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July 9, 1993

TO: Wayne Hedberg, Minerals Permit Supervisor

FROM: Holland Shepherd, Senior Reclamation Specialist HWS

SUBJECT: Bingham Canyon Mine Permitting, Kennecott Corp., M/035/002, Salt Lake County, Utah

I recently inspected the Bingham Canyon Mine site, June 18, 1993. Because of the immense size of the operation, I was only able to inspect a small part of it. Also, the size and complexity of the site make it difficult to cover all the necessary issues in one day. It is recommended that more time be spent in looking over the remainder of the site. Also, it is important that the Division keep up with some of the major changes taking place at the site, which have a lot to do, in part, with the ongoing CERCLIS clean-ups and reclamation. I have summarized below some of the major issues/items that the Division should be concerned about, related to the Bingham site:

1. There are 8 sites listed on CERCLIS and 6 other sites, which Kennecott is addressing as part of a current environmental compliance and action program. The EPA and DEQ/DERR have been working with Kennecott directly on the clean-up activities. Kennecott has requested that the Division review any of the project documents it deems to be a part of the mining operation, hence falling under state reclamation requirements. The Division has not, as yet, specifically identified these areas, because of work load constraints.

2. The operator is currently experimenting, on a very large scale with various reclamation techniques, on the East side and waste dumps. The Division should be maintaining close contact with the operator during the development and implementation of these applications. The operator has never provided materials analyses to the Division concerning the acidity and metals content of these waste materials. Also, the operator has been disturbing virgin areas associated with the clean-up and reclamation activities without the benefit of a

permit from the Division. The new mine quarry being used for the carbonate material is a case in point.

3. The operator has asked the Division to review plans for the East side Collection System (M/035/002) and the North Perimeter Site (M/035/015). We still haven't been able to get to these two plans although we've had them since the first of the year.

The operator has been keeping the Division well informed concerning new developments at the mine site. I have summarized below some of the submittals that the operator has presented to the Division and the associated dates. The items highlighted are ones which should require some type of Division review and response:

1. April 11, 1991 Kennecott - Voluntary Cleanup Activities: **CERCLIS** sites: Bingham Creek Tailings; Bingham Channel Groundwater Plume; Butterfield Waste Rock; State Motorcycle Park; Lark Waste Rock; Magna Tailings; Smelter Slag Pile and Lagoon; Kennecott Power Plant; **NON-CERCLIS** sites: South Jordan Evaporation Ponds; Kessler Canyon; Magna Soils; Diving Board Area Tailings; Wastewater Treatment Plant Sludge.

2. October 23, 1991, Butterfield Waste Rock Relocation Work Plan.

3. June 1991, Environmental Action Projects: East side Groundwater; Large Bingham Reservoir; Butterfield Waste Rock; Diving Board Area; Bingham Creek Groundwater Plume; State Motorcycle Park Tailings; Lark Waste Rock; South Jordan Evaporation Ponds; Magna Soils.

4. July 15, 1991, Runoff Control Plan for Kennecott Arthur Concentrator Reclaimed Ore Processing Area.

5. 1992 Annual Report of Mining Operations.

6. March 4, 1992, Supplemental Permit Information, Kennecott Utah Copper.

7. May 11, 1992 Kennecott Utah Copper Actions for the Bingham Creek Reservoir.

8. June 11, 1992, Response to Technical Review, Bluewater I Repository Installation and Reclamation Plans.

9. 1993 Reclamation Activities Plan.

10. January 1993, Update on Activities, Kennecott Utah Copper Corporation Bingham Canyon Mine: 1. Bingham Canyon Mine Ancillary Activities; Bluewater I Repository; Bingham Canyon Stormwater Reservoir; Sludge Removal and Placement; Eastside Collection System Modernization; Lark Mine Waste Rock Removal; Butterfield Mine Waste Rock Removal.

11. April 21, 1993 Arthur Concentrator Reclamation Report.

I would like to schedule a meeting with you and Tony, to discuss what is currently going on with the Bingham site. Maybe we should discuss what has been sent in and prioritize.

jb
M035002