

## **KENNECOTT BINGHAM CANYON MINE AND WATER COLLECTION SYSTEM EAST WASTE ROCK EXTENSION & SOUTH WASTE ROCK RECLAMATION PROGRESS REPORTING PLAN**

### Introduction

In association with the East Waste Rock Extension (EWRE) Project and the South Waste Rock Reclamation (SWRR) Projects, Kennecott Utah Copper LLC (Kennecott) is required to provide the Utah Division of Water Quality (DWQ) with periodic written progress reports detailing project status. The Utah Division of Response and Remediation (UDERR) will be copied on the progress reports to provide assurance that the modified collection system will continue to be protective of selected remedies under the CERCLA program. Project status will be reported on a quarterly basis for the duration of the project as specified in Part II, Section J, 5 of the permit. In addition, a final report summarizing project status and collection system operability will be submitted no later than 1 year after the completion of the project as specified in Part II, Section J, 7 of the permit. The completion of each project will be defined as the date which DWQ issues final written approval to operate the respective modified collection system.

Should either project be suspended, project status will be noted in the quarterly compliance monitoring well reports and detailed project reporting will resume once project activity resumes.

### Progress Reports General Structure

#### *Quarterly*

A reporting format for the quarterly reports is provided below and is intended to provide the author with key subject matter and provide the reader with consistent information. Depending upon the level of activity, progress reports will include information specific to the reporting period and may not include information in all areas listed below in Table H-1.

Table H-1: Progress Reporting Structure and Content Guidance

Section	Title	Guidance
1.0	Summary of Quarterly Activity	Overview of activities performed over the period
2.0	Quarterly Forecast of Activity	Six month look ahead broken out by month or activity
3.0	Engineering	General summary and provide detail as relevant to reporting period
3.1	Geotechnical	Foundation material related to collection system features
3.2	Design Modifications	Changes to design
4.0	Construction Activities	General summary and provide detail as relevant to reporting period
4.1	All that apply (walls, toe ditch, piping, pump station, overburden removal, new wells)	Include detail for each of the areas listed here that apply to the reporting period.
4.2	QA/QC	Summary of QA/QC activities for each component that applies

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5.0	Demolition Activities	General summary and provide detail as relevant to reporting period
5.1	All that apply (old walls, pipe, well abandonment)	Include detail for each of the areas listed here that apply to that reporting period.
6.0	Inspection	Regulatory related

Detailed environmental sampling related to the operability of the water collection system will be reported under the provisions of the current groundwater discharge permit in quarterly and annual report as well as correspondence where indicated by the permit. Kennecott will continue to sample the existing cut-off wall and collection system as described in the current permit. Upon implementation of construction of new cut-off walls, Kennecott will implement actions associated with items in Table H-2. A summary of these provisions is listed below:

Table H-2: Summary of Environmental Sampling Provisions

Provision	Section Reference
Future Modification of Monitoring Network	Part II, Section F, 1, a
Compliance Monitoring	Part II, Section F, 1, b
Sampling Protocol	Part II, Section F, 1, e
Operational Monitoring	Part II, Section F, 2
Monitoring Frequency	Part II, Section F, 3
Post Closure Monitoring	Part II, Section F, 4
Appendix A – Compliance Monitoring Plan	Inspection
	Spills and Overflows
	Seeps
	Groundwater Sampling
	Well Installation Protocol

## *Final*

The final report will summarize the key items listed in each of the quarterly reports but will focus on providing assurance that the new collection system is operating as designed. The report may also include items required by the approval to construct letter issued by DWQ. Items may include final QA/QC reports for pipe, liners and concrete; Operations and maintenance manual and as-built drawings. The final report will also reference and summarize applicable sections of the quarterly and annual groundwater discharge reports that document the operability of the modified collection system associated with the EWRE and SWRR projects.

## Reporting Schedule

### *Quarterly*

The quarterly EWRE and SWRR project progress reports shall be submitted to the Director on a schedule corresponding with quarterly compliance monitoring well reports as defined in Part I, Section I(1) of the permit. The EWRE and SWRR progress reports shall be submitted as an appendix to the quarterly compliance monitoring well reports.

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## *Final*

The report shall be submitted in accordance with Part II, Section J, 7 of the permit no later than one year after the completion of the project. The completion of each project will be defined as the date which DWQ issues final written approval to operate the respective modified collection system.

## General Provision

Future modification of EWRE and SWRR progress reporting. If at any time the Director determines the progress reports to be providing inadequate information the Director will provide in writing a request to Kennecott to address specifically listed items. Kennecott shall address progress report inadequacies by modifying the next scheduled quarterly report to address specifically listed items.