

Monticello, Utah, National Priorities List (NPL) Sites Federal Facility Agreement (FFA) Quarterly Report:

October 1-December 31, 2022

March 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
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 October 1 through December 31, 2022. 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 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* (DOE 2003). 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 as planned during this quarter (maintenance was performed on the system that necessitated shutting the system down for brief periods during the reporting period) and pumped approximately 521,000 gallons of water from the AOA.
- The previous period's Federal Facility Agreement (FFA) quarterly report was sent to EPA and UDEQ in December 2022.

- 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).
- Thirteen informational letters were mailed on December 22, 2022, to certain landowners in
 the Monticello area that explained use restrictions on their properties because of radiological
 contamination remaining in their land and in groundwater beneath their land. The letters
 were recommended by EPA and UDEQ in the July 2022 MMTS CERCLA Five-Year
 Review report.
- Representatives from the Emergency Management group were onsite on December 7, 2022, to conduct an emergency evacuation drill. Due to snowy site conditions, a tabletop discussion was held to simulate the event.

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 (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.
- One excavation occurred in a city street this quarter. Site personnel radiologically surveyed the removed soils from the excavation, and no radiologically contaminated materials were found.
- Neither excessive erosion nor unauthorized excavations were observed at the
 U.S. Highway 191 embankment at Montezuma Creek (supplemental standards property).
- 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- 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; 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 710 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. See Appendix B for a graphical depiction of leachate production history.
- 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 (see Appendix B)

3.1.2 TSF

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

• Approximately 6 cubic yards of soil excavated from the city streets is stored in the TSF

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 properties for day use as a public park.

Surveillance results for this quarter revealed:

• No nonconformance with water- 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 (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- 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 April 2023.

The contaminated groundwater is within the alluvial aquifer beneath the valley of Montezuma Creek; some sections of Montezuma Creek 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) pump-and-treat 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) treatment by a zero-valent iron (ZVI) in situ permeable reactive barrier (PRB) and (2) pump-and-treat 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 Groundwater Remedy Optimization 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).

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 521,000 gallons, equivalent to an average flow rate of 3.93 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 August 2, 2022 (the date of the most recent sample collected), approximately 2.1 pounds of uranium were removed during this quarter.
- During the quarter, the volume of water stored in Pond 4 increased by approximately 210,000 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 28,800,000 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 8.7 and 12.0 pore volumes since system startup.
- From January 2015 through August 2, 2022, the GRO system removed approximately 142 pounds of uranium from the AOA aquifer (Table 2). Estimates of 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)
October 2022	0.19	4.23	28.4
November 2022	0.17	4.03	28.6
December 2022	0.16	3.54	28.8

Note:

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

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)
March 2, 2022	510	1.03	4.7	138
August 2, 2022	480	1.03	4.3	142

Notes:

- ^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.

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

Several scenarios are being evaluated to develop a closure strategy for OU III, and these are detailed in the *OU III Closure Strategy for the Monticello Mill Tailings Site, Monticello, Utah* (DOE 2018). These scenarios include MNA and ICs, with remedy transition, decommissioning, and long-term monitoring (Scenario 1); GRO system termination based on asymptotic trends before transitioning to MNA and ICs (Scenario 2); and evaluation of alternative technologies and a technical impracticability waiver (Scenario 3). Efforts to determine the best possible closure strategy include hydrogeologic and geochemical characterization along with 3D numerical fate and transport modeling to forecast remedial time frames.

With regard to the OU III closure strategy, LM continued to develop the draft Feasibility Study for OU III during this quarter.

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

Revising the Quality Assurance Project Plan, Monticello, Utah, Disposal and Processing Sites (LM-Plan-3-21-1.0, LMS/MNT/S27252) Monticello, Utah, National Priorities List (NPL) Sites Federal Facility Agreement (FFA) Quarterly Report: July 1—September 30, 2022 Sixth CERCLA 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 2022b) Sixth Five-Year Review Report for Monticello Radioactively Contaminated Properties Superfund Site, San Juan County, Monticello, Utah (DOE 2022c) Five-Year Review Addendum activities include the following: DOE to create and send an informational letter to landowners with deed restrictions that clearly explains restrictions on their property DOE to update the Uniform Federal Policy-Quality Assurance Project Plan, Sampling and Analysis Plan, Program Directive 2021-10-MNT, and the LTS&M Plan to be consistent with regard to 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 to evaluate whether ICs are required to prevent human	Activity or Deliverable	Schedule
Agreement (FFA) Quarterly Report: July 1—September 30, 2022 Sixth CERCLA 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 2022b) Sixth Five-Year Review Report for Monticello Radioactively Contaminated Properties Superfund Site, San Juan County, Monticello, Utah (DOE 2022c) Five-Year Review Addendum activities include the following: DOE to create and send an informational letter to landowners with deed restrictions that clearly explains restrictions on their property DOE to update the Uniform Federal Policy-Quality Assurance Project Plan, Sampling and Analysis Plan, Program Directive 2021-10-MNT, and the LTS&M Plan to be consistent with regard to 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 Submitted to EPA and UDEQ on May 2, 2022 Submitted to EPA and UDEQ on May 2, 2022 Submitted to EPA and UDEQ on May 2, 2022 Submitted to EPA and UDEQ on May 2, 2022 Submitted to EPA and UDEQ on May 2, 2022 Submitted to EPA and UDEQ on May 2, 2022 Submitted to EPA and UDEQ on May 2, 2022		EPA and UDEQ on December 20, 2021; a second revision was submitted on November 8, 2022; additional comments were received from EPA and UDEQ on January 17, 2023. Comments were addressed and
Sixth Five-Year Review Report for Monticello Mill Tailings (USDOE) Site, San Juan County, Monticello, Utah (DOE 2022b) Sixth Five-Year Review Report for Monticello Radioactively Contaminated Properties Superfund Site, San Juan County, Monticello, Utah (DOE 2022c) Five-Year Review Addendum activities include the following: DOE to create and send an informational letter to landowners with deed restrictions that clearly explains restrictions on their property DOE to update the Uniform Federal Policy-Quality Assurance Project Plan, Sampling and Analysis Plan, Program Directive 2021-10-MNT, and the LTS&M Plan to be consistent with regard to 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 May 2, 2022 Proposed Dates for addendum documents: Informational letters submitted on December 22, 2022 Quality Assurance Project Plan update submitted on November 8, 2023 Feasibility Study due May 31, 2023 Risk Evaluation due May 31, 2023 IC Evaluation due May 31, 2023	Agreement (FFA) Quarterly Report: July 1–September 30, 2022	
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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), 2003. *Monticello Site Management Plan*, GJO-2003-493-TAC, Section 5.0 (this section is continually updated), Grand Junction Office, Grand Junction, Colorado, October.
- 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. *Monticello, Utah, National Priorities List (NPL) Sites Federal Facility Agreement (FFA) Quarterly Report: July 1–September 30,2022*, LMS/MNT/42768, Office of Legacy Management, January.
- DOE (U.S. Department of Energy), 2022b. 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), 2022c. 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.
- 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.
- 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

Inspection Item	Acce	ptable	Comments and Recommendation
	Yes	No	
Condition of:			
Fences, gates, and locks	\boxtimes		
Roads	\boxtimes		
Signs	\boxtimes		2
Visible piping	\boxtimes		
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			
Surrounding area			
Seepage from Pond 4	\boxtimes		
Overtopping of Pond 4	\boxtimes		
Evidence of:			
Vandalism	\boxtimes		
Intrusion by wildlife			
Intrusion by humans	\boxtimes		
Accumulation of trash	\boxtimes		
Additional comments: Things	appear to be	in good co	ondition.

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

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April 19, 2021



Repository Area Surveillance Checklist

Storm event triggered surveillance due to inches of rainfall over the past 24 hours.	
Inspection Item Acceptable Comments and Recommendation Yes No	
Condition of:	
Fences, gates, and locks	
Roads ^a	
Signs 🖂 🗀	
Site monuments	
Drainage ditches ^a	
Manholes 🖂 🗆	
Vegetation 🖂 🗆	
Evidence of erosion of:	
Top of disposal cell ^a	
Disposal cell sideslopes ^a	-
Ditches \Box	
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.	
Digitally signed by Gary L. McKinnon	
Signature: Date: 2022.10.31 11:53:21 -06'00' Date: 10/31/2022	
Monticello LM Representative alnspections required following a significant storm event	

LMS 5502 MNT

^bOpen to inspect quarterly

MONTHLY CLIMATOLOGICAL SUMMARY for OCT. 2022

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	55.0	64.7	4:00p	45.2	12:30a	10.0	0.0	0.01	6.9	25.0	11:30p	SSE	
2	52.8	62.7	5:00p	45.9	8:30p	12.2	0.0	0.68	7.1	35.0	7:30p	SSE	
3	51.7	60.3	5:30p	44.0	5:30a	13.3		0.01	5.1	17.0	9:30a	S	
4	54.1	64.1	2:00p	45.0	6:30a	10.9	0.0	0.00	5.7	18.0	4:00p	M	
5	54.8	64.2	2:30p	45.5	7:30a	10.2	0.0	0.00	5.1	17.0	4:30p	M	
6	54.5	66.2	4:30p	42.9	7:30a	10.5	0.0	0.00	2.8	14.0	3:00p	S	
7	55.9	67.3	4:00p	48.0	6:30a	9.2	0.1	0.00	5.0	15.0	2:30p	S	
8	55.2	66.9	4:00p	47.3	1:00a	9.8	0.1	0.00	5.0	16.0	9:00a	S	
9	53.8	65.4	3:00p	46.1	11:30p	11.2	0.0	0.00	5.6	19.0	4:30p	S	
10	53.3	66.1	6:00p	41.7	7:00a		0.0	0.00	3.9	14.0	5:30p	SW	
11	55.0	67.4	4:00p	41.9	7:00a	10.2	0.2	0.00	4.8	18.0	5:00p	SE	
12	57.3	68.1	3:00p	45.2	8:00a	8.2	0.5	0.00	6.3	17.0	3:30p	M	
13	56.8	67.9	2:30p	46.4	7:30a	8.5	0.3	0.00	6.6	21.0	3:30p	WNW	
14	55.4	68.4	4:00p	41.4	5:30a	10.1	0.5	0.00	4.8	18.0	2:30p	NNW	
1.5	55.9	69.0	4:30p	45.0	4:00a	9.7	0.6	0.00	4.3	14.0	1:30p	SW	
16	50.7	60.5	3:30p	42.9	8:00a	14.3	0.0	0.22	4.3	25.0	4:30p	WNW	
17	48.7	59.6	3:30p	37.3	6:30a	16.3	0.0	0.00	4.1	14.0	5:30p	S	
18	50.8	63.5	3:00p	36.9	7:30a	14.2	0.0	0.00	4.4	17.0	3:00p	MNM	
19	54.1	67.3	2:30p	45.0	7:30a	11.1	0.2	0.00	4.7	17.0	3:30p	WSW	
20	53.9	66.0	2:30p	43.1	6:00a	11.2	0.1	0.00	4.8	16.0	1:00p	SW	
21	52.2	63.9	2:00p	38.1	8:00a	12.8	0.0	0.00	6.9	24.0	2:00p	SSW	
22	51.7	61.1	4:00p	39.5	7:00a	13.3	0.0	0.00	13.6	42.0	10:00p	SSE	
23	37.1	51.6	1:00a	29.7	10:00p	27.9	0.0	0.36	11.1	38.0	1:00a	NW	
. 24	31.0	38.1	3:30p	26.2	6:30a		0.0	0.00	12.9	32.0	1:00a	NW	
25	37.7	49.9	3:00p	25.7	5:30a		0.0	0.00	3.3	18.0	2:00p	SE	
26	42.9	51.5	3:30p	34.0	8:30a	22.1	0.0	0.00	6.3	25.0	11:00a	S	
27	31.6	45.0	12:30a	25.6	7:30a	33.4	0.0	0.00	18.2	40.0	12:00p	ИМ	
28	36.0	49.6	2:30p	24.3	7:00a	29.0	0.0	0.00	4.0	17.0	12:30a	SE	
29	38.5	50.1	2:30p	28.3	2:30a	26.5	0.0	0.00	3.4	16.0	11:00p	WSW	
30	42.0	52.0	3:00p	31.5	5:30a	23.0	0.0	0.00	7.5	21.0	3:30p	WNW	
31	44.2	57.2	3:30p	34.6	8:00a	20.8	0.0	0.00	4.5	13.0	11:30a	WNW	
	49.2	69.0	15	24.3	28	492.9	2.6	1.28	6.2	42.0	22	S	

Max >= 90.0: 0

Max <= 32.0: 0

 $Min \le 32.0: 7$

Min <= 0.0: 0

Max Rain: 0.68 ON 10/02/22

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

Heat Base: 65.0 Cool Base: 65.0 Method: Integration



Monthly Pond 4 Surveillance Checklist

Inspection Item	Acce	otable	Comments and Recommendation
·	Yes	No	
Condition of:	14,		
Fences, gates, and locks	\boxtimes		
Roads	\boxtimes		
Signs	\boxtimes		
Visible piping	\boxtimes		
Visible liner and anchors	\boxtimes		
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			-
Intrusion by humans	\boxtimes		
Accumulation of trash	\boxtimes		-
Additional comments: There is	s a skiff of sn	ow on the	ground but things appear to be in good condition.

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

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April 19, 2021



Repository Area Surveillance Checklist

	Quar	rterly sur	rveillance: 🗌 February 🔲 May 🔲 August 🖾 November
☐ Storm event triggered s	urveilland	e 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	\boxtimes		
Roads ^a	\boxtimes		2
Signs	\boxtimes		
Site monuments	\boxtimes		
Drainage ditches ^a	\boxtimes		
Manholes	\boxtimes		
Vegetation	\boxtimes		
Evidence of erosion of:		_	
Top of disposal cella	\boxtimes		
Disposal cell sideslopes ^a	\boxtimes		
Ditches	\boxtimes		
Surrounding area	\boxtimes		e e e e e e e e e e e e e e e e e e e
Evidence of:			
Vandalism	\boxtimes		
Intrusion by livestock	\boxtimes		
Burrowing animal damage	\boxtimes		
Intrusion by humans	\boxtimes		
Accumulation of trash	\boxtimes		
Additional Quarterly Surv	eillance	Require	ements
Note: All transects, shown in F	igure 3-1	, must be	walked during this inspection.
Condition of:			
Settlement plate structures	\boxtimes		
Manholes ^b	\boxtimes		
Sediment ponds	\boxtimes		
Evidence of:			
Structural instability	\boxtimes		
Additional comments: A	skiff of sr	now is or	n the ground but things appear to be in good condition.
Canal	//cl/iv	non	Digitally signed by Gary L. McKinnon
Signature: Gary L. N	VICKII		Date: 2022.11.30 08:17:05 -07'00' Date: 11/30/2022
		Monticel	lo LM Representative

^aInspections required following a significant storm event

^bOpen to inspect quarterly

LMS 5502 MNT

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April 19, 2021

MONTHLY CLIMATOLOGICAL SUMMARY for NOV. 2022

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	44.2	55.8	4:00p	34.4	3:00a	20.8	0.0	0.00	7.8	29.0	1:30p	SSE
2	45.7	53.9	2:30p	33.6	7:30a		0.0	0.00	14.4	42.0	12:30p	SSE
3	33.2	44.2	12:30a	26.9	12:00m	31.8	0.0	0.12	6.8	34.0	12:30a	SSE
4	27.9	33.2	4:30p	23.5	10:00p		0.0	0.00	9.3	27.0	4:30a	NW
5	33.0	40.7	2:30p	24.1	1:00a	32.0	0.0	0.02	6.5	23.0	12:30p	SE
6	42.7	51.1	2:30p	35.8	5:00a	22.3	0.0	0.00	11.9	27.0	12:30p	S
7	46.3	56.8	3:30p	38.9	12:00m	18.7	0.0	0.00	12.1	33.0	4:30p	SSE
8	47.3	56.1	3:30p	38.0	12:30a	17.7	0.0	0.00	18.1	38.0	12:00m	SSE
9	37.3	47.8	12:30a	22.7	12:00m	27.7	0.0	0.06	14.1	47.0	10:30a	SSE
10	25.6	36.2	1:00p	15.9	7:00a	39.4	0.0	0.00	2.8	17.0	4:00p	NW
11	25.2	34.7	3:00p	17.9	2:30a	39.8	0.0	0.00	7.1	20.0	6:30a	NM
12	28.4	37.9	3:00p	16.0	6:30a	36.6	0.0	0.00	6.8	27.0	3:00p	SSE
13	34.4	4,2.6	2:30p	30.3	6:00p	30.6	0.0	0.00	7.6	22.0	9:30p	S
14	28.8	34.1	2:00p	23.3	12:00m	36.2	0.0	0.00	11.1	31.0	8:30a	MNM
15	25.0	31.3	2:00p	19.9	7:00a		0.0	0.00	9.3	25.0	3:00p	NM
16	26.8	35.0	2:30p	20.8	7:30p		0.0	0.00	6.6	25.0	4:00a	NW
17	28.2	41.5	2:30p	16.6	6:30a	36.8	0.0	0.00	0.0	14.0	12:30p	SE
18	28.5	37.7	1:30p	22.1	1:30a	36.5	0.0	0.00	5.2	22.0	4:00p	SSE
19	26.9	38.4	3:00p	18.4	2:30a		0.0	0.00	6.3	19.0	3:00a	SSE
20	29.6	43.8	2:30p	17.1	5:00a		0.0	0.00	2.7	18.0	3:30p	NNW
21	31.6	47.2	2:00p	18.3	5:30a		0.0	0.00		8.0	11:00a	SSE
22	32.8	47.9	3:00p	23.9	1:30a		0.0	0.00		6.0	12:00p	WSW
23	29.9	41.4	12:30p	18.0	6:30a		0.0	0.00	7.4	33.0	1:30p	NW
24	31.3	37.9	12:30p	25.8	6:00a		0.0	0.00	15.6	30.0	3:30a	NW
25	34.3	48.4	3:30p	23.8	6:00a	30.7	0.0	0.00	3.4	19.0	1:00a	NNW
26	36.0	50.2	2:30p	24.3	5:30a	29.0	0.0	0.00	4.4	25.0	9:30p	NM
27	34.1	42.6	3:00p	27.8	2:30a	30.9	0.0	0.00	9.3	27.0	11:00p	NM
28	33.1	40.1	4:00p	25.4	4:00a	31.9	0.0	0.00	13.4	37.0	2:00p	SSE
29	21.1	35.5	12:30a		11:30p		0.0	0.00	8.6	38.0	11:00a	
30	28.7	38.5	3:00p	6.7	2:00a	36.3	0.0	0.00	4.8	26.0	9:30a	S
_	32.6	56.8	7	5.8	29	972.2	0.0	0.20	7.8	47.0	9	SSE

Max >= 90.0: 0Max <= 32.0: 1

Min <= 32.0: 25

 $Min \le 0.0: 0$

Max Rain: 0.12 ON 11/03/22

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

Heat Base: 65.0 Cool Base: 65.0 Method: Integration



Monticello Long-Term Surveillance and Maintenance Temporary Storage Facility (TSF) Record Book Inspection Report

Are t	hese	areas acceptable?
Yes	No	
\boxtimes		Was the gate locked upon arrival?
		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.
		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 $10~\mathrm{CFR}~835.405[\mathrm{d}]?$
\boxtimes		Is the security fence in good condition?
Com	ments	
The	concr	ete hin contains 6 cubic yards of radiologically contaminated material

Tyler McDougall Tyler McDougall 2022.11.29 10:03:01 -07'00'

11/29/2022



Monthly Pond 4 Surveillance Checklist

Inspection Item	Acce	otable	Comments and Recommendation		
	Yes	No			
Condition of:					
Fences, gates, and locks	\boxtimes				
Roads	\boxtimes				
Signs	\boxtimes				
/isible piping	\boxtimes				
visible liner and anchors	\boxtimes				
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					
Overtopping of Pond 4	\boxtimes				
Evidence of:					
/andalism	\boxtimes				
ntrusion by wildlife	\boxtimes				
ntrusion by humans	\boxtimes				
Accumulation of trash					
Additional comments: There is	a few inches	s of snow	on the ground but things appear to be in good conditior		

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

Page 1 of 1 April 19, 2021



Repository Area Surveillance Checklist

	Quar	terly su	urveillance: ☐ February ☐ May ☐ August ☐ November								
☐ Storm event triggered s	urveilland	e due	to inches of rainfall over the past 24 hours.								
Inspection Item	Accep Yes	table No	Comments and Recommendation								
Condition of:											
Fences, gates, and locks	\boxtimes		K .								
Roads ^a	\boxtimes										
Signs	\boxtimes										
Site monuments	\boxtimes										
Drainage ditches ^a	\boxtimes										
Manholes	\boxtimes										
Vegetation	\boxtimes										
Evidence of erosion of:											
Top of disposal cella	\boxtimes										
Disposal cell sideslopes ^a	\boxtimes		1 Ye 74 7000 1000 1000 1000 1000 1000 1000 1								
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								
Note: All transects, shown in a	Figure 3-1,	must b	ne walked during this inspection.								
Condition of:											
Settlement plate structures											
Manholes ^b											
Sediment ponds											
Evidence of:											
Structural instability											
Additional comments: There is a few inches of snow on the ground but things appear to be in good condition.											
Signature: Gary L. McKinnon Digitally signed by Gary L. McKinnon Date: 2022.12.30 07;18:34 -07'00' Date: 12/30/2022											
Signature: Gary L. IVICNIIIIOI Date: 2022.12.30 07:18:34 -07'00' Date: 12/30/2022											

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

MONTHLY CLIMATOLOGICAL SUMMARY for DEC. 2022

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	37.5	43.8	3:30p	31.2	2:00a	27.5	0.0	0.00	12.3	36.0	12:00p	 S	
2	36.6	46.4	1:00p	25.5	9:00p		0.0	0.00	8.2	44.0	4:30a	S	
3	38.4	44.1	2:00p	29.2	12:30a		0.0	0.00	0.3	17.0	11:30a	SSE	
4	42.3	45.6	3:30p	40.1	2:00a	22.7	0.0	0.00	6.4	20.0	10:30a	S	
5	38.8	43.3	2:30p	32.4	12:00m	26.2	0.0	0.00	7.6	21.0	11:00a	SSE	
6	32.9	38.5	1:00p	27.7	4:00a	32.1	0.0	000	2.0	12.0	4:30a	NNW	
7	32.1	36.6	4:30p	24.6	12:00m	32.9	0.0	0.26	5.5	24.0	5:00p	SSE	
8	23.7	32.2	3:30p	14.9	6:30a	41.3	0.0	0.02	1.0	20.0	1:00a	SE	
9	26.6	34.3	3:00p	20.5	11:00p	38.4	0.0	0.00	4.5	23.0	11:30a	SSE	
1.0	31.7	38.1	2:30p	20.0	12:30a		0.0	0.00	7.9	23.0	11:00p	S	
11	36.7	43.1	3:30p	30.7	6:00a	28.3	0.0	0.00	10.8	32.0	9:30a	S	
12	26.0	37.1	12:30a	12.5	10:00p	39.0	0.0	0.01	5.6	37.0	1:30a	S	
13	18.4	27.1	1:00p	8.3	3:30a		0.0	0.01	2.7	15.0	12:00m	SW	
14	21.2	28.0	2:00p	13.2	10:30p		0.0	0.00	6.5	21.0	3:00p	WM	
15	19.2	24.9	10:00a	12.0	4:00a		0.0	0.00	6.4	27.0	1:30p	NM	
16	14.3	20.3	2:30p	6.3	7:30a		0.0	0.00	4.0	19.0	5:00a	ИM	
17	15.1	28.7	2:30p	4.4	12:00m		0.0	0.00	0.4	5.0	6:00p	SSE	
18	19.2	30.6	2:00p	2.6	12:30a		0.0	0.00	3.1	19.0	2:30p	SSE	
19	21.3	36.1	3:30p	10.1	2:00a		0.0	0.00	0.0	4.0	12:00m	NE	
20	25.4	31.9	1:00p	13.5	4:00a		0.0	0.00	2.3	19.0	5:00p	SSE	
21	26.8	37.7	1:00p	17.6	11:00p		0.0	0.00	1.6	20.0	12:00p	S	
22	30.9	36.8	2:00p	24.1	4:30a		0.0	0.00	1.5	23.0	5:00a	WNW	
23	29.8	36.6	1:00p	23.9	12:00m		0.0	0.00	2.9	19.0	3:00p	WNN	
24	32.7	40.5	1:00p	23.0	8:00a		0.0	0.00	4.3	24.0	11:30a	NW	
25	36.8	45.0	2:00p	26.5	7:30a		0.0	0.00	8.0	27.0	12:00m	SSE	
26	38.9	47.8	2:30p	31.3	6:00a		0.0	0.00	3.1	28.0	1:00a	SSE	
27	35.9	39.3	8:30p	32.2	7:00a		0.0	0.05	3.9	28.0	10:00p	SSE	
28	29.1	32.8	12:30a	18.1	8:30p		0.0	0.02	8.5	29.0	3:30p	SSE	
29	23.3	27.8	1:00p	14.1	6:30a		0.0	0.01	1.2	23.0	12:30a	SSE	
30	27.5	30.7	8:30p	23.6	2:30a		0.0	0.00	4.9	31.0	12:00m	SSE	
31	33.8	35.9	4:30p	29.6	1:30a	31.2	0.0	0.07	15.1	37.0	5:30a	S	
	29.1	47.8	26	2.6	18	1112.1	0.0	0.45	4.9	44.0	2	SSE	_

Max >= 90.0: 0

Max <= 32.0: 9

Min <= 32.0: 28

Min <= 0.0: 0

Max Rain: 0.26 ON 12/07/22

Days of Rain: 5 (>.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

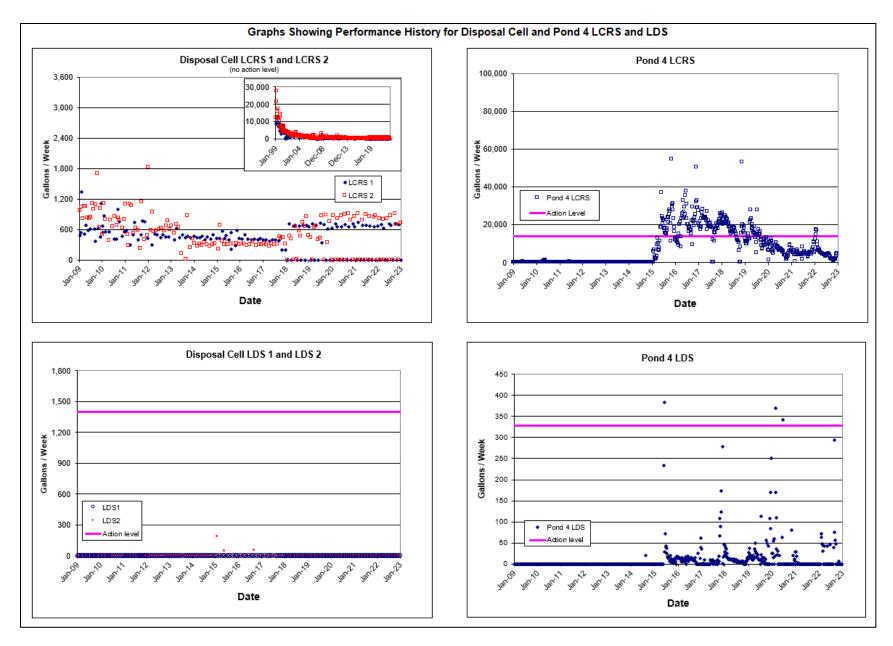


Figure B-1. Graphs Showing Performance History for Disposal Cell and Pond 4 LCRS and LDS