

Monticello, Utah, National Priorities List (NPL) Sites Federal Facility Agreement (FFA) Quarterly Report: July 1-September 30, 2023

November 2023



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Abbreviations

3D three-dimensional AOA Area of Attainment

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act

DOE U.S. Department of Energy

EPA U.S. Environmental Protection Agency

FFA Federal Facility Agreement

gpad gallons per acre per day

gpm gallons per minute

GRO Groundwater Remedy Optimization

IC institutional control

LCRS Leachate Collection and Removal System

LDS Leak Detection System

LM Office of Legacy Management

LTS&M long-term surveillance and maintenance

LTS&M Plan Long-Term Surveillance and Maintenance Plan

MMTS Monticello Mill Tailings Site
MNA monitored natural attenuation
MVP Monticello Vicinity Properties

NPL National Priorities List

OU Operable Unit

PRB permeable reactive barrier

P&T pump-and-treat

TSF Temporary Storage Facility

UDEQ Utah Department of Environmental Quality

UDOT Utah Department of Transportation

ZVI zero-valent iron

1.0 Introduction

The U.S. Department of Energy (DOE) Office of Legacy Management (LM) submits this quarterly report to inform the U.S. Environmental Protection Agency (EPA) and the Utah Department of Environmental Quality (UDEQ) of the status of the Monticello Vicinity Properties (MVP) and the Monticello Mill Tailings Site (MMTS), collectively called the LM Monticello, Utah, Disposal and Processing Sites, for July 1 through September 30, 2023. The MVP and MMTS are National Priorities List (NPL) sites regulated under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as described in Title 42 *United States Code* Section 9601 et seq. (42 USC 9601 et seq.). Quarterly reports are submitted to EPA and UDEQ in February (for October through December), May (for January through March), August (for April through June), and November (for July through September).

LM assesses MVP and MMTS conditions and remedy protectiveness through (1) monthly, quarterly, and annual inspections of site infrastructure and operations as specified under the Long-Term Surveillance and Maintenance Plan for Monticello NPL Sites (LMS/MNT/S00387), also called the Long-Term Surveillance and Maintenance Plan (LTS&M Plan); (2) semiannual monitoring of groundwater and surface water under the Record of Decision for the Monticello Mill Tailings (USDOE) Site Operable Unit III, Surface Water and Ground Water, Monticello, Utah (DOE 2004); and (3) CERCLA Five-Year Reviews.

The primary long-term surveillance and maintenance (LTS&M) activities at the MVP and MMTS are conducted to (1) provide radiological control at properties where residual soil contamination from uranium mill tailings remains in place (supplemental standards properties), (2) operate and maintain the mill tailings repository, (3) ensure that institutional controls (ICs) restricting the use of land and water remain effective, (4) monitor water quality restoration progress, and (5) operate the Operable Unit (OU) III pump-and-treat (P&T) groundwater contingency remedy optimization system. This system, implemented in January 2015, focuses on groundwater remediation within a specified region of the alluvial aquifer called the Area of Attainment (AOA).

Annual groundwater reports present comprehensive data evaluation for the groundwater and surface water OU III remedy. LM has utilized the data presented in the most recent annual groundwater report to update the conceptual site model and develop a three-dimensional (3D) numerical fate and transport model to assess remedial time frames.

Project milestones and guiding documents are further described in the *Monticello Site Management Plan* (GJO-2003-493-TAC). Section 5.0 of that document is updated annually.

1.1 Quarterly Site Status

In summary, the activities and observations for this quarter consist of the following:

• The Groundwater Remedy Optimization (GRO) system operated from July 1 to August 7 this quarter. A leak on the transmission water line that transfers water to Pond 4 was discovered on August 7 near vault CS-MNT-10. The system has been inoperable and is scheduled for repair activities. The system pumped approximately 680,000 gallons of water from the AOA.

- The previous period's Federal Facility Agreement (FFA) quarterly report was sent to EPA and UDEQ in August 2023.
- Weekly site inspections were performed by site personnel to verify the integrity of the site's systems and monitor activities that might occur in supplemental standards properties (e.g., City of Monticello streets and utility corridors).
- Site personnel performed monthly and quarterly site inspections in accordance with the LTS&M Plan.
- Routine surveillance did not note any anomalous conditions for the MVP remedy.
- Routine surveillance did not note any violations of MMTS ICs that restrict land and groundwater use.
- Routine surveillance did not note any anomalous conditions for the surface features of the disposal cell and Pond 4, the engineered solar evaporation pond.
- Routine surveillance noted no operational deficiencies for the Temporary Storage Facility (TSF).

2.0 **MVP**

LTS&M for the MVP consists of providing radiological control at excavations in Monticello roadway and utility corridors, in Utah Department of Transportation (UDOT) rights-of-way within city limits, and at property MS-00176-VL (a privately owned supplemental standards property).

Surveillance results for this quarter are as follows:

- No anomalous conditions for the MVP remedy were noted.
- LM representatives continued to coordinate with city and UDOT officials via telecommunications regarding construction and excavation activities by the city, UDOT, and utility companies in roadway and utility corridors. LM follows the normal LTS&M protocol to provide radiological control in the affected roadways.
- Five excavations occurred in city streets this quarter. Site personnel radiologically surveyed the removed soils from the excavations, and no radiologically contaminated materials were found.
- A small amount of erosion was noticed on the U.S. Highway 191 embankment at Montezuma Creek (a supplemental standards property). The erosion is located near the top of the embankment near the highway right-of-way. The erosion area was scanned by the site Safety and Health technician for radiological contamination. No radiologically contaminated material was found. UDOT is aware of the erosion issue and has stabilized the erosion on the embankment until permanent repairs can be performed. No unauthorized excavations were observed.
- A surveillance of property MS-00176-VL identified no excessive erosion of supplemental standards material or violation of the land-use restriction on building construction.

3.0 MMTS

LTS&M activities for the MMTS consist of (1) maintaining the onsite repository and operating the associated Leachate Collection and Removal System (LCRS) and Leak Detection System (LDS) for the disposal cell and Pond 4, (2) surveillance of properties affected by groundwater-use and land-use ICs on the former Monticello mill (mill site) and peripheral properties, and (3) operation and maintenance of the OU III GRO system.

3.1 **OUI**

OU I consists of the properties that contain the mill site and repository. Radioactively contaminated materials were removed from the MVP, the mill site, and peripheral properties (OU II) and encapsulated at the repository as a remedial action completed in 1999. LM owns and manages the repository, and the city owns the former mill site and manages it as a public park.

3.1.1 Repository and Pond 4

Monthly, quarterly, and annual inspections of the repository ensure that remedy controls remain intact, and the waste remains isolated from the environment.

Inspection observations and maintenance activities for the quarter consist of the following:

- No area of the repository cover showed settling, slumping, fracturing, seepage, ponding, or significant erosion.
- No anomalous surface feature conditions were observed at the disposal cell or Pond 4. Surveillance checklists for this quarter are attached as Appendix A. No further minor burrowing by voles and small ground squirrels was observed this quarter on the disposal cell and Pond 4 berm.
- The disposal cell LCRS and LDS were operated in accordance with the requirements specified in the LTS&M Plan. Findings for the disposal cell LCRS and LDS this quarter include the following:
 - Leachate production from the disposal cell was approximately 570 gallons per week combined for sumps LCRS 1 and LCRS 2. There is no action level for the disposal cell LCRS. See Appendix B for a graphical depiction of leachate production history.
- The disposal cell LDS continues to receive no water; therefore, the disposal cell LDS action level was not exceeded.
- Operation of the OU III GRO system resulted in increased water collection in the Pond 4 LCRS. Pond 4 LCRS and LDS action levels, approved by EPA and UDEQ, were formally developed in the *Repository and Pond 4 Groundwater Contingency Plan-Final* (DOE 1998) and are also found in Appendix D, Section 5.0 of the LTS&M Plan. The leakage rate action level established for the Pond 4 LCRS is 851 gallons per acre per day (gpad) (2000 gallons per day), and the leakage rate action level for the LDS is 20 gpad (47 gallons per day), which is averaged over a 7-day period. These leakage rates are based on the area of the floor of Pond 4, which is 2.35 acres. Currently, the LCRS and LDS monitoring and pumping systems are functioning as designed to recirculate water back into Pond 4.

- Findings for the Pond 4 LCRS and LDS for this period are as follows:
 - Water collection at the Pond 4 LCRS continued but did not exceed the action level this quarter (see Appendix B)
 - Water collection in the Pond 4 LDS remained below the action level (Appendix B)

3.1.2 TSF

Routine surveillance of the TSF ensures that the maintenance and radiological controls that govern the access to and placement, storage, and transfer of contaminated material in the TSF are current and effective. Surveillance this quarter (see the surveillance checklists in Appendix A) revealed that:

• The TSF cover, fencing, radiological controls, and signs have been maintained in accordance with the LTS&M Plan, and the TSF has been inspected and verified as being ready to receive contaminated materials.

LM is required to initiate the transfer of TSF materials for permanent disposal at the Grand Junction, Colorado, Disposal Site when the contents reach a volume of approximately 75 cubic yards. Recent TSF activity consists of the following:

- No excavated soil from city streets was added to the TSF during July 1–September 30.
- Approximately 6 cubic yards of soil excavated from the city streets is currently stored in the TSF. All 6 cubic yards of soil originated from an excavation that occurred on July 26, 2022.

3.1.3 Mill Site

LM conducts surveillance of the mill site (properties MP-00181-VL and MS-00893-OT) to ensure compliance with ICs implemented to preserve the OU I remedy for soil and groundwater. ICs applicable to the mill site include prohibitions on installing domestic-use wells in the alluvial aquifer, using the property for residential purposes, constructing habitable structures, and overnight camping, as well as preserving the property for day use as a public park.

Surveillance results for this quarter revealed:

• No nonconformance with water-use and land-use restrictions.

3.2 **OU II**

OU II consists of private and city-owned properties peripheral to the mill site. LM conducts surveillance of OU II properties to verify compliance with ICs implemented to preserve the OU II remedy for soil and groundwater.

Surveillance results for this quarter are summarized below for the different components of OU II.

• Montezuma Creek Restrictive Easement Area (supplemental standards properties, both city-owned and privately owned): No evidence of nonconformance with land-use restrictions (e.g., prohibitions on soil removal and construction of habitable structures in supplemental standards properties) was observed.

- **Groundwater-Use Restrictions:** These were applied to several OU II properties under the 2000 quitclaim deed by which DOE transferred selected properties to the city. No evidence of nonconformance with these restrictions (e.g., prohibition on installing domestic-use wells in the alluvial aquifer) was observed.
- **Property MP-00211-VL (city-owned):** No evidence of nonconformance with the land-use restriction on building construction was observed.
- **Pinyon-Juniper Supplemental Standards Properties (city-owned):** No evidence of nonconformance with land-use and groundwater-use restrictions was observed.
- Excessive Erosion: No storm events resulted in more than 2.8 inches of precipitation in 24 hours, which would require surveillance of supplemental standards cleanup properties for excessive erosion.

3.3 **OU III**

OU III consists of groundwater and surface water contamination resulting from operation of the mill site. Routine monitoring of OU III (water quality and water level) is normally performed semiannually in April and October. The next semiannual sampling event is scheduled for October 2023.

The contaminated groundwater is within the alluvial aquifer beneath the valley of Montezuma Creek, some sections of which are contaminated by the influent of contaminated groundwater. A portion of the aquifer is subject to ICs restricting use. Montezuma Creek is used for limited irrigation and livestock watering. There are no ICs restricting surface water use.

The current groundwater remedy includes (1) monitored natural attenuation (MNA) with ICs and (2) P&T remediation by evaporation that was implemented as the GRO system in January 2015. Operation and performance of the groundwater remedy are reported annually. Previous remediation efforts have included (1) in situ treatment by zero-valent iron (ZVI) within a permeable reactive barrier (PRB) and (2) P&T remediation that used ex situ ZVI treatment. The ex situ ZVI treatment system was deactivated in December 2014 and replaced by the GRO system, which is described in greater detail in Section 3.3.2. The PRB remains a component of the GRO system as a groundwater flow barrier.

3.3.1 Groundwater Restricted Area

During spring and fall, LM conducts surveillance of properties where groundwater contamination is present to ensure compliance with the groundwater-use restriction (i.e., no installation of domestic-use wells in the alluvial aquifer). The affected OU III properties constitute the Monticello Groundwater Restricted Area as defined and administered by the State of Utah Division of Water Rights. Surveillance found:

• No evidence of nonconformance with the groundwater-use restriction since its implementation in May 1999.

3.3.2 OU III GRO System

The GRO system includes eight vertical extraction wells strategically placed in the AOA to extract contaminated groundwater and an associated monitoring system. The water from the extraction wells is transmitted in buried pipelines to an aboveground holding tank in the groundwater transfer building; from there, it is pumped through a buried water transmission line for about 1 mile to Pond 4 for evaporation.

The associated monitoring system consists of 22 wells installed in the AOA. Sixteen of the 22 wells were installed south of Montezuma Creek in 2014, and 6 wells were installed north of Montezuma Creek in 2017. These 22 monitoring wells are sampled recurrently following the extraction of approximately 1,000,000 gallons of water from the GRO system as stated in Section 1.5 of the *Remedial Action Completion Report for Operable Unit III Groundwater Contingency Remedy Optimization System, Monticello Mill Tailings Site, Monticello, Utah* (DOE 2016).

• No 1,000,000-gallon sampling events were performed during this quarter.

3.3.2.1 GRO System Quarterly Performance Summary

The GRO system performance for the quarter is summarized below.

- Groundwater extraction during the quarter was approximately 680,000 gallons, equivalent to an average flow rate of 5.13 gallons per minute (gpm). Assuming the uranium concentration in groundwater extracted throughout the quarter was equal to the uranium concentration of the tank effluent on June 14, 2023 (the date of the most recent sample collected), approximately 2.0 pounds of uranium was removed during this quarter.
- The GRO system operated from July 1 to August 7 this quarter. A leak on the transmission water line that transfers water to Pond 4 was discovered on August 7 near vault CS-MNT-10. The GRO system has been inoperable and is scheduled for repair activities. The system pumped approximately 680,000 gallons of water from the AOA from July 1 to August 7.
- During the quarter, the volume of water stored in Pond 4 decreased by approximately 1,030,000 gallons. The GRO system operates by balancing the extraction rate and the Pond 4 evaporation rate while maintaining the Pond 4 storage volume between 5,000,000 and 8,000,000 gallons (the maximum storage volume of Pond 4 is approximately 15,600,000 gallons).
- Water-level monitoring during the quarter consisted of:
 - Continuous water-level monitoring in AOA extraction and monitoring wells using
 pressure transducers and dataloggers (programmed to record at 5-minute intervals)
 connected to the LM System Operation and Analysis at Remote Sites (SOARS) system.
- Cumulatively, the system has removed 31,000,000 gallons of contaminated groundwater from the aquifer since system startup in January 2015 (Table 1).
- Assuming a minimum AOA uranium plume pore volume of 2,400,000 gallons and a maximum pore volume of 3,300,000 gallons, the GRO system has removed between 9.4 and 12.9 pore volumes since system startup.

• From January 2015 through June 14, 2023, the GRO system removed approximately 150 pounds of uranium from the AOA aquifer (Table 2). Estimates of the cumulative uranium mass removed are updated only at sampling events.

Table 1. GRO System Treatment: Monthly Volumes and Rates for This Quarter and Cumulative Volumes Since January 2015

Calendar Month	Approximate Volume Pumped (millions of gallons)	Effective Pumping Rate (gpm)	Approximate Cumulative Volume ^a (millions of gallons)
July 2023	0.54	12.02	30.9
August 2023	0.14	3.20	31.0
September 2023	0.00	0.00	31.0

Note:

Table 2. Uranium Mass Removal from Groundwater in the AOA

Tank Effluent Sample Date ^a	Effluent Tank Uranium Concentration (µg/L)	Volume Removed Between Tank Samples (millions of gallons)	Uranium Removed (pounds) ^b	Cumulative Mass of Uranium Removed ^c (pounds)
April 19, 2023	601	1.01	4.6	146
June 14, 2023	355	1.04	4.2	150

Notes:

Abbreviation:

μg/L = micrograms per liter

Monitoring and reporting guidelines for the GRO system are described in the *Final Groundwater Contingency Remedy Optimization Remedial Design/Remedial Action Work Plan for the Monticello Mill Tailings Site Operable Unit III, Monticello, Utah* (DOE 2014). Evaluation of water quality trends and whether remediation goals are being met, in the AOA and sitewide, is beyond the scope of this FFA quarterly report but is provided in annual groundwater reports submitted to EPA and UDEQ.

3.3.3 OU III Closure Strategy

Regarding the OU III closure strategy, LM continued to develop the draft Feasibility Study for OU III during this quarter. Work focused on additional follow-up actions from the Sixth Five-Year Review that will support the Feasibility Study, including an ecological risk evaluation of Montezuma Creek and an assessment of IC options for restricting the use of Montezuma Creek as a drinking water source. Preferred IC options were evaluated against the nine criteria of the National Contingency Plan (NCP) and will be incorporated into the

^a Cumulative volume is based on the volume of groundwater extracted by the GRO system since system startup in January 2015.

^a Sampling occurs following the extraction of approximately 1,000,000 gallons.

^b Uranium removed since last sampling event. Estimate is based on the median concentration between sampling dates.

^c Since GRO system startup in January 2015. Estimates of cumulative mass removed are updated every sampling event.

MMTS OU III Feasibility Study. Note that one action among these follow-up actions resulted in a reissue of the Monticello site LTS&M Plan. It is anticipated that will take place following the finalization of the Feasibility Study.

4.0 Schedule of Activities and Deliverables

Table 3 summarizes the completion dates of recently completed and near-term planned activities and deliverables for the Monticello NPL sites.

Table 3. Monticello Sites Recent and Near-Term Activities and Deliverables

Activity or Deliverable	Schedule		
Revising the <i>Quality Assurance Project Plan, Monticello, Utah, Disposal</i> and <i>Processing Sites</i> (LM-Plan-3-21-1.0, LMS/MNT/S27252)	The Quality Assurance Project Plan was submitted to regulators on September 7, 2023.		
Monticello, Utah, National Priorities List (NPL) Sites Federal Facility Agreement (FFA) Quarterly Report: April 1–June 30, 2023 (DOE 2023)	Submitted to EPA and UDEQ on September 25, 2023.		
 CERCLA Sixth Five-Year Reviews for the MVP and MMTS: Sixth Five-Year Review Report for Monticello Mill Tailings (USDOE) Site, San Juan County, Monticello, Utah (DOE 2022a) Sixth Five-Year Review Report for Monticello Radioactively Contaminated Properties Superfund Site, San Juan County, Monticello, Utah (DOE 2022b) 	Submitted to EPA and UDEQ on May 2, 2022.		
 Five-Year Review addendum activities include the following: Errata sheets were resolved and submitted on April 6, 2023 The LTS&M Plan clarification letter regarding Table 7 was sent on March 2, 2023 DOE to create and send an informational letter to landowners with deed restrictions that clearly explains the restrictions on their property DOE to update the Uniform Federal Policy for Quality Assurance Project Plans, Sampling and Analysis Plan, Program Directive 2021-10-MNT, and the LTS&M Plan to be consistent regarding the monitoring well network DOE to complete a Feasibility Study to evaluate remedial alternatives for achieving the water quality restoration Remedial Action Objectives DOE to evaluate risk to aquatic organisms using current Utah water quality standards DOE designating Montezuma Creek as an area of concern IC option to prevent human consumption of surface water as a domestic drinking water source EPA suggested using a layered IC approach; the DOE-preferred second IC option will be presented in the MMTS OU III Feasibility Study DOE evaluation of IC options against the nine criteria of the NCP will be incorporated into the MMTS OU III Feasibility Study 	Proposed dates for addendum documents: Informational letters submitted on December 22, 2022 Draft Feasibility Study due June 28, 2024 Final risk evaluation due December 29, 2023 IC evaluation due December 29, 2023		

5.0 References

- 42 USC 9601 et seq. "Comprehensive Environmental Response, Compensation, and Liability Act" as amended, *United States Code*.
- DOE (U.S. Department of Energy), 1998. *Repository and Pond 4 Groundwater Contingency Plan-Final*, MAC-MRAP 3.5.8, February.
- DOE (U.S. Department of Energy), 2004. Record of Decision for the Monticello Mill Tailings (USDOE) Site Operable Unit III, Surface Water and Ground Water, Monticello, Utah, DOE-LM/GJ629-2004, Office of Legacy Management, May.
- DOE (U.S. Department of Energy), 2014. Final Groundwater Contingency Remedy Optimization Remedial Design/Remedial Action Work Plan for the Monticello Mill Tailings Site Operable Unit III, Monticello, Utah, LMS/MNT/S10629, Office of Legacy Management, May.
- DOE (U.S. Department of Energy), 2016. Remedial Action Completion Report for Operable Unit III Groundwater Contingency Remedy Optimization System, Monticello Mill Tailings Site, Monticello, Utah, LMS/MNT/S13373, Office of Legacy Management, May.
- DOE (U.S. Department of Energy), 2018. OU III Closure Strategy for the Monticello Mill Tailings Site, Monticello, Utah, LMS/MNT/S18146, Office of Legacy Management, May.
- DOE (U.S. Department of Energy), 2022a. Sixth Five-Year Review Report for Monticello Mill Tailings (USDOE) Site, San Juan County, Monticello, Utah, LMS/MNT/S35986, Office of Legacy Management, July.
- DOE (U.S. Department of Energy), 2022b. Sixth Five-Year Review Report for Monticello Radioactively Contaminated Properties Superfund Site, San Juan County, Monticello, Utah, LMS/MNT/S36208, Office of Legacy Management, June.
- DOE (U.S. Department of Energy), 2023. *Monticello, Utah, National Priorities List (NPL) Sites Federal Facility Agreement (FFA) Quarterly Report: April 1–June 30, 2023*, LMS/MNT/45167, Office of Legacy Management, August.

Long-Term Surveillance and Maintenance Plan for Monticello NPL Sites, LMS/MNT/S00387, continually updated, prepared by the LMS contractor for the U.S. Department of Energy Office of Legacy Management.

Monticello Site Management Plan, GJO-2003-493-TAC, continually updated, prepared by the LMS contractor for the U.S. Department of Energy Office of Legacy Management.

Quality Assurance Project Plan, Monticello, Utah, Disposal and Processing Sites, LM-Plan-3-21-1.0, LMS/MNT/S27252, continually updated, prepared by the LMS contractor for the U.S. Department of Energy Office of Legacy Management.

Appendix A

Monthly and Quarterly Surveillance Checklists



Monthly Pond 4 Surveillance Checklist

Level of water in Pond 4	7.10		
luono eti en Itana	Acce	. m t a la la	Comments and Decommendation
Inspection Item		eptable	Comments and Recommendation
	Yes	No	
Condition of:	5 -7		
Fences, gates, and locks			
Roads			
Signs	\boxtimes		
Visible piping	\boxtimes		
Visible liner and anchors	\boxtimes		
Rescue equipment			Boat remains at pond.
Evidence of erosion of:			
Top of Pond 4 berm	\boxtimes		
Pond 4 sideslopes	\boxtimes		
Ditches	\boxtimes		
Surrounding area	\boxtimes		
Seepage from Pond 4	\boxtimes		
Overtopping of Pond 4	\boxtimes		
Evidence of:			
Vandalism	\boxtimes		
Intrusion by wildlife	\boxtimes		
Intrusion by humans	\boxtimes		
Accumulation of trash	\boxtimes		
Additional comments: The	nings appear to be	in good co	ndition.
Monticello LM Representa	tive:		Date: 7/31/2023

Monticello City and Repository Site Routine Inspection, Surveillance, and Monitoring Procedures, Monticello, Utah (LMS/MNT/S10320) LMS 5501 MNT

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Repository Area Surveillance Checklist

	Qua	rterly s	urveillance: ☐ February ☐ May ☐ August ☐ November
Storm event triggered so	urveilland	e due	to inches of rainfall over the past 24 hours.
Inspection Item	Acce _l Yes	ptable No	Comments and Recommendation
Condition of:			
Fences, gates, and locks			Two fence gates were repaired at the Notheast corner of the perimeter fence.
Roads ^a	\boxtimes		
Signs	\boxtimes		
Site monuments	\boxtimes		
Drainage ditches ^a	\boxtimes		
Manholes	\boxtimes		
Vegetation	\boxtimes		Looks very healthy.
Evidence of erosion of:			
Top of disposal cell ^a	\boxtimes		
Disposal cell sideslopes ^a	\boxtimes		
Ditches	\boxtimes		
Surrounding area	\boxtimes		
Evidence of:			
Vandalism	\boxtimes		
Intrusion by livestock	\boxtimes		
Burrowing animal damage	\boxtimes		
Intrusion by humans	\boxtimes		
Accumulation of trash	\boxtimes		
Additional Quarterly Surv	eillance	Requi	irements
	=igure 3-1	, must i	be walked during this inspection.
Condition of:			
Settlement plate structures			
Manholes ^b			
Sediment ponds			
Evidence of:			
Structural instability			
Additional comments: T	hings ap	pear to	be in good condition.
·			
Signature:		Montic	Date: 7/31/2023

^aInspections required following a significant storm event

^bOpen to inspect quarterly

MONTHLY CLIMATOLOGICAL SUMMARY for JUL. 2023

NAME: Monticello CITY: STATE:

ELEV: 7070 ft LAT: 37° 48' 00" N LONG: 109° 18' 00" W

TEMPERATURE (°F), RAIN (in), WIND SPEED (mph)

DAY	MEAN TEMP	HIGH	TIME	LOW	TIME	HEAT DEG DAYS	COOL DEG DAYS	RAIN	AVG WIND SPEED	HIGH	TIME	DOM DIR
1	69.1	82.7	5:00p	55.6	2:30a	2.3		0.00	6.5	23.0	5:00p	NNW
2	73.0	84.7	4:00p	60.1	5:30a	0.8	8.8	0.00	7.4	25.0	2:00p	WSW
3	74.5	86.0	5:30p	63.0	6:00a	0.1		0.00	5.7	29.0	3:00p	WSW
4	75.9	88.9	5:00p	61.7	4:00a	0.1	11.0	0.00	7.4	30.0	5:30p	SW
5	73.8	85.0	4:30p	56.8	6:30a	0.7	9.5	0.00	6.6	23.0	4:30p	SW
6	72.1	85.6	4:30p	52.7	7:00a	1.3	8.4	0.00	7.6	28.0	4:30p	S
7	73.1	84.8	5:00p	58.4	5:30a	0.5	8.6	0.00	7.1	35.0	5:00p	SSW
8	72.6	85.1	5:00p	57.1	6:00a	0.7	8.4	0.00	7.7	25.0	3:00p	S
9	74.9	87.9	4:00p	55.4	4:00a	1.1	10.9	0.00	6.3	28.0	10:30p	WSW
10	75.7	85.5	2:30p	61.6	5:30a	0.1	10.8	0.00	7.7	27.0	5:30p	SW
11	75.4	86.5	5:00p	62.1	5:00a	0.2	10.5	0.00	5.8	22.0	7:30p	WSW
12	75.5	87.8	4:00p	59.3	6:00a	0.5	10.9	0.00	6.3	28.0	2:00p	SSW
13	78.6	89.4	3:00p	67.8	7:00a	0.0	13.6	0.00	6.1	21.0	3:30p	WSW
1.4	78.1	89.0	4:30p	64.4	6:30a	0.0	13.1	0.00	8.1	27.0	4:00p	MNM
15	75.8	87.9	5:00p	65.5	12:00m	0.0	10.8	0.00	10.2	23.0	2:30a	WNW
16	78.2	91.3	4:00p	62.4	6:30a	0.1	13.3	0.00	6.7	23.0	4:30p	W
17	81.9	95.4	4:30p	68.4	6:30a	0.0	16.9	0.00	7.5	25.0	1:30p	WSW
18	79.8	89.8	5:00p	68.8	10:00p	0.0	14.8	0.00	8.0	32.0	8:30p	WNW
19	73.7	85.0	12:00p	63.2	3:30a	0.1	8.7	0.12	4.4	21.0	2:00p	NNW
20	76.1	88.6	4:00p	61.2	6:30a	0.3	11.4	0.00	6.6	21.0	4:00p	WNW
21	76.2	88.8	4:30p	62.5	6:30a	0.1	11.3	0.00	7.4	20.0	12:00p	NNW
22	77.2	90.8	5:30p	63.8	6:00a	0.0	12.2	0.00	5.0	18.0	3:00p	NNW
23	77.5	92.1	5:30p	62.4	6:30a	0.1	12.7	0.00	7.0	23.0	11:00a	SSE
24	77.4	90.9	4:30p	61.6	4:30a	0.2	12.6	0.00	7.0	24.0	4:30p	SSE
25	75.2	87.3	4:30p	63.4	6:30a	0.0	10.2	0.08	4.7	25.0	g00:8	WNW
26	78.4	91.3	3:30p	61.5	6:00a	0.1	13.4	0.00	5.9	27.0	4:00p	WNW
27	77.4	89.2	3:00p	65.9	3:30a	0.0	12.4	0.02	6.3	37.0	5:30a	SSW
28	77.7	90.8	4:30p	61.7	5:30a	0.2	12.9	0.00	7.0	23.0	2:30p	WSW
29	77.6	91.5	5:30p	65.4	3:30a	0.0	12.6	0.00	5.3	27.0	6:00a	S
30	73.9	87.3	3:00p	60.6	6:30a	0.2	9.1	0.00	7.6	33.0	11:00p	S
31	71.8	84.3	4:00p	57.8	6:30a	0.9	7.7	0.00	7.3	33.0	9:00p	SSE
	75.7	95.4	17	52.7	6	10.7	343.7	0.22	6.8	37.0	27	WSW

Max >= 90.0: 8

 $Max \le 32.0: 0$

 $Min \le 32.0: 0$

Min $\leq 0.0: 0$

Max Rain: 0.12 ON 07/19/23

Days of Rain: 3 (>.01 in) 1 (>.1 in) 0 (>1 in)

Heat Base: 65.0 Cool Base: 65.0 Method: Integration



Monthly Pond 4 Surveillance Checklist

Level of water in Pond 4	6.74		
luonootion ltono	A	حاجات	Comments and Decommendation
Inspection Item		otable	Comments and Recommendation
	Yes	No	
Condition of:	-		
Fences, gates, and locks			
Roads	\boxtimes		S
Signs	\boxtimes		=
Visible piping	\boxtimes		
Visible liner and anchors	\boxtimes		<u>. </u>
Rescue equipment	\boxtimes		Boat remains at pond.
Evidence of erosion of:			
Top of Pond 4 berm	\boxtimes		
Pond 4 sideslopes	\boxtimes		
Ditches	\boxtimes		
Surrounding area	\boxtimes		
Seepage from Pond 4	\boxtimes		
Overtopping of Pond 4	\boxtimes		
Evidence of:			
Vandalism	\boxtimes		
Intrusion by wildlife	\boxtimes		
Intrusion by humans	\boxtimes		<u> </u>
Accumulation of trash	\boxtimes		
Additional comments: Thi tranmission line failure.	ngs appear to be	in good co	ondition. No water from ther GWTB is being pumped due to
),		
	√		
Monticello LM Representati	ve:		Date: 8/31/2023

Monticello City and Repository Site Routine Inspection, Surveillance, and Monitoring Procedures, Monticello, Utah (LMS/MNT/S10320) LMS 5501 MNT

April 19, 2021

Page 1 of 2



Repository Area Surveillance Checklist

	Quar	terly s	urveillance: ☐ February ☐ May ☒ August ☐ November					
Storm event triggered surveillance due to inches of rainfall over the past 24 hours.								
Inspection Item	Acce _l Yes	otable No	Comments and Recommendation					
Condition of:								
Fences, gates, and locks			Two strans of fence and and a few stays were repaired on the north perimeter fence line. Several stays were straightened tightened on the south fence line.					
Roads ^a	\boxtimes							
Signs	\boxtimes							
Site monuments	\boxtimes							
Drainage ditches ^a	\boxtimes							
Manholes	\boxtimes		One sign was replaced and two were re-attached.					
Vegetation	\boxtimes		Looks still very healthy.					
Evidence of erosion of:								
Top of disposal cell ^a	\boxtimes							
Disposal cell sideslopes ^a	\boxtimes							
Ditches	\boxtimes							
Surrounding area	\boxtimes							
Evidence of:								
Vandalism	\boxtimes							
Intrusion by livestock	\boxtimes							
Burrowing animal damage	\boxtimes							
Intrusion by humans	\boxtimes							
Accumulation of trash	\boxtimes							
Additional Quarterly Surv	eillance	Requi	rements					
	igure 3-1	must b	ne walked during this inspection.					
Condition of:		25.00						
Settlement plate structures								
Manholes ^b	\boxtimes							
Sediment ponds	\boxtimes							
Evidence of:								
Structural instability	\boxtimes							
Additional comments: The	ոings apբ	ear to	be in good condition.					
Signature:		Ŋ	Date: 8/31/2023					
	V2 105-	Montic	ello LM Representative					

^aInspections required following a significant storm event

LMS 5502 MNT

Page 1 of 2

April 19, 2021

MONTHLY CLIMATOLOGICAL SUMMARY for AUG. 2023

NAME: 1 CITY: STATE: ELEV: 0 ft LAT: LONG:

TEMPERATURE (°F), RAIN (in), WIND SPEED (mph)

DAY	MEAN TEMP	HIGH	TIME	LOW	TIME	HEAT DEG DAYS	COOL DEG DAYS	RAIN	AVG WIND SPEED	HIGH	TIME	DOM DIR	
1	68.9	81.0	3:30p	56.3	5:00a	1.6	5.6	0.00	5.5	21.0	11:30a	SSE	
2	69.1	83.3	4:30p	55.7	11:30p	1.5	5.7	0.01	7.0	40.0	6:00p	S	
3	66.9	81.3	4:30p	53.5	2:30a	3.1	5.0	0.00	7.4	32.0	12:30p	SSE	
4	70.6	83.5	3:00p	56.7	6:30a	1.6	7.2	0.00	4.1	20.0	2:30p	M	
5	74.7	87.2	4:30p	62.5	4:00a	0.1	9.8	0.00	6.0	23.0	5:00p	SW	
6	75.6	87.2	4:30p	62.0	1:30a	0.1	10.7	0.00	7.7	27.0	3:30p	SSW	
7	74.8	86.7	4:30p	58.5	7:00a	0.4	10.2	0.00	7.1	25.0	12:30p	SW	
8	73.4	83.6	4:30p	60.9	7:00a	0.2	8.6	0.00	8.6	29.0	3:30p	SW	
9	72.2	84.8	4:30p	56.1	7:00a	0.8	8.0	0.00	5.2	18.0	1:00p	MNM	
10	67.9	80.0	3:00p	55.9	7:00a	1.9	4.8	0.00	7.5	24.0	3:30p	SSW	
11	66.2	80.8	4:00p	50.8	6:30a	3.7	4.9	0.03	4.6	26.0	7:30p	SE	
12	66.1	77.5	6:30p	54.1	5:30a	2.7	3.8	0.01	4.6	26.0	12:30p	WSW	
13	69.3	83.2	5:00p	54.2	5:30a	2.7	7.0	0.00	3.5	16.0	5:30p	WSW	
14	67.7	76.4	1:30p	59.8	12:00m	0.9	3.6	0.04	6.2	21.0	4:00p	S	
15	69.6	83.7	4:30p	57.1	2:00a	1.2	5.8	0.00	5.6	18.0	2:00p	SE	
16	71.7	83.2	5:30p	60.3	7:00a	0.4	7.1	0.03	4.5	17.0	12:00p	WSW	
17	74.1	87.6	4:30p	59,8	7:00a	0.5	9.6	0.00	5.0	23.0	3:30p	S	
1.8	70.0	82.9	4:00p	61.3	12:00m	0.8	5.8	0.02	6.0	23.0	5:30p	S	
19	70.2	84.6	4:00p	56.3	7:00a	1.9	7.0	0.00	5.6	21.0	2:00p	SSE	
20	74.0	85.8	4:00p	60.3	7:00a	0.9	9.9	0.00	10.6	35.0	5:30p	SE	
21	73.1	83.8	5:30p	62.1	7:00a	0.2	8.3	0.01	11.3	35.0	7:30p	SSE	
22	69.3	80.3	4:30p	61.0	7:00a	0.6	4.9	0.00	7.5	31.0	5:30p	SE	
23	66.8	82.9	4:00p	55.7	4:30a	2.8	4.7	0.22	4.8	20.0	7:00p	WSW	
24	59.8	67.4	1:00p	56.1	12:00m	5.3	0.1	0.79	4.0	16.0	2:00p	NNW	
25	64.2	74.8	5:30p	55.6	2:00a	3.2	2.4	0.01	3.5	13.0	4:30p	MNM	
26	68.1	80.3	4:30p	57.5	7:30a	1.4	4.5	0.00	4.7	19.0	9:00p	WSW	
27	67.9	80.2	5:30p	57.7	6:30a	1.5	4.4	0.22	5.9	19.0	12:30p	WSW	
28	71.2	82.2	2:30p	59.3	7:00a	0.7	6.9	0.00	6.2	22.0	2:30p	M	
29	71.3	84.3	5:30p	59.1	7:00a	0.9	7.2	0.00	4.2	15.0	1:30p	SE	
30	72.9	84.7	4:30p	63.3	3:30a	0.1	8.0	0.00	8.1	30.0	3:00p	S	
31	75.7 	85.5 	3:00p	64.6	7:00a	0.0	10.7	0.00	7.6	25.0 	11:00p	SW 	
	70.1	87.6	17	50.8	11	43.7	202.2	1.39	6.1	40.0	2	S	

Max >= 90.0: 0 $Max \le 32.0: 0$ $Min \le 32.0: 0$ Min <= 0.0: 0

Max Rain: 0.79 ON 08/24/23

Days of Rain: 7 (>.01 in) 3 (>.1 in) 0 (>1 in) Heat Base: 65.0 Cool Base: 65.0 Method: Integration



Monticello Long-Term Surveillance and Maintenance Temporary Storage

		(TSF) Record Book Inspection Report
Are t	these	areas acceptable?
Yes	No	
\boxtimes		Was the gate locked upon arrival?
\boxtimes		Are signs posted in accordance with 10 CFR 835.602[a]?
\boxtimes		Are all postings legible?
\boxtimes		Are enclosures on the concrete bin and stored drum containers tight?
\boxtimes		Are containers in good physical condition (no rust, no holes, no bulges, etc.)?
\boxtimes		How much radiologically-contaminated material is in the concrete bin? Note: the material should be shipped when the volume in storage approaches 75 percent of the storage capacity.
\boxtimes		Is the surface area of the TSF in good physical condition (no erosion, no flood damage, no excessive vegetation growth, etc.)?
\boxtimes		Has radiological monitoring been conducted in accordance with 10 CFR 835.405[d]?
\boxtimes		Is the security fence in good condition?
Com	ment	
THE	CONC	rete bin contains 6 cubic yards of radiologically contaminated material.

Signature of Monticello LM Representative

8/31/2023 Date of Inspection



Monthly Pond 4 Surveillance Checklist

Level of water in Pond 4 6.37			
Inspection Item	Accer	otable	Comments and Recommendation
	Yes	No	
Condition of:			
Fences, gates, and locks	\boxtimes		
Roads	\boxtimes		
Signs			New signs installed on both Emergency Equipment cabinets
Visible piping			
Visible liner and anchors			
Rescue equipment	\boxtimes		Boat remains at pond.
Evidence of erosion of:			
Top of Pond 4 berm	\boxtimes		
Pond 4 sideslopes	\boxtimes		
Ditches	\boxtimes		
Surrounding area	\boxtimes		
Seepage from Pond 4	\boxtimes		
Overtopping of Pond 4	\boxtimes		
Evidence of:			
Vandalism	\boxtimes		
Intrusion by wildlife	\boxtimes		
Intrusion by humans	\boxtimes		
Accumulation of trash	\bowtie		

Additional comments: Things appear to be in good condition.

Monthly Pond 4 Surveillance Checklist

	Q		
Monticello LM Representative:		Date:	09/27/2023



Repository Area Surveillance Checklist

Storm event triggered surveillance due to		Quarterly	surveillance:				
Yes No	☐ Storm event triggered sur	rveillance du	e to inches of rainfall over the past 24 hours.				
Roads a	Inspection Item		e Comments and Recommendation				
Roads	Condition of:						
Signs Site monuments Drainage ditches ^a Manholes Wegetation Evidence of erosion of: Top of disposal cell ^a Disposal cell sideslopes ^a Ditches Surrounding area Evidence of: Vandalism Intrusion by livestock Burrowing animal damage Intrusion by humans Accumulation of trash Note: All transects, shown in Figure 3-1, must be walked during this inspection. Condition of: Settlement plate structures Manholes ^a Sediment ponds Evidence of: Signature: Date: 09/27/2023	Fences, gates, and locks						
Sile monuments	Roads ^a		Roads were graded early in September, excellent shape.				
Drainage ditchesa	Signs						
Manholes	Site monuments						
Vegetation	Drainage ditches ^a						
Evidence of erosion of: Top of disposal cella	Manholes		One new sign was installed at manhole #4 and #5				
Top of disposal cell®	Vegetation		Looks very healthy.				
Disposal cell sideslopes ^a	Evidence of erosion of:						
Ditches Surrounding area Evidence of: Vandalism Intrusion by livestock Burrowing animal damage Intrusion by humans Accumulation of trash Additional Quarterly Surveillance Requirements Note: All transects, shown in Figure 3-1, must be walked during this inspection. Condition of: Settlement plate structures Manholes ^b Sediment ponds Evidence of: Structural instability Additional comments: Things appear to be in good condition. Date: 09/27/2023	Top of disposal cell ^a						
Surrounding area	Disposal cell sideslopes ^a						
Evidence of: Vandalism Intrusion by livestock Burrowing animal damage Intrusion by humans Accumulation of trash Additional Quarterly Surveillance Requirements Note: All transects, shown in Figure 3-1, must be walked during this inspection. Condition of: Settlement plate structures Manholesb Sediment ponds Evidence of: Structural instability Additional comments: Things appear to be in good condition. Date: 09/27/2023	Ditches						
Vandalism Intrusion by livestock Burrowing animal damage Intrusion by humans Accumulation of trash Additional Quarterly Surveillance Requirements Note: All transects, shown in Figure 3-1, must be walked during this inspection. Condition of: Settlement plate structures Manholesb Sediment ponds Evidence of: Structural instability Additional comments: Things appear to be in good condition. Date: 09/27/2023	Surrounding area						
Intrusion by livestock	Evidence of:						
Burrowing animal damage	Vandalism						
Intrusion by humans	Intrusion by livestock						
Accumulation of trash Additional Quarterly Surveillance Requirements Note: All transects, shown in Figure 3-1, must be walked during this inspection. Condition of: Settlement plate structures Manholesb Sediment ponds Evidence of: Structural instability Additional comments: Things appear to be in good condition. Date: 09/27/2023	Burrowing animal damage						
Additional Quarterly Surveillance Requirements Note: All transects, shown in Figure 3-1, must be walked during this inspection. Condition of: Settlement plate structures	Intrusion by humans						
Note: All transects, shown in Figure 3-1, must be walked during this inspection. Condition of: Settlement plate structures	Accumulation of trash						
Condition of: Settlement plate structures	Additional Quarterly Surve	illance Requ	uirements				
Settlement plate structures Manholesb Sediment ponds Evidence of: Structural instability Additional comments: Things appear to be in good condition. Signature: Date: 09/27/2023		gure 3-1, mus	t be walked during this inspection.				
Manholesb Sediment ponds Setiment ponds Structural instability Additional comments: Things appear to be in good condition. Date: 09/27/2023	Condition of:						
Sediment ponds	•						
Structural instability	Manholes ^b						
Structural instability	Sediment ponds						
Additional comments: Things appear to be in good condition. Signature: Date: 09/27/2023	Evidence of:						
Signature: Date: 09/27/2023	Structural instability						
	Additional comments: Things appear to be in good condition.						
	Signature:	Man					

^aInspections required following a significant storm event ^bOpen to inspect quarterly

MONTHLY CLIMATOLOGICAL SUMMARY for SEP. 2023

NAME: 1 CITY: STATE: ELEV: 0 ft LAT: LONG:

TEMPERATURE (°F), RAIN (in), WIND SPEED (mph)

D A V	MEAN TEMP	HIGH	TIME	LOW	TIME	HEAT DEG DAYS	COOL DEG DAYS	RAIN	AVG WIND SPEED	итси	TIME	DOM DIR
D/11	 T DEJE		. — — — — — — — — — — — — — — — — — — —		1 1145		DAIS		SEEDU		E TEME	DIK
1	70.7	79.9	2:30p	62.3	6:00a		6.0	0.00	7.1	22.0	11:30a	SSW
2	66.1	76.7	5:30p	55.7	7:00a		3.3	0.01	5.2	21.0	12:30a	SSE
3	65.7	76.2	5:00p	56.3	7:00a		2.9	0.00	6.5	25.0	4:00p	S
4	62.6	73.3	4:00p	50.2	7:00a	4.5	2.0	0.00	7.0	29.0	12:00p	S
5	63.5	75.8	4:30p	48.9	7:00a		3.1	0.00	6.1	22.0	11:30a	WNW
6	65.3	78.0	4:30p	50.1	7:00a		4.1	0.00	6.3	30.0	1:30p	S
7	69.2	81.1	4:30p	55.7	6:30a	1.8	6.0	0.00	6.4	27.0	2:00p	WSW
8	70.1	83.3	5:00p	52.2	7:00a	1.7	6.8	0.00	5.7	21.0	12:30p	SW
9	70.3	80.6	5:30p	58.6	6:00a	1.1	6.3	0.00	5.3	24.0	11:00p	NM
10	64.4	78.6	1:00p	54.9	12:00m		2.2	0.02	6.3	33.0	2:00p	NW
11	61.5	74.3	3:00p	48.3	6:00a	5.5	2.0	0.00	4.2	15.0	1:00p	W
12	59.2	70.7	2:00p	52.6	11:30p		0.5	0.04	6.3	24.0	5:00p	S
13	57.7	69.4	4:30p	51.2	7:00a	7.7	0.4	0.01	4.1	20.0	12:30a	S
14	54.6	63.8	4:00p	49.1	6:30a		0.0	0.27	4.3	15.0	10:30a	WSW
15	55.2	63.5	4:00p	48.3	12:00m		0.0	0.02	3.8	21.0	4:30p	W
16	58.1	72.0	5:00p	45.8	7:30a		1.1	0.00	3.6	13.0	12:30p	W
17	61.4	73.3	4:00p	49.4	5:00a	5.5	2.0	0.00	5.3	21.0	2:00p	WSW
18	61.4	74.2	4:00p	51.2	12:00m	4.8	1.2	0.01	6.3	24.0	3:00p	S
19	59.3	71.0	1:30p	48.2	5:00a		0.8	0.00	5.3	16.0	9:30a	SSW
20	61.2	71.0	5:00p	52.8	4:30a	4.9	1.1	0.00	9.0	27.0	4:00p	S
21	58.4	71.0	4:30p	43.5	6:00a	7.6	1.0	0.00	9.9	34.0	5:30p	S
22	58.0	70.3	5:00p	41.7	7:00a	7.8	0.8	0.00	6.4	28.0	1:30p	S
23	57.8	67.6	5:00p	49.8	6:00a	7.2	0.1	0.00	6.6	22.0	3:30p	MNM
24	57.7	71.9	5:00p	43.9	7:30a	8.3	0.9	0.00	4.4	15.0	2:00p	WSW
25	60.3	74.3	4:30p	45.7	3:00a	7.0	2.3	0.00	4.5	15.0	4:00p	WSW
26	63.3	75.7	4:00p	53.3	7:30a	4.8	3.1	0.00	5.8	18.0	3:00p	WSW
27	63.2	75.4	4:30p	51.3	7:30a	4.7	2.9	0.00	6.2	22.0	2:00p	WSW
28	62.6	73.8	4:30p	49.7	7:00a	4.5	2.1	0.00	6.6	28.0	3:30p	S
29	60.9	73.1	4:00p	46.5	6:30a	6.0	1.9	0.00	6.8	25.0	1:30p	SSE
30	63.1	74.7	4:00p	48.9	7:00a	4.4	2.5	0.00	10.9	37.0	1:00p	S
	62.1	83.3	8	41.7	22	156.5	69.4	0.38	6.1	37.0	30	S

Max >= 90.0: 0Max <= 32.0: 0

Min <= 32.0: 0

Min $\leq 0.0:$ 0

Max Rain: 0.27 ON 09/14/23

Days of Rain: 4 (>.01 in) 1 (>.1 in) 0 (>1 in)

Heat Base: 65.0 Cool Base: 65.0 Method: Integration

Appendix B

Graphs Showing Performance History for Disposal Cell and Pond 4 LCRS and LDS

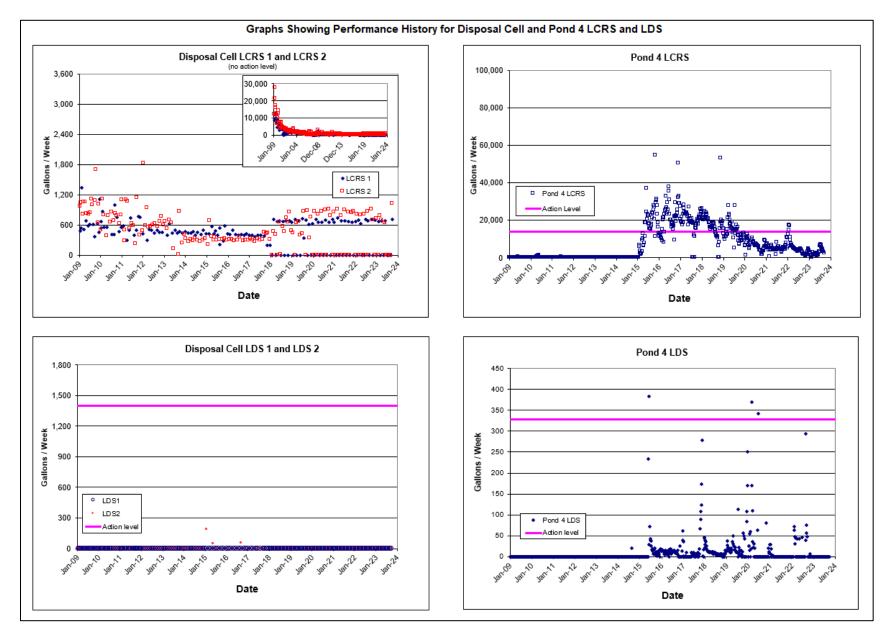


Figure B-1. Graphs Showing Performance History for Disposal Cell and Pond 4 LCRS and LDS