibrated if not the instrument needs to be recalibrated.
6. If this efficiency comparison is within $\pm 10\%$ deviation the instrument is in calibration.
7. Proceed with monitoring activities.

3.1.3.4 *Calibration Procedures*

All radiation detection instruments used at the Mill are sent to a qualified offsite laboratory every six months for calibration. However, if additional onsite calibration is required the calibration procedures are:

1. Set the detector high voltage at the prior determined operating point using an electrostatic voltmeter.
2. For counter/scalers (radon progeny/wipes), close the detector, without source present, obtain a reading for a set time. This is a background reading.
3. Place a calibrated source for the type of radiation being measured in the source holder and obtain reading.
4. Observe the cpm for both the background and the source.
5. Subtract the cpm value of background from the cpm value of the source to obtain the net cpm.
6. Divide the net cpm value by the known dpm of the source. This is the percentage efficiency of the instrument system for this energy source.
7. By dividing 100 by this efficiency, an efficiency factor is obtained.

8. Dpm equals the cpm divided by the efficiency of the instrument detector system:

Note:

$$\begin{aligned}1 \text{ curie} &= 2.22 \text{ E} + 12 \text{ dpm} \\1 \text{ microcurie} &= 2.22 \text{ E} + 6 \text{ dpm} \\1 \text{ picocurie} &= 2.22 \text{ dpm}\end{aligned}$$

3.1.4 Beta-gamma Monitors

Equipment utilized for beta-gamma monitoring is listed in Appendices 1 and 2.

3.1.4.1 Function Check Procedure

The following steps will be used for function checks on beta/gamma instruments:

1. Turn the instrument on and place the calibrated beta/gamma (SrY-90) check source on the face of the detector.
2. Let the reading stabilize to a constant value.
3. Record this value in cpm.
4. Divide this value by the known activity on the check source. This is the efficiency of the instrument and detector.
5. Compare this efficiency to the efficiency obtained from the calibration laboratory. If the efficiency comparison is within $\pm 10\%$ deviation the instrument needs is calibrated if not the instrument needs to be recalibrated.
6. If this efficiency comparison is within $\pm 10\%$ deviation the instrument is in calibration.
7. Proceed with monitoring activities.

3.1.4.2 Calibration

All beta-gamma survey instruments are sent out every six months for calibration. Additional calibration, if necessary, may be performed on site using techniques described in Reg. Guide 8.30, Appendix C – Beta Calibration of Survey Instruments for calibration performed by a qualified calibration laboratory using the indicated source as listed in Appendix 2.

3.1.5 Gamma Monitors

Instruments for gamma measurements are listed in Appendix 1.

3.1.5.1 Calibration

Independent calibration service laboratories shall perform calibrations every six months. Meters are calibrated to Cs-137 or other radioisotopes as suggested by the calibration laboratory or manufacturer. Most calibration service laboratories calibrate Beta/Gamma instruments electronically in accordance with their standard calibration procedures. However, electronic calibration basically consists of the steps described below:

1. Connect survey instrument to be calibrated to the Model 500.
2. Turn both instruments on.
3. Record high voltage reading on Model 500.
4. Set cpm and the range multiplier on the Model 500 to the desired meter deflection. The model 500 frequency controls consist of the three-digit readout, range selector, coarse tuning knob, and the fine tuning knob. The three-digit readout is in cpm times the frequency multiplier.
5. Calibrating survey instruments in cpm:
 - A. Set Model 500 frequency to value that will provide a $\frac{3}{4}$ meter deflection on the survey instrument's highest count scale. Set pulse height/amplitude to twice instrument input sensitivity.
 - B. Adjust the range calibration potentiometer on the survey meter to provide correct reading record.
 - C. De-code Model 500 frequency to next lower value; then do the same for the survey instrument.
 - D. Adjust the range calibration potentiometer for correct reading on survey instrument. Record readings.
 - E. Repeat process until all ranges have been calibrated at $\frac{3}{4}$ meter deflection. Record readings.
 - F. Return to highest count scale on survey meter.
 - G. Set Model 500 for $\frac{1}{4}$ scale deflection readings.
 - H. Survey instrument should read within $\pm 10\%$ of Model 500 frequency. Record readings.

- 1) If readings are outside of the tolerance, re-calibrate for $\frac{3}{4}$ meter deflection.
- 2) Tap instrument meter lightly to check for sticky meter. Meter tolerance is $\pm 3\%$ from the initial readings to the final reading.
- I. Decode Model 500 to next lower scale. Check survey instruments for $\frac{1}{4}$ scale reading. Record.
6. Record input sensitivity.
 - A. Select the most sensitive amplitude range 0-5 mv on the Model 500.
 - B. Observe meter on survey instrument.
 - C. Increase pulse amplitude, switching to next higher range, if necessary, until the rate meter indicates a stable reading (i.e., further increase of pulse amplitude does not cause an increase in meter reading). Now, decrease pulse height until the survey instrument meter reading drops $15 \pm 5\%$. Record this pulse height as the instrument sensitivity.
 - D. If your instrument has a gain or threshold control to set instrument sensitivity, set pulse height on the Model 500 to desired sensitivity level. Now adjust your instrument threshold or gain control until the rate meter reading is within $85 \pm 5\%$ of its stable reading value (see step C). Record the pulse height as instrument sensitivity.
7. Calibrating survey instrument to cps.
 - A. Set frequency in Model 500. Divide the Model 500 readings by 60 to convert to counts per second.
 - B. Repeat calibration steps as in item 5 above.

3.1.5.2 *Frequency of Calibration*

If electronic calibration is performed using the above method by the Radiation Safety Department, the Model 500 pulse generator will be sent out for calibration on an annual basis.

3.2 PERSONNEL AIR SAMPLERS

The calibration procedure for personnel air samplers involves one of three calibration procedures. Samplers will be calibrated prior to each use by one of the three

methodologies: bubble tube, electronic or mass flow determinations. Air samplers may be calibrated to standard air conditions.

3.2.1 Bubble Tube Calibration Method

The Bubble Tube Calibration Method is a calibration method and does not require corrections to or from standard conditions for temperature and pressure. Personal air samplers are calibrated for the flow rate for the sampling being performed, typically 2-4 lpm.

The equipment utilized is as follows:

1. Burette – 1,000 ml capacity, 10 ml divisions
2. Support, iron, rectangular base, with rod
3. Burette clamps – 2
4. Soap solution, dish
5. Tubing, Gelman filter holder, filter media (0.8 micron glass fiber Gelman type A/E)
6. Stopwatch
7. Small screwdriver
8. Sample pump

The procedures utilized are:

1. Assemble a filter train – place a filter in an in-line filter. Attach two lengths of tubing to each connector of the in-line filter holder.
2. Make sure the Burette is clean. Clamp the 1,000 ml Burette upside down on the ring stand with the Burette clamps.
3. Attach the pump to be calibrated to one end of the filter train, connect the other end of the filter train to the small end of the 1,000 ml Burette, as per Figure 1.
4. Check all tubing connections for air tightness.
5. Pour approximately ½ inch (12 mm) of soap solution into the dish.
6. Start the pump.
7. Raise the dish up under the Burette opening, and then immediately lower the dish. This should cause a film of soap to form over the Burette opening (i.e., a bubble). Repeat this procedure until the film (bubble) will travel up the inverted Burette the length of the graduation marks on the Burette without breaking.

8. When the film (bubble) has wetted the Burette inside and will travel the entire length of the graduated area of the Burette, proceed with the actual calibration run.
9. Quickly form three bubbles and start the stopwatch when the middle bubble is at the bottom graduation line (actually the 1,000 ml mark, but for purposes here, it will be called the “zero” line).
10. Time the travel of the bubble from the zero line to the top line of the graduated distance (0 ml). Since the capacity of the Burette is 1,000 ml (1.0 liter), then the volume of air that is displaced above the bubble (i.e., needed to raise the bubble) is 1.0 liter. Stopping the stopwatch at the top mark is the time elapsed for the pump to accomplish this. The rate of rise of the bubble through the apparatus is the flow rate of air being pulled by the pump.
11. Increase or decrease the pump collection rate by adjusting the appropriate screw or knob designed for this purpose.
12. Set the pump flow collection rate to the desired valued usually between 2 and 4 liters per minute for low volume collection pumps and between 30 and 80 liters per minute for high volume collection pumps.

3.2.2 Mass Flow Method

Mass flow meters are manufactured equipment designed to measure air collection flow rates for a variety of purposes. Mass flow meters may be subject to temperature and pressure corrections of air movement depending on whether they are calibrated/manufactured for standard conditions.

Utilizing an air mass flow meter, traceable to NBS, the airflow rate of pumps can be quickly adjusted to correct standard flow rate conditions. However, the mass flow meter must be calibrated annually using a primary calibration method.

The equipment consists of the following:

1. Kurz air mass flow model 543 or equivalent
2. Suitable filter head adapter connections
3. Filter heads with filter media
4. Pump to be calibrated

Note: The meter is calibrated directly in standard air conditions – 25° C., 29.82” Hg.

The procedures utilized are:

1. Ensure pump batteries are fully charged.

2. Ensure flow meter batteries are fully charged.
3. Assemble filter train.
4. Connect (with a suitable adapter) the Kurz probe onto the filter train. Ensure an airtight seal with tape, if necessary.
5. Set the meter function switch to the highest range: 40 std liters per minute.
6. Turn the pump on.
7. Select appropriate range on the meter. (Do not allow meter needle to be forcibly pegged.)
8. Adjust the pump flow rate as necessary to desired flow rate. Allow the meter to stabilize before adjustment of the pump.
9. Meter reads directly in standard air conditions, correcting for temperature and barometric pressure.

Pump is now calibrated. Low volume pumps are set 4 lpm.

3.2.3 Electronic Calibration Method

The electronic calibration is the calibration method and does not require corrections to or from standards conditions for temperature and pressure. Personal air samplers are calibrated for the flow rate for the sampling being performed typically 2 – 4 lpm. Area Airborne high volume air samplers should be calibrated to a minimum of 40 lpm.

The equipment utilized is as follows:

1. UltraFlo Primary Gas Flow Calibrator, or equivalent
2. Soap solution
3. Tubing
4. Small screwdriver
5. Sample pump

The procedure proceeds as follows:

1. Remove the two nipples on the back of the UltraFlo Primary Gas Flow Calibrator.
2. Attach the connection tubing from the top nipple to the sample pump.
3. Turn calibrator on.
4. Turn sample pump on.

5. Press the plunger style button on top of the soap dispensing portion of the device.
6. Write down the digital reading from the calibrator device.
7. Repeat steps 5 and 6 three times.
8. Take an average of the three readings.
9. If the sample pump requires adjustment, take the screwdriver and adjust the set screw on the face of the sample pump and then repeat steps 5 through 7.
10. After the sample pump is calibrated, document the calibration on the Breathing Zone/Radon or the High Volume Calibration Sheet depending on which device is being calibrated, in the Radiation department.
11. Replace nipple caps on the back of the calibrator.

3.3 AREA AIR SAMPLERS

The calibration procedure for area air samplers involves one of the following procedures; Kurz Mass Flow, Wet Test Gas Meter, Electronic or Bubble Tube Method.

3.3.1 Kurz Mass Flow Method

Repeat procedures discussed in 3.2.2 – except – airflow rate is adjusted to 40 slpm and samplers utilized are:

1. Eberline RAS-1
2. Scientific Industries Model H25004
3. Equivalent

3.3.2 Wet Test Gas Meter Method

The wet test gas meter method utilizes a Precision Scientific wet test meter rated at one cubic foot per revolution of the main dial. This method is used to calibrate the Kurz air mass flow meter in addition to direct calibration of the area air samplers.

The procedures are:

1. Attached coupling to sampler filter assembly; secure it with tape.
2. Connect wet test meter hose to coupling.
3. Check water level of wet test meter. The needle should be on slightly above the water level.
4. Check the thermometer temperature of the wet test meter. Record this on the calibration sheet. Assume that the wet and dry bulb temperatures are the same.

5. Turn on the sampler. Check the wet test meter's manometer reading. This reading is obtained by adding the left and right column values. (A typical reading might be .3). Log these values for each ball height on the "Static pressure ... H₂O" column.
6. For the following sampler approximate settings, pull one cubic foot of air through the wet test meter and record the time (in seconds) for each: 20, 30, 40, and 50 lpm.

Sampler Calibration Procedures – Calculations and Equations

1. To convert the static pressure (of the manometer attached to the wet test meter) from inches of water to inches of mercury, divide the number of inches to water by 13.6. Example: $0.4/13.6=0.02941176''$ Hg
2. To compute the actual flow rate ("Q rate act. lpm"), first divide the number of cubic feet by the number of seconds. Example: $1 \text{ ft.}^3/90 \text{ sec} = .01111 \text{ ft.}^3/\text{awx}$. Convert the cubic feet to liters. The conversion factor is 28.317. Example: $.01111 \text{ ft.}^3/\text{sec} \times 28.317 \text{ L ft.}^3 = .3146 \text{ L/sec}$. Multiply this by 60 to convert from seconds to minutes. Example: $.3146 \text{ L/sec} \times 60 \text{ sec} = 1888 \text{ L/m}$ or 18.88 lpm.
3. Using the "Vapor Pressures of Water" chart, find the vapor pressure inside the wet test meter by matching the wet bulb temperature with the corresponding vapor pressure. This number is the vapor pressure at the standard wet bulb (Pvpstw).
4. Find the vapor pressure at dewpoint using this formula: $P_v \text{ dewpoint} = P_{vpstw} = 0.0003613 (td-tw) B_p$ (Where +d = dry bulb temp; tw = wet bulb temp; bp = barometric pressure in inches of mercury.) Assume that the dry bulb temperature and the wet bulb temperature are the same, so the difference between them will always be zero. Thus, P_v dewpoint will equal Pvpstw.
5. Determine the actual air density (D act) with this formula:

$$D \text{ act} = \frac{1.327}{td + 459.67 [(P_g - S_p) - 0.378 (P_v \text{ dewpoint})]}$$

(Where td - dry bulb temp in degrees F.; B_p = barometric pressure in inches of mercury; S_p = static pressure of wet test meter in inches of mercury.)

Example:

$$\begin{aligned}
 D_{act} &= 1.327 \\
 &\quad 70.5 + 459.67 \quad [(24,8031 - 0.02941176) - 0.378 (.875)] \\
 &= 1.327 \\
 &\quad 530.17 \quad (24,773688 - 0.33075) \\
 &= (0.00250297) (24.442938)
 \end{aligned}$$

$$D_{act} = 0.06117996$$

Log this in “Air Density lbs/ft³” column of log sheet.

6. Find the flow rate of the sampler at standard conditions (Q std) using this formula:

$$Q_{std} = Q_{act} \frac{D_{act}}{D_{std}}$$

(Where D std = .075 lbs/ft³)

$$\begin{aligned}
 (\text{i.e., } Q_{std} &= 18.88 \frac{(0.06117996)}{0.075} \\
 &= 18.88 (0.8157328) \\
 &= 15.40
 \end{aligned}$$

Q std = 15.40 (write this down for each position in the Q 0.075 column)

3.3.3 Bubble Tube Method

Refer to Section 3.2.1 to perform this method.

3.3.4 Electronic Calibration

Refer to Section 3.2.3 to perform this method.

4. EXPOSURE CALCULATIONS AND RECORD MAINTENANCE

4.1 PERSONNEL EXPOSURE CALCULATIONS

4.1.1 DACs for Conventional Ores

4.1.1.1 *Solubility Classes*

The solubility class, chemical form and abundance of conventional ores at the Mill, and the resulting DACs to be used are as set out in the following table:

Table 4.1.1.1-1
Solubility Class, Chemical Form and Abundance of Conventional Ores

Location	DAC	U nat	Th-230	Ra-226	Pb-210
Ore-Grind	6.00E-11	DAC is specified in 10 CFR Part 20			
Leach	2.8E-10	½ Ore, ½ Precipitation	½ Ore, ½ Precipitation	½ Ore, ½ Precipitation	½ Ore, ½ Precipitation
CCD	1.2E-11	Class D Sulfate 25%	Class W ¹ Sulfate 25%	Class W ¹ Sulfate 25%	Class D ¹ Sulfate 25%
SX	1.2E-11	Class D Sulfate 25%	Class W ¹ Sulfate 25%	Class W ¹ Sulfate 25%	Class D ¹ Sulfate 25%
Precipitation	5.00E-10	Class D ² Diuranate 100%	NA	NA	NA
Yellowcake Packaging	2.20E-11	Class Y: 90 % and Class W: 10 % Oxide 100%	NA	NA	NA
Tailings	1.70E-11	Class Y Oxide 4%	Class Y ² Oxide 32%	Class W ¹ Oxide 32%	Class W ¹ Oxide 32%

¹ 10 CFR Part 20, Appendix B

² NUREG/CR-0530, PNL-2870, D.R. Kalkwarf, 1979, "Solubility Classifications of Airborne Products from Uranium Ores and Tailings Piles"

4.1.1.2 *Application of Conventional Ore DACs to Workplace Locations*

The Conventional Ore DACs will be applied as follows to the various locations in the Mill site:

**Table 4.1.1.2-1
Application of Conventional Ore DACs to Workplace Locations**

Type of DAC	DAC ($\mu\text{Ci/ml}$)	Individual Location
Ore/Grind	6.00E-11	Ore Scalehouse Ore Storage Maintenance Shop Warehouse Lunch Room Change Room Administration Bldg
Ore/Grind	6.00E-11	Dump Station
Ore/Grind	6.00E-11	SAG Mill SAG Mill Control Shifter's Office Operations Lunch Room Filter Press
Leach	2.80E-10	Leach Tank Area
CCD	1.20E-11	CCD Circuit Thickeners
SX	1.20E-11	SX Building South Boiler
Ore/Grind	6.00E-11	Control Room
Yellowcake Precipitation	5.00E-10	YC Precipitation & Wet Storage
Yellowcake Packaging	2.20E-11	North YC Dryer Encl. South YC Dryer Encl. YC Pkg Enclosure YC Drying & Packaging Area Packaged YC Staging Area
Tailings	1.70E-11	Truck Shop Tailings
Yellowcake Precipitation	5.00E-10	Vanadium Circuit

4.1.2 Sampling Time

Calculate the sampling time required to detect 10% of the DAC by solving for sampling time in the following equation:

$$\frac{\text{LLD}}{(\text{Sampling Time}) (\text{Flow Rate of Sampler})} = 0.1 \text{ DAC}$$

For example:

To detect 10% of the DAC for U-Nat, a 40 lpm air sampler would have to operate 57 minutes, assuming the sample counter has a lower level of detection of 10 dpm above background, i.e.:

$$\frac{(10 \text{ DPM}) \left(\frac{\text{pCi}}{2.22 \text{ DPM}} \right) (E-6 \text{ } \mu\text{Ci})}{(X \text{ min.}) \left(\frac{40 \text{ lit}}{\text{min.}} \right) \left(\frac{10^3 \text{ ml}}{\text{lit}} \right)} = 2E-12 \frac{\mu\text{Ci}}{\text{ml}}$$

$$X = 56.8 \text{ minutes}$$

4.1.3 Dose Calculations (10 CFR 20.1201-20.1202)

1. Analytical results of airborne particulate samples may be obtained in several different units that need to be converted into mg soluble natural uranium to determine the weekly exposures and into uCi-hr/ml or WL-hr to determine annual exposures. The following table presents a summary of the conversions that may be necessary. The first row of the table presents the operations to be performed in the conversions. Enter the measured weight or activity, the sampler flow rate, the sampling time, and the exposure time into the first four columns. Divide the values in column 1 by the values in column 2 and column 3, and then multiply by the values in columns 4 and 5 to obtain the units in column 6, or:

$$\frac{(\text{Column 1}) (\text{Column 4}) (\text{Column 5})}{(\text{Column 2}) (\text{Column 3})} = \text{Column 6}$$

UNIT CONVERSION TABLE

1	2	3	4	5	6
OPERATION	DIVIDE	DIVIDE	MULTIPLY	MULTIPLY	ANSWER
MEASURED VALUE	SAMPLER FLOW RATE	SAMPLING TIME	EXPOSURE TIME	CONSTANT	ANSWER
µg soluble U-Nat	L/min	min	hrs	1.2	mg soluble U-Nat
pCi soluble U-Nat	L/min	min	hrs	1.77	mg soluble U-Nat
pCi gross alpha	L/min	min	hrs	E-9	µCi-hrs ML
µg U-Nat	L/min	min	hrs	6.77E-10	µCi-hrs ML
µCi mL Radon	---	---	hrs	E7	WL-hrs

For example:

$$\frac{(10 \text{ µg Soluble U-Nat}) (10 \text{ hrs}) (1.2)}{(2 \text{ L/min}) (30 \text{ min})} = 2 \text{ mg Soluble U-Nat}$$

See notes for a description of the unit conversions.

- The table on the following page is divided into four quadrants. Different quadrants are for soluble uranium, insoluble uranium, tailings dust, and radon. Select the proper quadrant for the type of airborne particulate being sampled. Enter the area, particulate concentration, and hours of exposure in the labeled columns of the selected quadrant.
- The protection factors are whole numbers, e.g., 10, 50, 1,000. Divide 1 by the protection factor and enter the quotient in the fourth column of each quadrant, e.g., for a protection factor of 1,000, enter 1/1,000 or 0.001 in the column. The 1/PF values are unit-less.
- Enter the product of the airborne concentration, the hours of exposure, the time, and 1/PF in the fifth column of each quadrant. Add these values and enter the total at the bottom of the column.
- On the dose calculations form which follows, enter the total for Soluble Uranium in the equation and calculate the corresponding mg. If a value exceeds 10 mg, an over-exposure may have occurred. If verified by a high uranium in urine results, an over-exposure has probably occurred and needs to be reported to the NRC.
- Enter the totals for Soluble Uranium, Insoluble Uranium, Tailings Dust, and Radon in their respective equations. Perform the indicated calculations, add the fractions

[illegible]

TOTAL	---	---	---		TOTAL	---	---	---	

DOSE CALCULATIONS (10 CFR 20.1201 + 20.1202)

Name	Soc. Sec. No.	Co. I.D. No.	Week	Year
Weekly Soluble Uranium	$\frac{(\mu\text{Ci-hr}) (1.77\text{E}9)}{(\text{mL})}$		=	_____ mg
		Limit		10 mg
Annual Soluble Uranium	$(\frac{\mu\text{Ci-hr}}{\text{mL}})$ (2000 hr) (5E-10)		=	_____
Annual Insoluble Uranium	$(\frac{\mu\text{Ci-hr}}{\text{mL}})$ (2000 hr) (2E-11)		=	_____
Annual Tailings Dust	$(\frac{\mu\text{Ci-hr}}{\text{mL}})$ (2000 hr) (*)		=	_____
* = DAC for Th-230 = 6E-12; <u>or</u> = DAC for tailings dust.				
Annual Radon with Daughters Present	$(\frac{\text{WL-hr}}{(\text{2000 hr}) (0.33 \text{ WL})})$		=	_____
		Subtotal		_____
		Limit		1
Deep Dose Equivalent = TLD Whole Body Dose in rem =				_____ rem
		Limit		5 rem
If the Deep Dose Equivalent is > 0.5 rem and the Subtotal is > 0.1, then				
Total Effective Dose Equivalent	= Deep Dose Equivalent	+ Committed Effective Dose Equivalent		
=	(_____ rem) + (5 rem) (_____	Subtotal)	=	_____ rem
		Limit		5 rem

DOSE CALCULATIONS (10 CFR 20.1201 + 20.1202)

Notes:μ

1. PF = Respiratory Protection Factor.
2. The 10 mg soluble uranium per week limit in 10 CFR Part 20.1201 is more restrictive than the (40 hour) (DAC) limit for natural uranium, thus compliance is based on 10 mg per week.
3. The conversion of uCi-hr/mL to mg natural uranium is the product of:

(air concentration) (hours of exposure) (breathing rate for light work)
(conversion of minutes to hours) (specific activity of natural uranium)
(conversion of ug to mg) which is:

$$\frac{(\mu\text{Ci-hr})}{\text{mL}} \frac{(2\text{E}4 \text{ mL})}{\text{min}} \frac{(60 \text{ min})}{\text{hr}} \left(\frac{\mu\text{g}}{6.77\text{E-}7 \mu\text{Ci}} \right) \frac{(\text{E-}3 \text{ mg})}{\mu\text{g}} =$$

$$\frac{(\mu\text{Ci-hr})}{\text{mL}} (1.77\text{E}9) = \text{mg U-Nat}$$

Thus to obtain mg natural uranium, multiply the μCi-hr/mL by 1.77E9.

4. Soluble Uranium DAC (Class D) = 5E-10 μCi/mL
Insoluble Uranium DAC (Class Y) = 2E-11 μCi/mL
Thorium-230 DAC (Class Y) = 6E-12 μCi/mL
Radon with Daughters DAC = 3E-8 μCi/mL = 0.33 WL
Tailings Dust DAC is a Site Specific Value = μ5. Description of unit conversions:

- a. ug soluble U-Nat → mg soluble U-Nat

$$\frac{\left(\frac{\mu\text{g}}{\text{L/min}} \right) (\text{min sampler}) (\text{E}3 \text{ mL})}{\text{L}} \frac{(\text{E-}3 \text{ mg})}{\mu\text{g}} \frac{(60 \text{ min})}{\text{hr}} (\text{hr exposure}) =$$

$$\frac{\left(\frac{\mu\text{g}}{\text{L/min}} \right) (\text{min sampler}) (\text{hr exposure}) (1.2)}{(\text{L/min}) (\text{min sampler})} = \text{mg soluble U-Nat}$$

- b. pCi soluble U-Nat → mg soluble U-Nat

$$\left(\frac{\text{pCi}}{\text{L/min}} \right) \left(\frac{\text{min}}{\text{sampler}} \right) \left(\frac{\text{E-9 mCi}}{\text{E3 mL}} \right) \left(\frac{\text{mg}}{\text{pCi}} \right) \left(\frac{2\text{E4 mL}}{6.77\text{E-7 mCi}} \right) \rightarrow$$

$$\left(\frac{60 \text{ min}}{\text{hr}} \right) (\text{hr exposure}) =$$

$$\left(\frac{\text{pCi}}{\text{L/min}} \right) (\text{hr exposure}) (1.77) = \text{mg soluble U-Nat}$$

c. pCi gross alpha → μCi-hr

$$\left(\frac{\text{pCi}}{\text{L}} \right) \left(\frac{\text{min}}{\text{sampler}} \right) \left(\frac{\text{E-6 μCi}}{\text{E-3 mL}} \right) (\text{hr exposure}) =$$

$$\left(\frac{\text{pCi}}{\text{L}} \right) (\text{hr exposure}) (\text{E-9}) = \frac{\text{μCi-hr}}{\text{mL}}$$

d. μg U-Nat → μCi-hr
mL

$$\left(\frac{\text{μg}}{\text{L}} \right) \left(\frac{\text{min}}{\text{sampler}} \right) \left(\frac{\text{E3 mL}}{\text{L}} \right) (6.77\text{E-7 μCi}) (\text{hr exposure}) =$$

$$\left(\frac{\text{μCi}}{\text{L}} \right) (\text{hr exposure}) (6.77\text{E-10}) = \frac{\text{μCi-hr}}{\text{mL}}$$

e. μCi of Radon-222 → WL
mL

$$\left(\frac{\text{μCi}}{\text{mL}} \right) \left(\frac{\text{E6 pCi}}{\text{μCi}} \right) \left(\frac{\text{E3 mL}}{\text{L}} \right) \left(\frac{\text{L-WL}}{\text{E2 pCi}} \right) =$$

$$\left(\frac{\text{μCi}}{\text{mL}} \right) (\text{E7}) = \text{WL}$$

4.2 Personnel Exposure Files

The Company will generate and maintain individual exposure records for each employee that works at the White Mesa Mill. The record system will be designed to meet the specifications of the Federal Code of Regulations 10 CFR Part 20.

When an employee is hired, a file will be generated specifically for that individual. All records that are to be in the radiation exposure file will be maintained during the term of employment. When the employee terminates, all records will be preserved until the NRC authorizes their disposition.

Personnel exposure records will be maintained at the mill site and will be accessible only to the employee and the Radiation Safety staff. No copy of the exposure history will be furnished to anyone outside of the Radiation Safety Department without a signed consent form from the employee.

Contents of the exposure file:

Each personnel exposure file will contain the following records:

1. Information Sheet – Each information sheet will include the following information:
 - A. Employee's full name
 - B. Birth date
 - C. Social Security number
 - D. Date of hire
 - E. Date of termination
2. Record of Urinalyses – A multiple entry log of all urinalyses conducted at this work site will include the following information:
 - A. Employee's full name
 - B. Sample dates
 - C. Sample identification number
 - D. Concentration of uranium in $\mu\text{g/l}$
 - E. An entry for any quality assurance "spikes" entered in $\mu\text{g/l}$
3. Internal personnel Exposure Records – These will be calculated and prepared using the forms above or by the computer and the printout will be used as the permanent record in the exposure file. The internal exposure records will contain the following information:
 - A. Employee's full name
 - B. Social Security number

- C. Birth date
 - D. Exposure to airborne uranium expressed in both μCi and percent MPC
 - E. Any breathing zone samples collected for airborne uranium to be expressed in μCi
 - F. Radon daughters expressed in working levels (WL) and period of exposure (date)
4. External Exposure Record (OSL, Dosimeter) – The data received from the Dosimeter contractor will be posted to the Dosimeter record in the exposure file. The following information will be included on the Dosimeter record:
- A. Employee's full name
 - B. Birth date
 - C. Social Security number
 - D. Period of exposure (dates)
 - E. Exposure in millirems (mrem) for a given period
 - F. Total accumulated exposure while at the White Mesa Mill
 - G. Identification number of the Dosimeter badge
5. Record of Exposure from Previous Employment (NRC form 4 or similar) – A record of occupational exposures that occurred prior to employment at the mill must be obtained for each employee. If no such exposure record is available, the employee must sign a statement to that effect. If previous exposure records were kept, a copy must be secured and placed in the individual's file.
6. Reports of Over-exposure – If an individual has been found to be over-exposed, the RSO will draft a letter of explanation. The report will explain the circumstances and/or reasons for the over-exposure. It will also state any actions taken to correct the problem or to prevent future over-exposures. The report must be placed in the individual's exposure file.

5. RADIATION WORK PERMITS

5.1 General

A Radiation Work Permit (“RWP”) system has been established for non-routine activities where there is a potential for a significant radiation exposure, or for certain routine activities where there is a potential to spread radioactive materials.

Specifically, an RWP is required for:

- a) All non-routine maintenance work, or work for which there is no effective procedure, which may, by the determination of the RSO, exceed 25% of the R313-15 limits;
- b) All routine work, not covered by an procedure, that could involve the spread of radioactive materials; and
- c) The receipt, handling or processing of any alternate feed material or other radioactive material, which has been determined by the RSO, not to fall within an existing operating procedure.

An RWP may also be used on a temporary basis for routine activities in lieu of an procedure, while a procedure is being developed for the activity.

5.2 All Non-Routine Activities Require RSO Review

All non-routine activities require review by the RSO. The RSO will advise the Mill Manager on a regular basis of any activities that require an RWP.

5.3 Radiation Work Permit

The RWP is a form that describes the work to be performed, the location, duration and personnel involved, and the radiological controls needed, such as respirator, urine samples, breathing zone monitoring, time limitations for the activity, etc. The form must also have an area for the RSO, or his designee’s, signature. A copy of a form of RWP is attached.

5.4 Procedure for Obtaining a Radiation Work Permit

The procedure for obtaining an RWP is:

- a) When RWP-type work is to be performed, the Shift Foreman, Maintenance Superintendent or other supervisory personnel shall complete the top portion of the RWP, which will provide information on the specific work locations,

estimated work duration, type of work to be performed, and personnel utilized, and present it to the RSO;

- b) The RSO will indicate the radiological controls needed based on the information given and the safety of personnel. The RSO or his designee will provide the necessary surveillance and respiratory protection equipment;
- c) No work can be performed until the RSO or his designee has approved the RWP;
- d) Any maintenance or RWP jobs done in the yellowcake dryer or packaging enclosures will require a member of the Radiation Staff to be present for the duration of the job;
- e) All supervisors will be given training in and copies of the requirements for using RWPs, with the permits remaining on file for five years; and
- f) Any supervisor found to be knowingly and willfully violating these procedures will be issued a written warning, and the situation will be reviewed by appropriate management for remedial action.

EMPLOYEE SPOT ALPHA CONTAMINATION SURVEY

DATE	NAME	BOOTS	CLOTHES	HANDS	COMMENTS

Alpha Instrument Information:

Instrument Model: _____

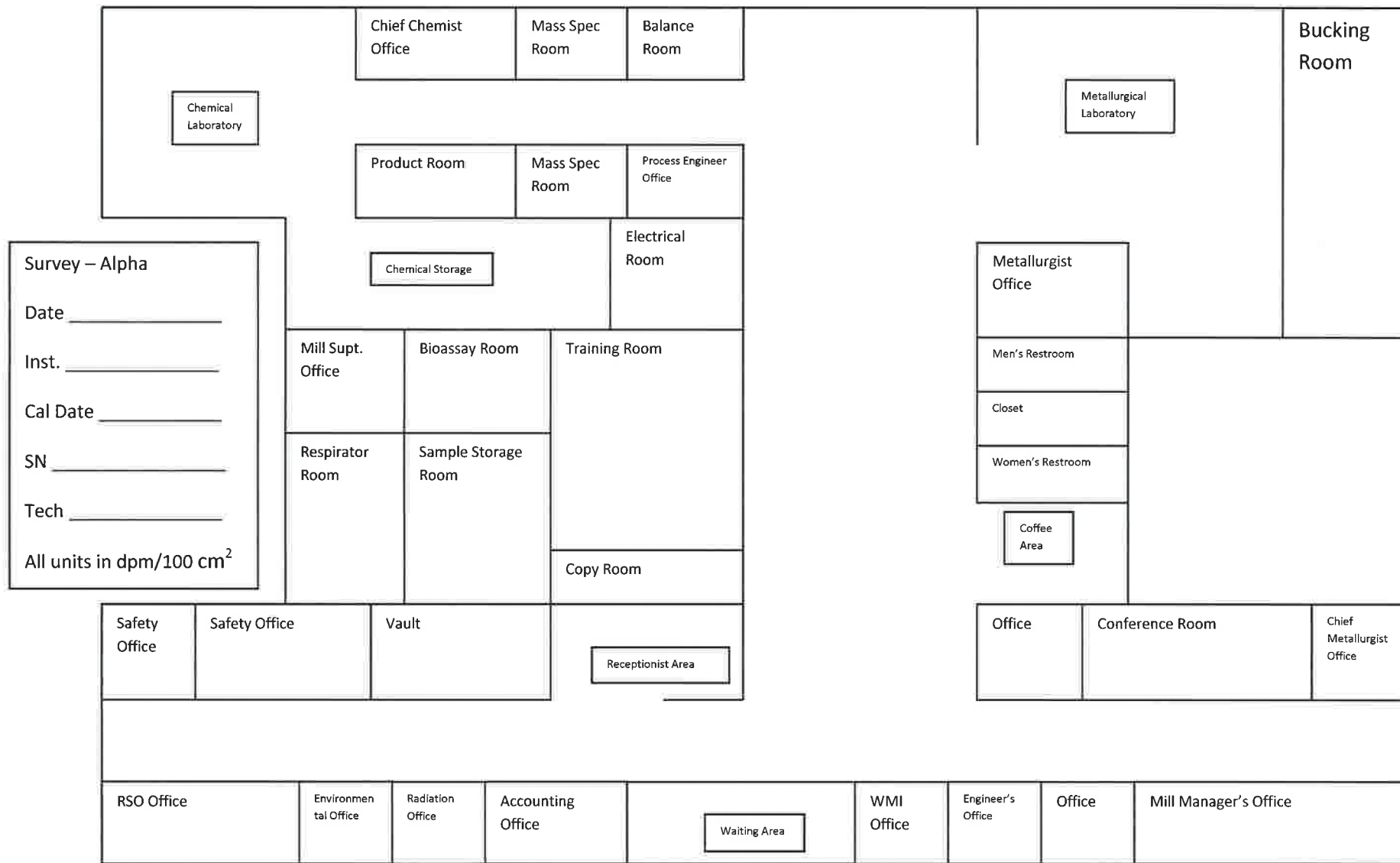
Instrument SN: _____

Th₂₃₀ Source SN: _____

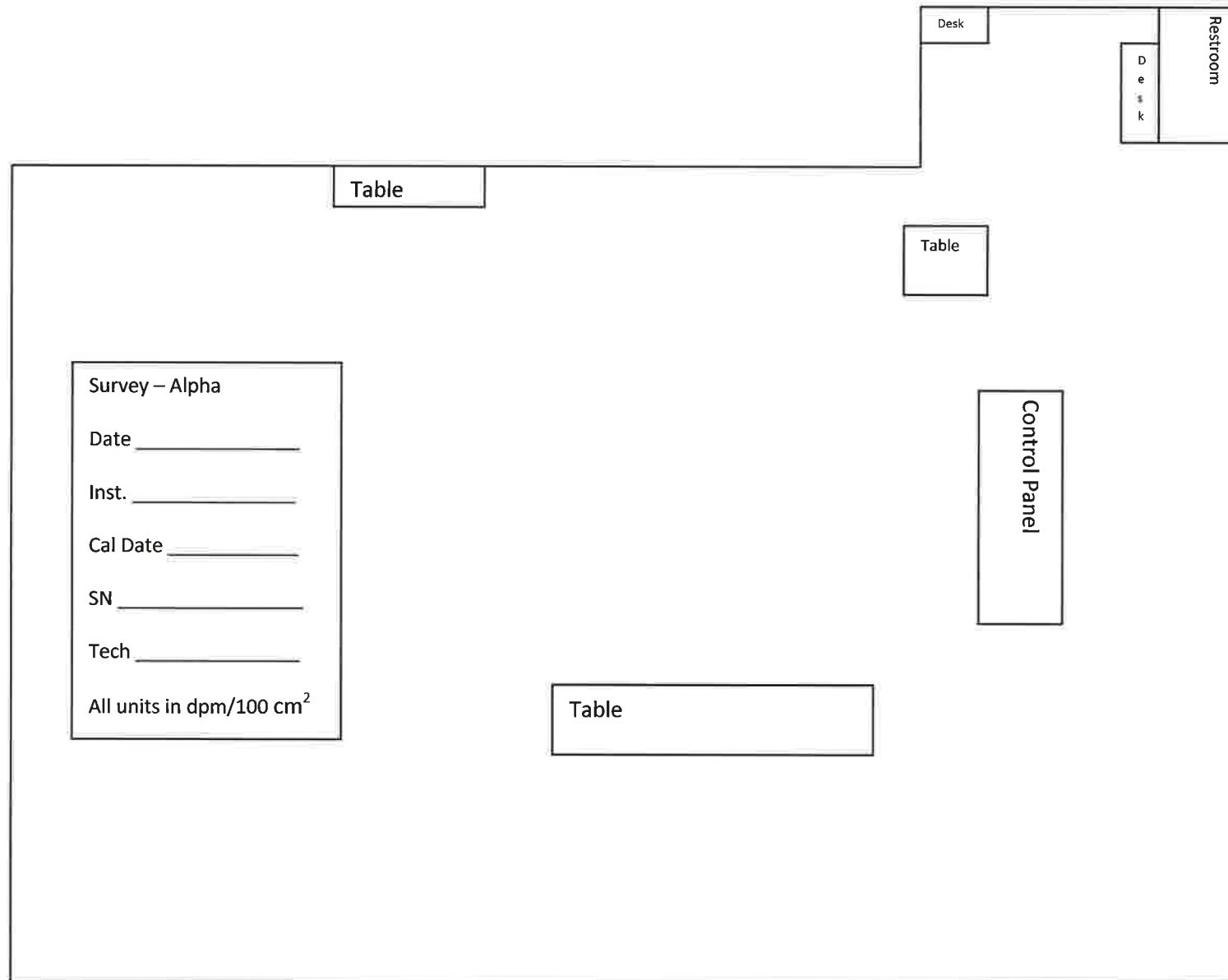
DPM: _____ CPM: _____

Efficiency: _____ Efficiency Factor: _____

Administration Building



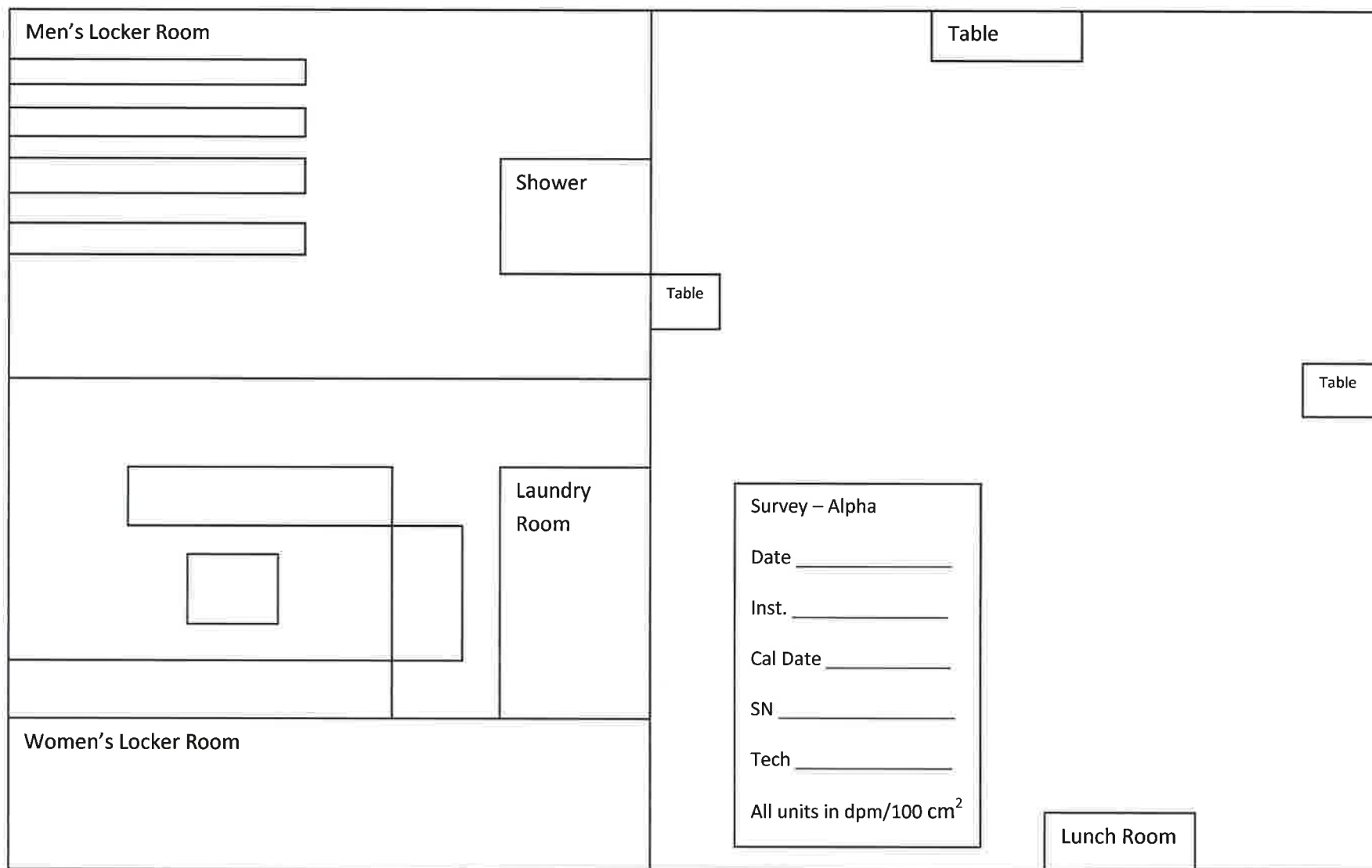
Central Control Room



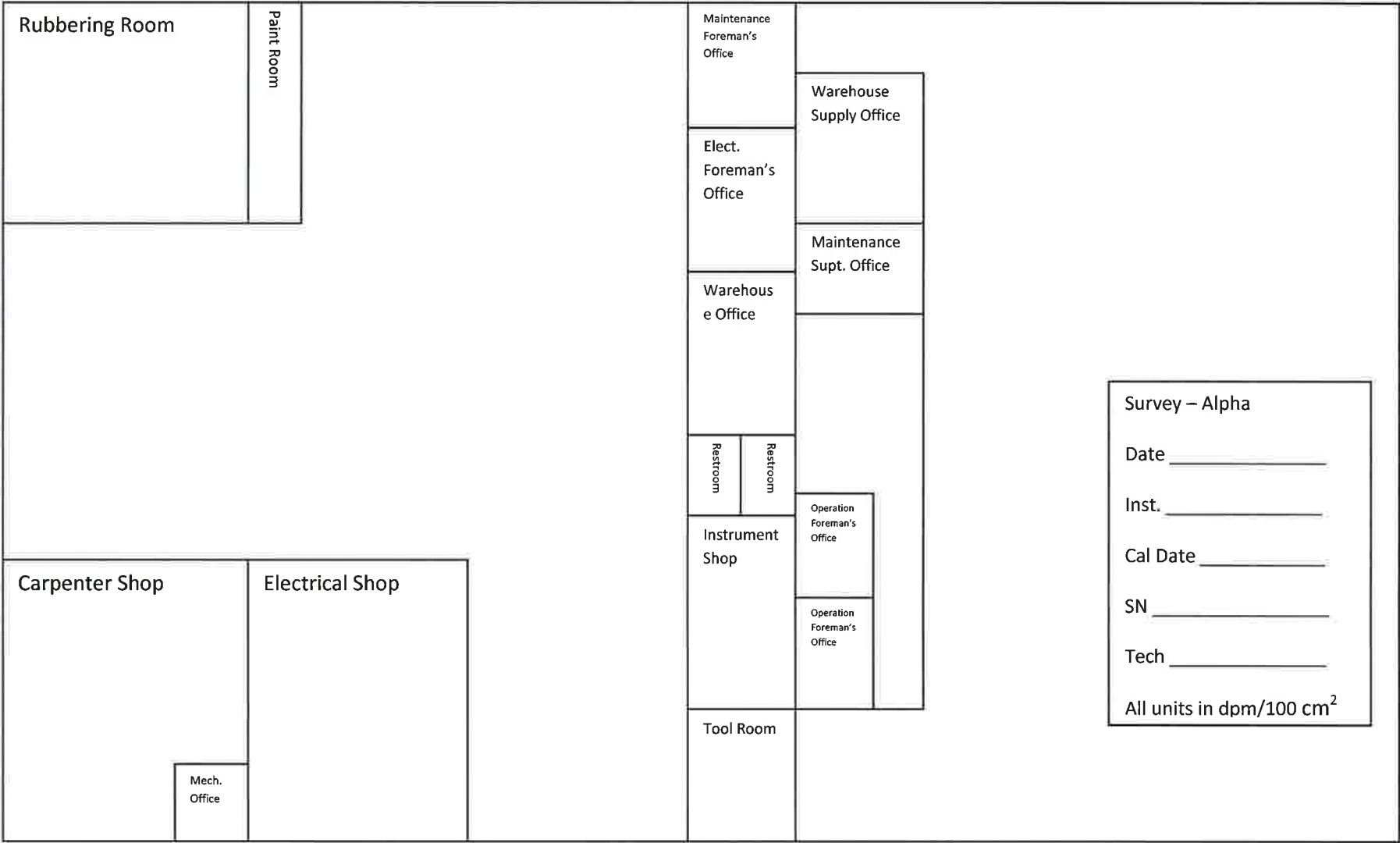
Scalehouse

<div data-bbox="195 440 537 631">Desk</div>	<div data-bbox="646 207 978 743">Restroom</div>	<div data-bbox="1098 207 1581 391">Table</div>	<div data-bbox="1780 412 1974 959">Table</div>
<div data-bbox="1077 946 1440 1398"><p>Survey – Alpha</p><p>Date _____</p><p>Inst. _____</p><p>Cal Date _____</p><p>SN _____</p><p>Tech _____</p><p>All units in dpm/100 cm²</p></div>			

Change/Lunch Room



Maintenance and Warehouse Areas



SX Building

Survey – Beta/Gamma

Date _____

Inst. _____

Cal Date _____

SN _____

Tech _____

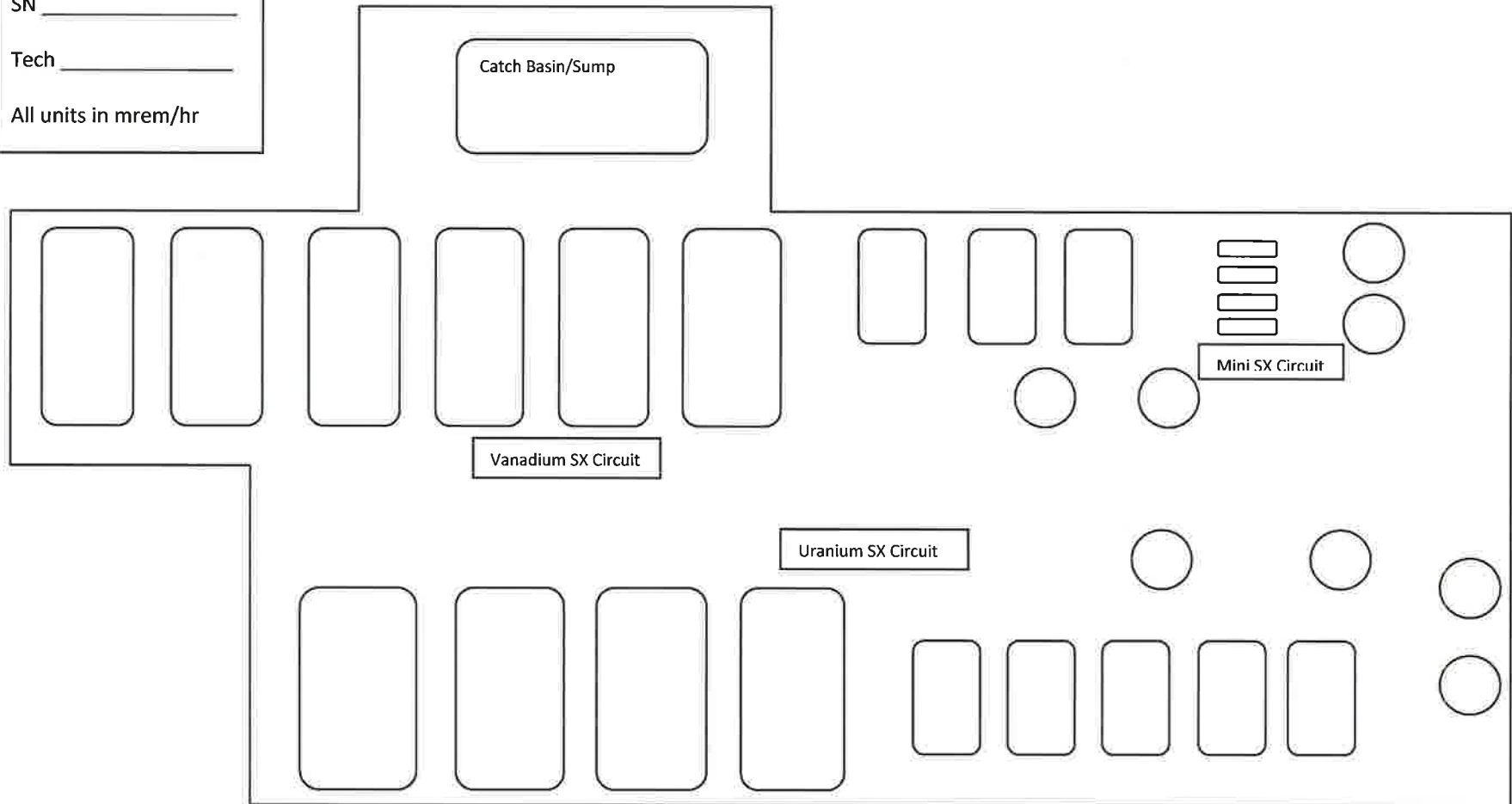
All units in mrem/hr

Catch Basin/Sump

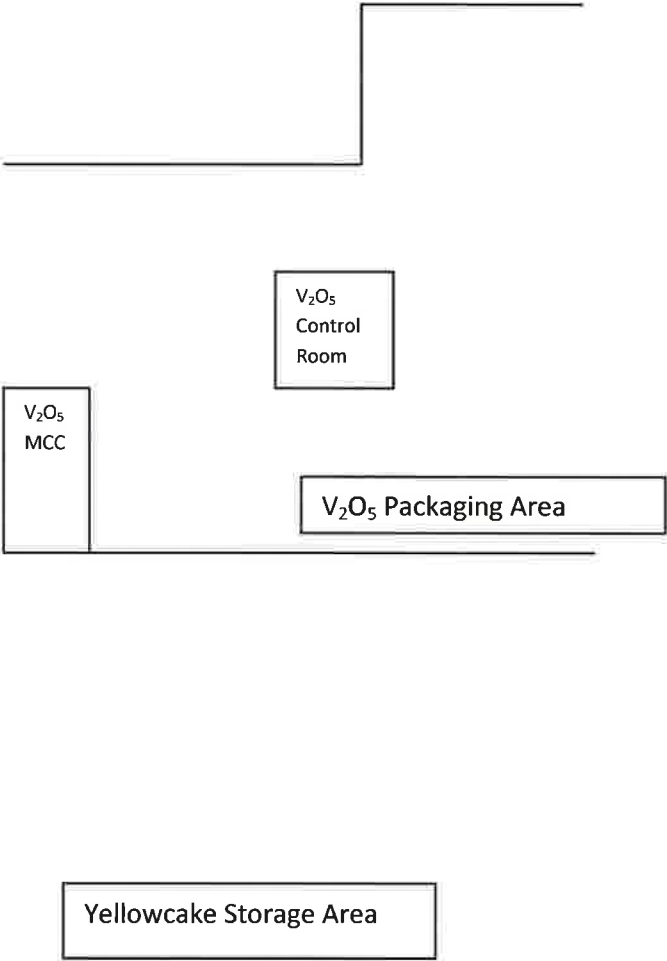
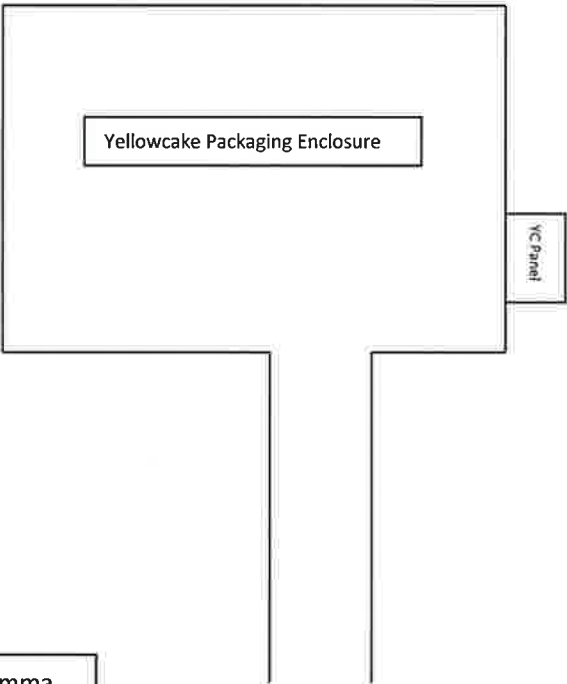
Vanadium SX Circuit

Uranium SX Circuit

Mini SX Circuit



Product Packaging Areas



Survey – Beta/Gamma

Date _____

Inst. _____

Cal Date _____

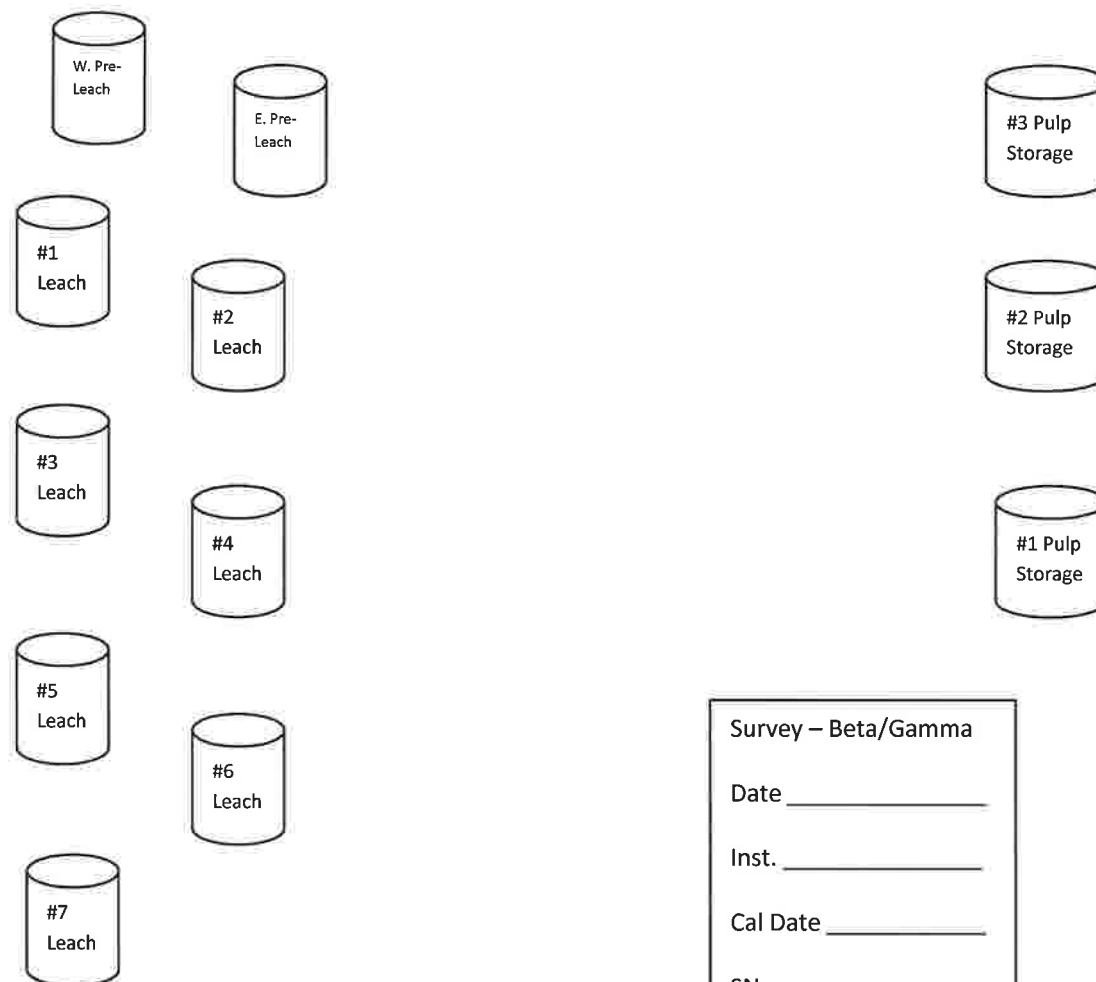
SN _____

Tech _____

All units in mrem/hr

SAG Mill/Leach Areas

Old Shifter's Office
Old Operator's Lunch Room



Survey – Beta/Gamma
Date _____
Inst. _____
Cal Date _____
SN _____
Tech _____
All units in mrem/hr

Emergency Generator Building

Survey – Beta/Gamma

Date _____

Inst. _____

Cal Date _____

SN _____

Tech _____

All units in mrem/hr

Emergency Generator

CCD/Precipitation Circuits

Survey – Beta/Gamma

Date _____

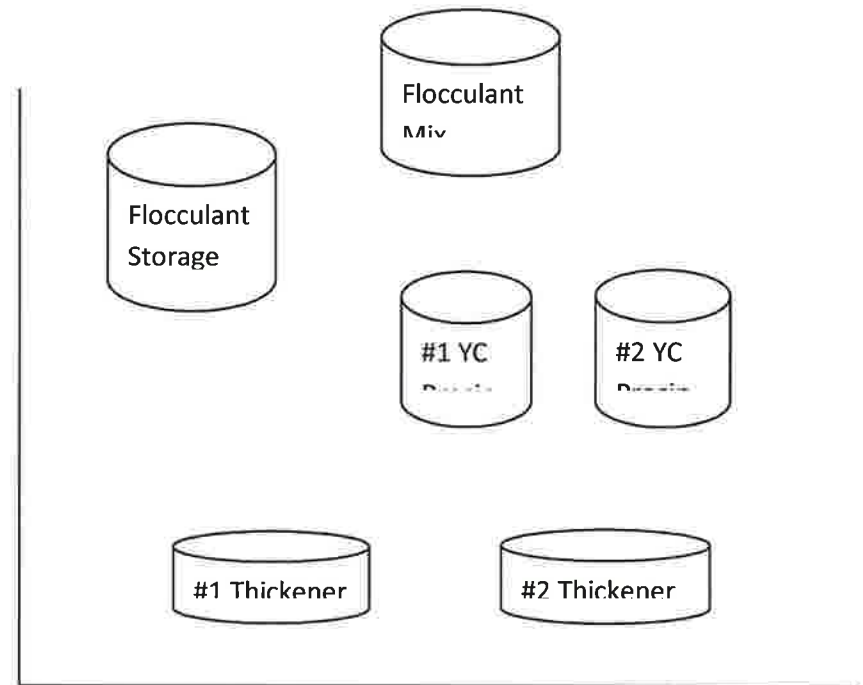
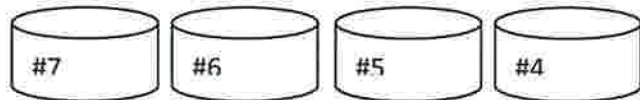
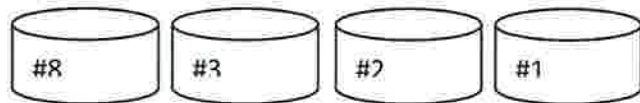
Inst. _____

Cal Date _____

SN _____

Tech _____

All units in mrem/hr



Uranium Packaging Circuit Upper Levels

Survey – Beta/Gamma

Date _____

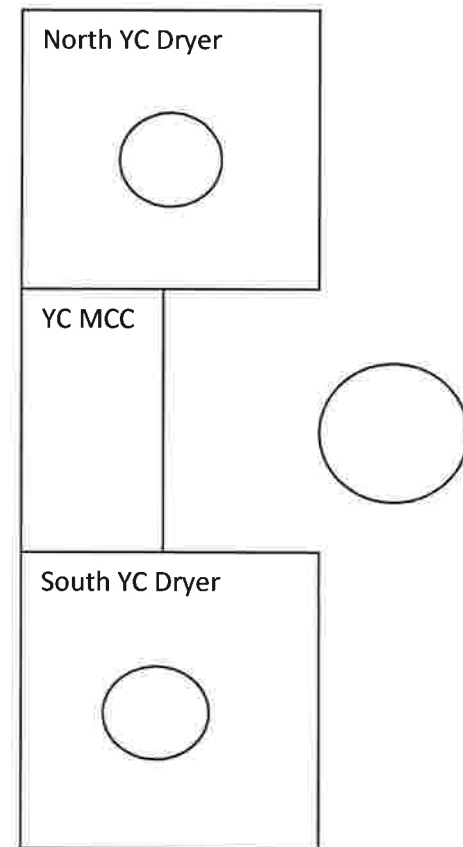
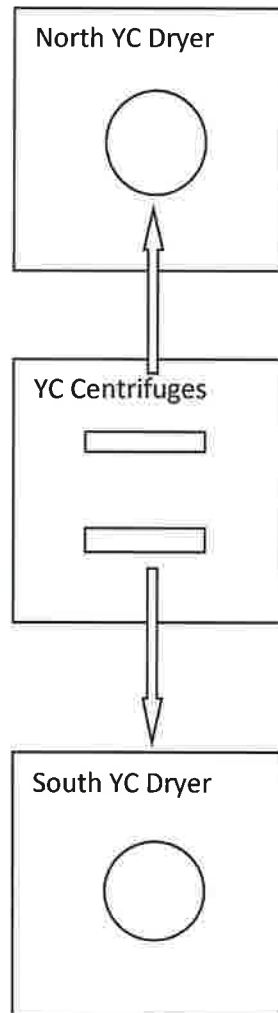
Inst. _____

Cal Date _____

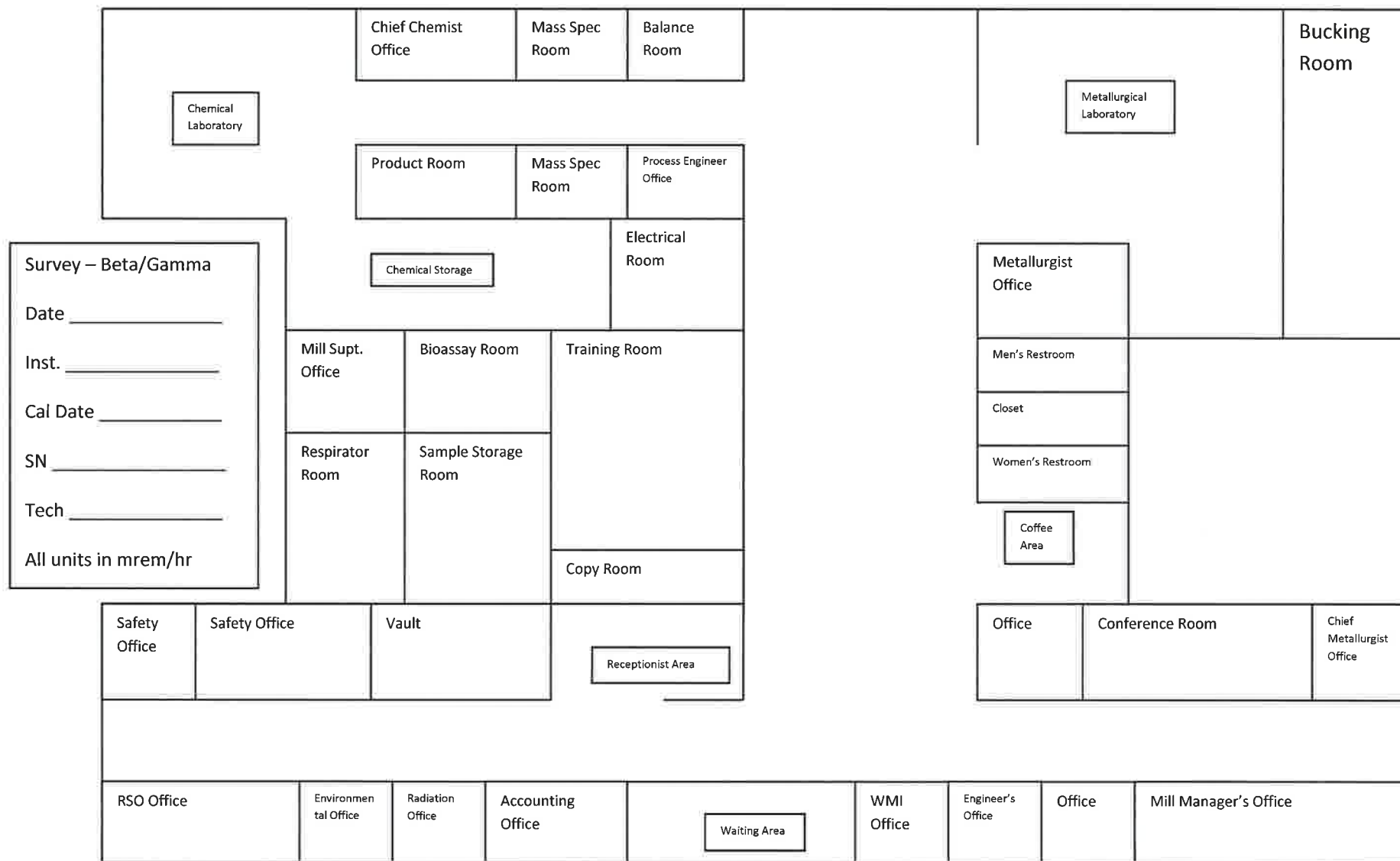
SN _____

Tech _____

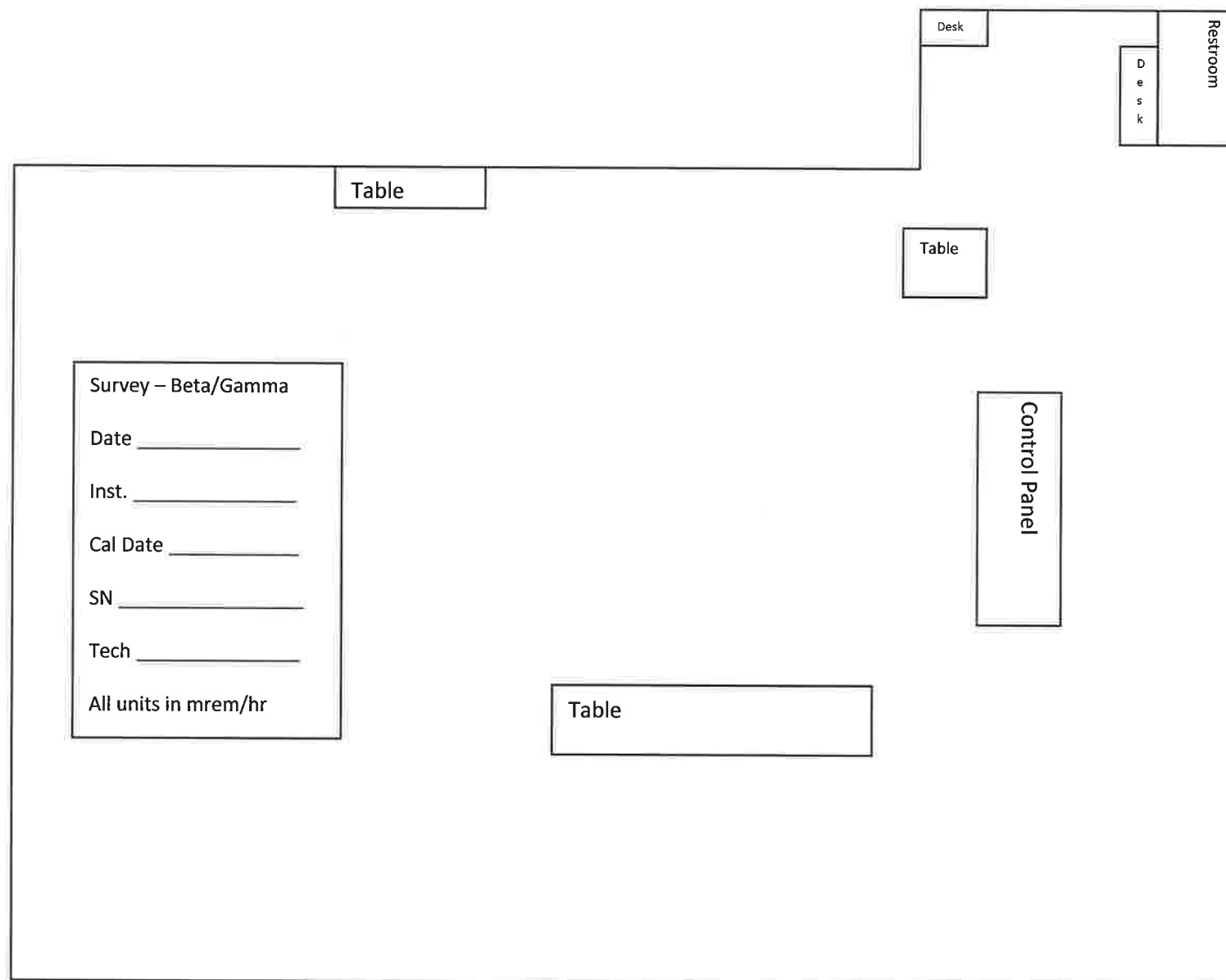
All units in mrem/hr



Administration Building



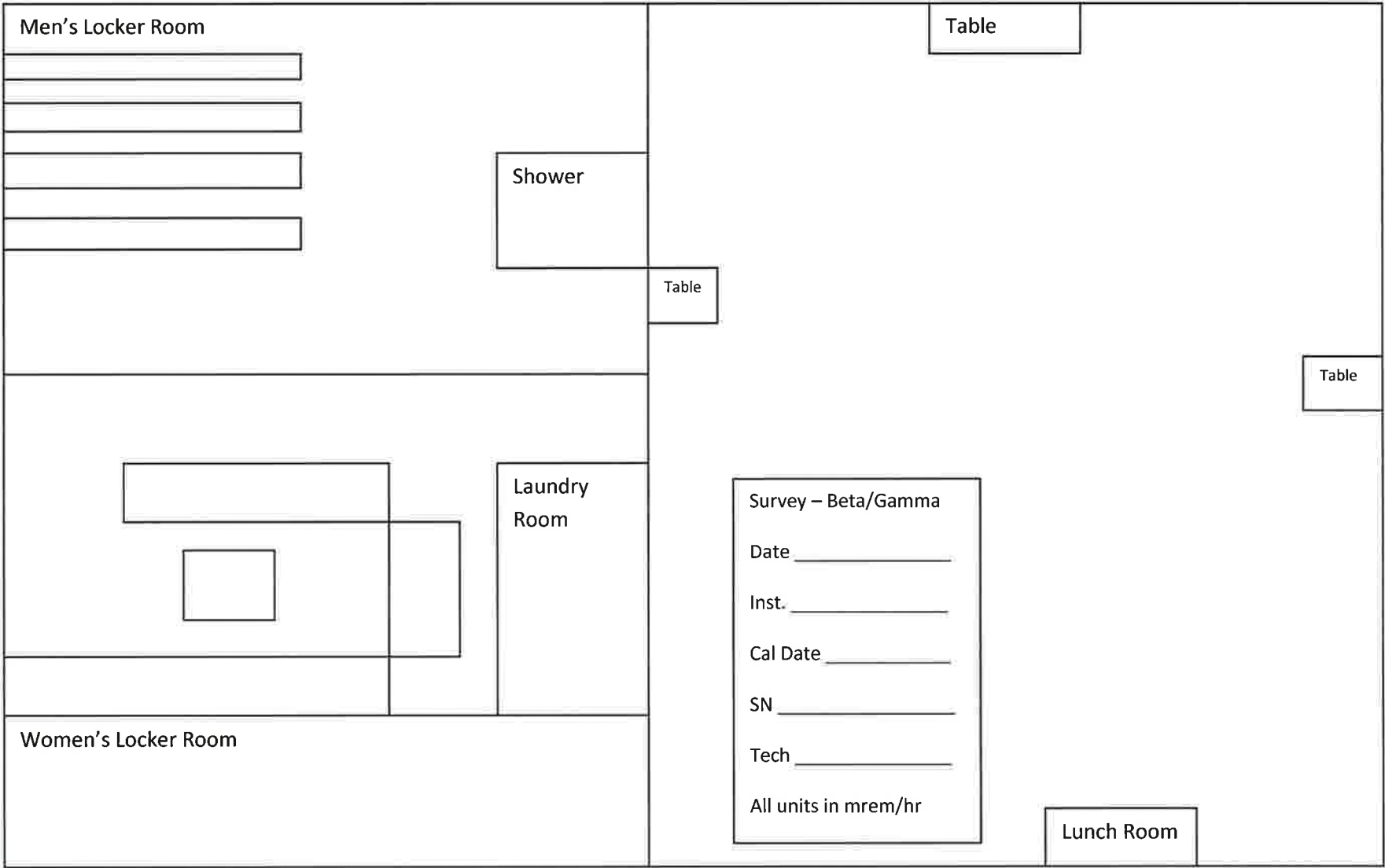
Central Control Room



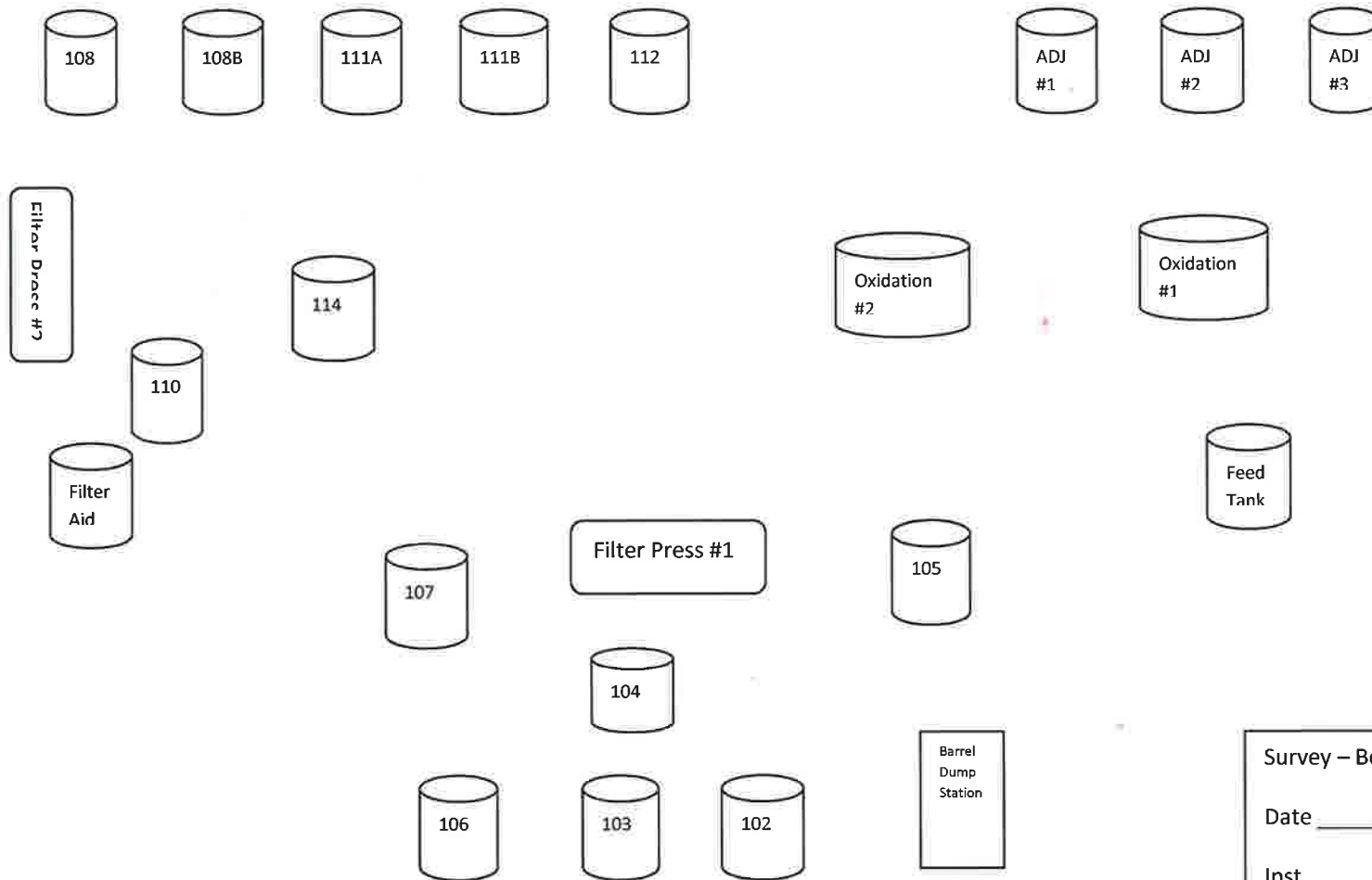
Scalehouse

	Restroom	Table	
Desk			Table
		<div data-bbox="1079 948 1442 1398"><p>Survey – Beta/Gamma</p><p>Date _____</p><p>Inst. _____</p><p>Cal Date _____</p><p>SN _____</p><p>Tech _____</p><p>All units in mrem/hr</p></div>	

Change/Lunch Room



Alternate Feed Circuit



Survey – Beta/Gamma

Date _____

Inst. _____

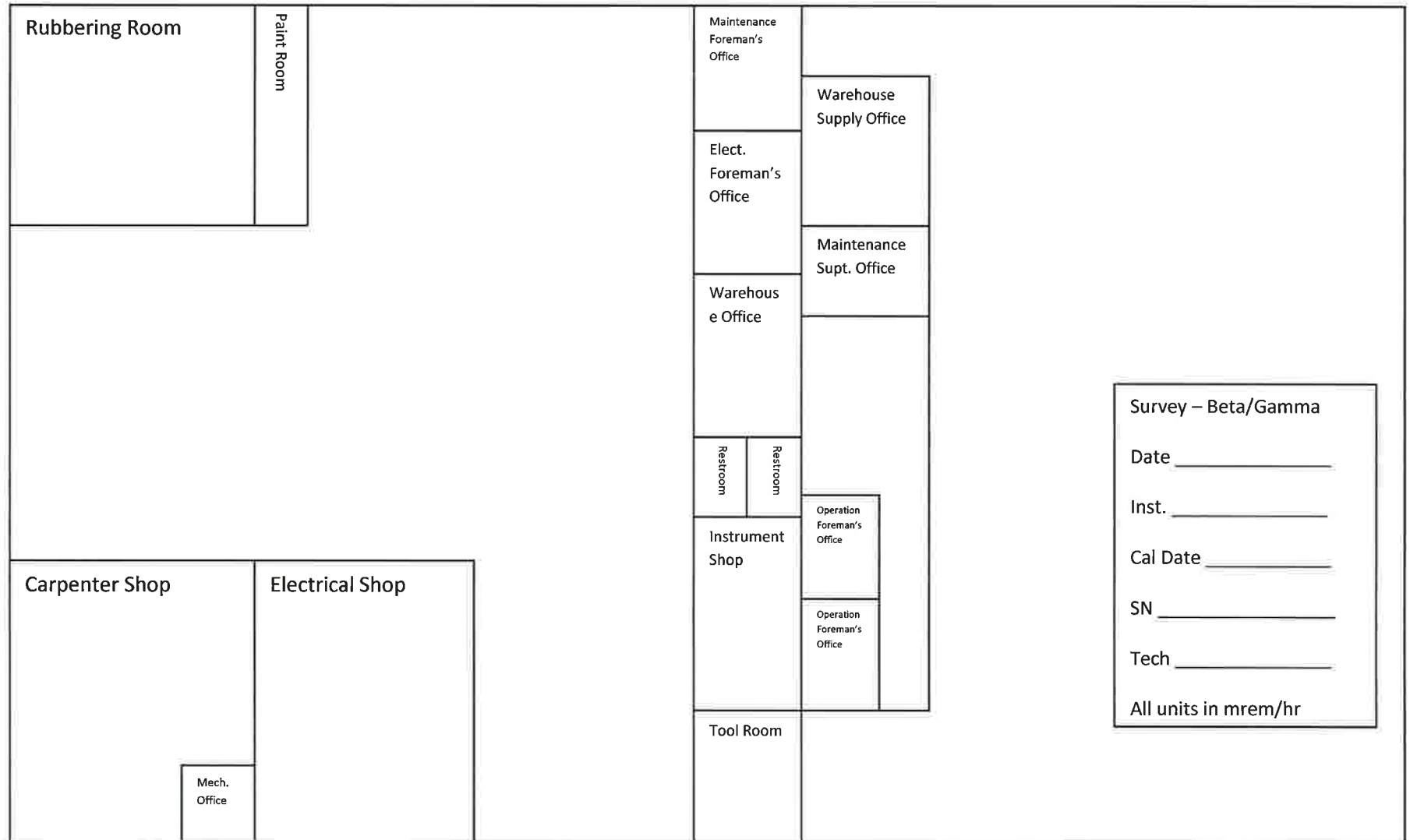
Cal Date _____

SN _____

Tech _____

All units in mrem/hr

Maintenance and Warehouse Areas



Monthly Beta-Gamma Survey

Date: _____

Technician: _____

Function Check of Survey Instrument

Model #: _____

Serial #: _____

Calibration: _____

Source: _____

Source #: _____

Reading mrem/hr: _____

All units are in mrem/hr.

RSO Reviewed: _____

RSO Comments: _____

Feedstock Areas

Feedstock Source	Reading

Survey – Beta/Gamma

Date _____

Inst. _____

Cal Date _____

SN _____

Tech _____

All units in mrem/hr

Tails Area

Survey – Beta/Gamma

Date _____

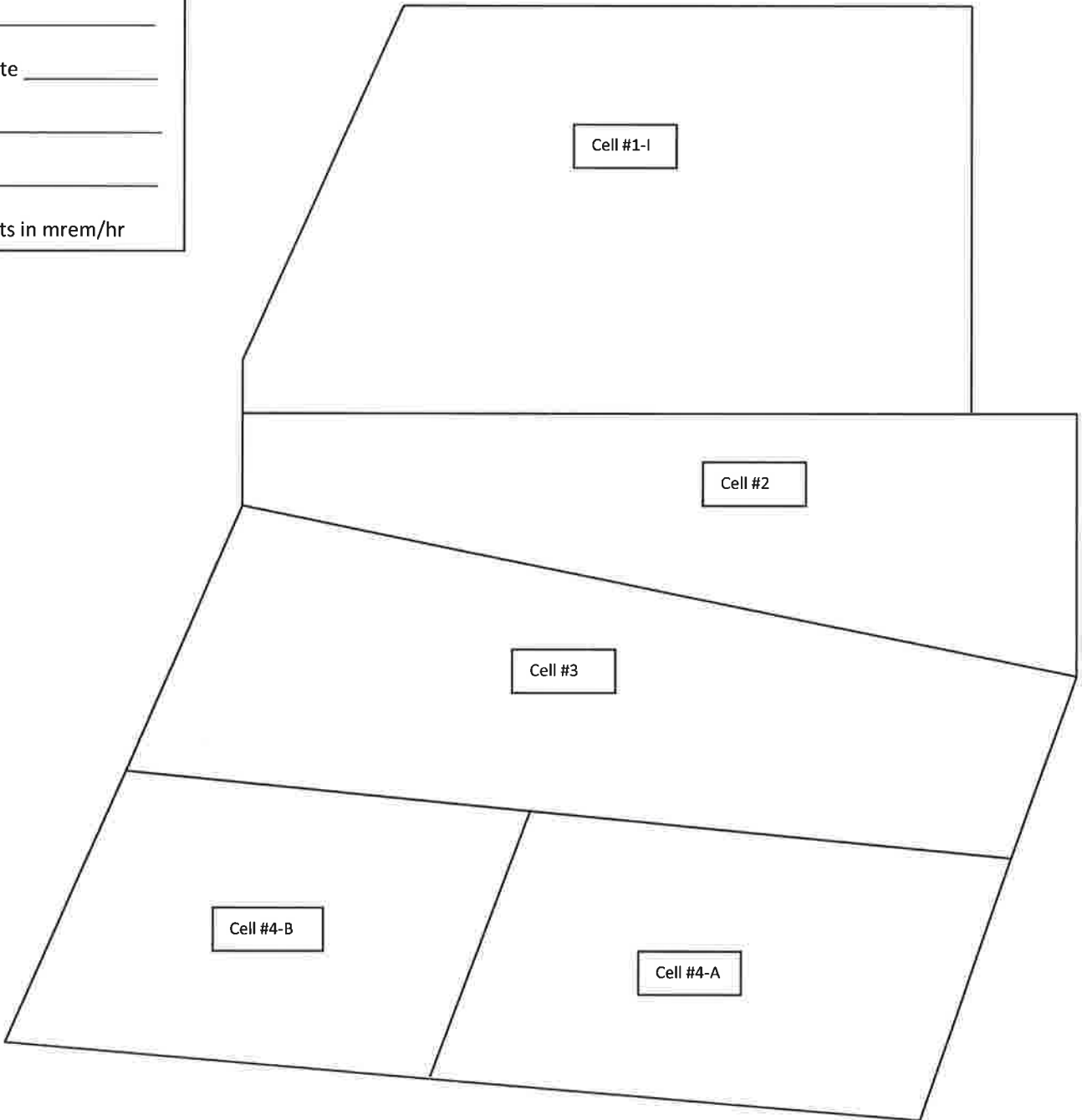
Inst. _____

Cal Date _____

SN _____

Tech _____

All units in mrem/hr



White Mesa Mill Weekly Alpha Survey

Date: _____

Technician: _____

Alpha Survey Instruments

Fixed

Model #: _____

Serial #: _____

Calibration: _____

Efficiency: _____

Factor: _____

Background: _____

MDA: _____

Removable

Model #: _____

Serial #: _____

Calibration: _____

Efficiency: _____

Factor: _____

Background: _____

MDA: _____

Notes:

All fixed readings are in dpm/100 cm²

T or t = Total or Fixed Alpha Reading in dpm/100 cm²

R or r = Removable Alpha Reading per swipe or filter (approximately 100 cm²)

RSO Reviewed: _____

RSO Comments: _____

Energy Fuels Resources (USA) Inc.
White Mesa Mill
Radiation Survey of Equipment Released for Unrestricted Use

All equipment or material released from the White Mesa Mill to an unrestricted area must be surveyed for release in accordance with the following procedure.

1. Monitor for Gross alpha contamination with the appropriate survey meter.
2. If calculated assay exceeds 1,000 dpm/100cm², then perform swipe analysis at applicable points.
3. Decontaminate if a removable alpha exceeds 1,000 dpm/100cm² or fixed alpha exceeds 5,000 dpm/100cm².
4. Release equipment or material if alpha contamination and Beta-Gamma levels are below the following limit:

Removable alpha – 1,000 dpm/100cm²
Fixed alpha- 5,000 dpm/100cm² average
15,000 dpm/100cm² maximum

Beta-Gamma- 0.2 mr/hr @ 1cm average
1.0 mr/hr @ 1cm maximum

Released from White Mesa Mill to: _____

Released by (print name): _____ Signature: _____

Date: _____

List of Equipment	Total Alpha dpm/100cm ²	Removable Alpha dpm/100cm ²	Beta/Gamma mr/hr
1.			
2.			
3.			
4.			
5.			

Instrument Function checks

Alpha Meter:
Inst. Model _____ SN _____
Th-230 Source SN _____
dpm _____ cpm _____ eff _____
Efficiency Factor _____
Cal. Date: _____
Bkg _____
MDA _____

Beta-Gamma Meter:
Inst. Model _____ SN _____
Cs-137 Source SN _____
Inst. Response _____
Cal. Date: _____

Removable Alpha:
Inst. Model _____ SN _____
Th-230 Source SN _____
dpm _____ cpm _____ eff _____
Efficiency Factor _____
Cal. Date: _____

Was a copy of this document offered to the recipient? Yes or No Signature of recipient _____

Comments: _____
