



State of Utah

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Department of  
Environmental Quality

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DIVISION OF WASTE MANAGEMENT  
AND RADIATION CONTROL  
Scott T. Anderson  
*Director*

November 29, 2016

Corey Dias, Chief Executive Officer  
Anfield Resources Holding Corp.  
P.O. Box 901537  
Sandy, UT 84090

RE: Radioactive Material License Renewal Application  
Completeness Review

Dear Mr. Dias:

The Division of Waste Management and Radiation Control has completed its review of the Radioactive Material License (RML) Renewal Application for the Shootaring Canyon Uranium Mill submitted on June 30, 2016 by Anfield Resources Inc. The review documented missing information which is summarized in this letter.

**Submitted Information**

- License Renewal Application.
- Exhibit A.1, 2008 Environmental Report.
- Exhibit A.2, 2003 NRC Environmental Assessment.
- Exhibit A.3, Second Half 2015 Effluent Monitoring Report.
- Exhibit A.4, Annual 2015 Groundwater Monitoring Plan.
- Exhibit A.5, Current Groundwater Discharge Permit UGW170003.
- Exhibit B.1, Final Draft of the Tailings Storage Facility Design Report (Volumes 1 and 2).
- Exhibit B.2, Tailings Storage Facility Technical Specifications and QA/QC Plan;
- Exhibit B.3, Compliance Monitoring Plan.
- Exhibit B.4, Preliminary Draft Reclamation and Decommissioning Plan.
- Exhibit B.11, Definitive Cost Estimate for the Restart of Shootaring Canyon Mill.
- 2nd, 3rd, and 4th Round Interrogatory Responses.

DRC-2016-011532

195 North 1950 West • Salt Lake City, UT  
Mailing Address: P.O. Box 144880 • Salt Lake City, UT 84114-4880  
Telephone (801) 536-0200 • Fax (801) 536-0222 • T.D.D. (801) 903-3978  
[www.deq.utah.gov](http://www.deq.utah.gov)

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## **Information to be Submitted**

In addition to the application and exhibits listed above, the Division recognizes that many components of the application will be submitted in the future. Below are the components that Anfield has committed to submit at later dates.

- Exhibit B.5, Groundwater Monitoring Sampling and Analysis Plan and QA Plan, to be submitted April 28, 2017.
- Exhibit B.6, Handbook of Radiological and Environmental Monitoring Procedures, to be submitted May 31, 2017.
- Exhibit B.7, Radiological Emergency Action Plan, to be submitted May 31, 2017.
- Exhibit B.8, Radiological Safety Training Manual, to be submitted May 31, 2017.
- Exhibit B.9, Respiratory Protection Program, to be submitted May 31, 2017.
- Exhibit B.10, Fire Safety Program, to be submitted May 31, 2017.
- Exhibit B.12, Mill Restoration Design Report, to be submitted September 25, 2017.

Sections with outstanding supplementary information to be submitted and corresponding submittal dates:

- Exhibit A.1 2008, Environmental Report - Transportation Impact Analysis, to be submitted November 24, 2016.
- Exhibit B.3, Compliance Monitoring Plan - Air Monitoring Program and QA/QC Program, to be submitted April 28, 2017.
- Exhibit B.4, Reclamation and Decommissioning Plan - Tailings Closure Grading and Quantities; Cover Infiltration Analysis; Tailings Seepage/Settlement Analyses; Slope Stability and Cover Cracking Analyses; Surface Water Management and Erosion Protection; Mill Decommissioning Plan; Tailings Dewatering and Settlement Monument Plan; Cost Estimate for Surety; Technical Specifications; Construction Quality Assurance/Quality Control Plan, to be submitted December 14, 2016.

## **Missing Information**

Information missing from the application is summarized in the table below. Comments are included for clarification.

Page	Section	Comment
13	2.5.1.3	Reference to Figure 3-4. This figure is not available. It is possible that the correct reference is Figure 2-9.
16	2.5.1.3	Reference to Table 3-6. This table is not available.
21	2.6.1.3	In the narrative, Figure 2-1 is referenced as a reproduced map showing the joint orientations and dips in the drainage hosting the tailings impoundment. It does not look like this is represented in the referenced figure.
23	2.6.2	An earthquake with an epicenter 21 miles to the northwest of the facility is discussed in the narrative. This earthquake is not listed in the Table 2.6-2 (Earthquakes reported between 1937 and June 2016 with magnitudes of 3.5 and greater within a 200-mile radius).
26	2.8.1	The paragraph discusses Wells T4 to T6. These wells are not given on Figure 1-2 or Figure 2-3.

38	4.2.1	Figure 4-1 is referenced in the narrative. This figure is not available. Should this be Figure P4-1?
47	6.0.2.6.1.3	The narrative of the document seems to only describe operational monitoring. Table 6.1-3 describes the interim monitoring program. Also, the final sentence of the paragraph indicates that the interim program is included in parentheses. Are statements included in the narrative that describes the interim program? It seems that they are only described in the table. The excess discussion of the interim program in the narrative is confusing, if it is simply described in the table.
63-65	7.2	The narrative discusses a new monitoring network (page 63-65). However, Table 6.1-8 lists the radiological monitoring wells. The purpose of these wells is unclear. The table is not referenced in the narrative.

### **Missing References**

Many of the referenced documents were located in the Division files for Shootaring Canyon Uranium Mill or the submitted application. Those that have not been located are listed below. Please indicate their location in the application (i.e. inclusion in a reference in an exhibit) or provide the Division with a copy for review.

- Cook and Smith (1976)
- DOC (undated)
- Hydro-Engineering (1999)
- ICF Kaiser Engineers (1992)
- Mathis (2000)
- Morton (1984)
- NRC (1997)
- Plateau Resources (1998a)
- Plateau Resources (2006)
- Tetra Tech (2008a, b, and C)
- Texas (2003)
- URS (2007)
- U.S. Department of Energy (1989)
- Waugh (1997)

### **Requested Information and Response Table**

In order to easily determine the status of previously and currently requested information and to prevent requesting information previously requested, please provide a summary table showing the fate of all requested information. For example, please show in the table where information from each of the interrogatories is located in the updated application and show when information is no longer needed, because of some change in the operation, equipment, etc.

### **Electronic Copy**

A disc provided with the application included an electronic copy of the submitted exhibits. It did not include a copy of the application text. Please include an electronic copy of the application text.

A completeness review will be conducted again when all information is received. When the application is determined complete, a technical review will be performed. The Division recognizes that the application review time will be extended as all information for the RML renewal has not been submitted.

If you have any questions or would like to arrange a meeting or conference call to discuss this matter, please call Heather Mickelson at (801) 536-4277 or Ryan Johnson at (801) 536-4255.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott T. Anderson', with a large, stylized flourish at the end.

Scott T. Anderson, Director  
Division of Waste Management and Radiation Control

STA/HLM/ka

c: David Blodgett, M.D., Health Officer, Southwest Utah Public Health Dept.  
Robert Beers, MBA, EHS, Environmental Health Director, Southwest Utah Public Health Dept.  
Paul Wright, P.E., DEQ District Engineer