



# United States Department of the Interior



BUREAU OF LAND MANAGEMENT  
Monticello Field Office  
365 North Main, P.O. Box 7  
Monticello, UT 84535

June 2, 2021

In Reply Refer To:  
3809/3720(UTY-020)

CERTIFIED MAIL – RETURN RECEIPT  
7019 2970 0001 5522 9418

Mr. Nick Sandberg  
San Juan County commission  
P.O. Box 9  
Monticello, UT 84535

## **30-day Public Comment Period for Fry Canyon Engineering Evaluation Cost Analysis**

Dear Mr. Sandberg,

The Utah Bureau of Land Management (BLM) Monticello Field Office is currently working with the BLM Utah State Office to mitigate a historic mining related site located in Township 36 South, Range 16 East, Section 34 in San Juan County, Utah approximately 60 miles west of Blanding. An Engineering Evaluation/Cost Analysis (EE/CA) has been prepared to analyze removal action alternatives for the Fry Canyon Tailings Site. This EE/CA was prepared in accordance with the criteria established under the Comprehensive Environmental Response, Compensation and Liability Act, as well as sections of the National Oil and Hazardous Substance Pollution Contingency Plan applicable to removal actions.

The Fry Canyon Tailings Site consists of an upland tailings pile and a series of former holding ponds directly next to Fry Creek containing wastes from historical copper and uranium ore processing activities. A Human Health and Streamlined Ecological Risk Assessment was completed for the Site and found no significant risks for most chemicals and receptors (Weston 2012). However, slight exceedances of non-cancer risks were identified that were primarily associated with the tailings located in the settling ponds near Fry Creek.

The EE/CA discusses the site characterization, identifies the removal action scope, goals and objectives, and identifies and analyzes three removal alternatives. Each alternative was evaluated individually for effectiveness, implementability, and costs, which were then used in a comparative analysis to identify a preferred alternative.

The Monticello Field Office is posting the EE/CA for a 30-day public comment period on the BLM Land Use Planning and NEPA Register (ePlanning) at <https://eplanning.blm.gov/eplanning-ui/project/2013831>. The public comment period will begin

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INTERIOR REGION 7 • UPPER COLORADO BASIN

COLORADO, NEW MEXICO, UTAH, WYOMING

on June 3, 2021 and will end on **July 3, 2021**. Comments can be submitted directly on ePlanning or written comments can be mailed to: Attn: Robert James, Monticello Field Office, P.O. Box 7, Monticello, Utah 84535.

If you have any questions about the project, please contact Robert James, Geologist, at (435) 587-1526.

Sincerely,

**AMBER  
JOHNSON**

Digitally signed by AMBER  
JOHNSON  
Date: 2021.06.02 12:36:12  
-0600

Amber Denton Johnson  
Field Manager

cc:  
Utah State Office  
Attn: Terry Snyder  
440 West 200 South  
Suite 500  
Salt Lake City, UT 84101-1345

# Executive Summary

Ecology and Environment, Inc., member of WSP (hereafter referred to as E & E) has been retained under the Bureau of Land Management (BLM) Contract Number L14PA00149, Order Number 140L5719F0023 to prepare an Engineering Evaluation/Cost Analysis (EE/CA) for the Fry Canyon Tailings Site (Site). This EE/CA has been prepared in accordance with the criteria established under the Comprehensive Environmental Response, Compensation and Liability Act, (CERCLA), as well as sections of the National Oil and Hazardous Substance Pollution Contingency Plan (NCP) applicable to removal actions (40 Code of Federal Regulations § 300.415 [b][4][I]). The EE/CA is also consistent with the U.S. Environmental Protection Agency (EPA) guidance document, *Guidance on Conducting Non-Time Critical Removal Actions under CERCLA* (CERCLA Guidance; EPA 1993).

The Site consists of an upland tailings pile and a series of former holding ponds directly next to Fry Creek containing wastes from historical copper and uranium ore processing activities. A Human Health and Streamlined Ecological Risk Assessment was completed for the Site that found no significant risks for most chemicals and receptors (Weston 2012). However, slight exceedances of non-cancer risks were identified for the following contaminants of potential concern (COPC): arsenic, copper, radium-226, radium-228, uranium-234, uranium-235, uranium-238, thorium-230, and lead-210. The COPCs are primarily associated with the tailings located in the settling ponds near Fry Creek. Risk-based cleanup levels (RBCULs) were developed for potential human receptors at risk for the COPCs, which are generally protective for potential ecological receptors as well.

The Site characterization activities and risk assessment were evaluated to develop removal goals that protect human health and the environment while complying with Applicable or Relevant and Appropriate Requirements (ARARs). Per BLM guidance, attainment of acceptable risk levels at the Site will be determined by average residual concentrations at levels below RBCULs following the removal action. The following removal action objectives (RAOs) were established for the Site:

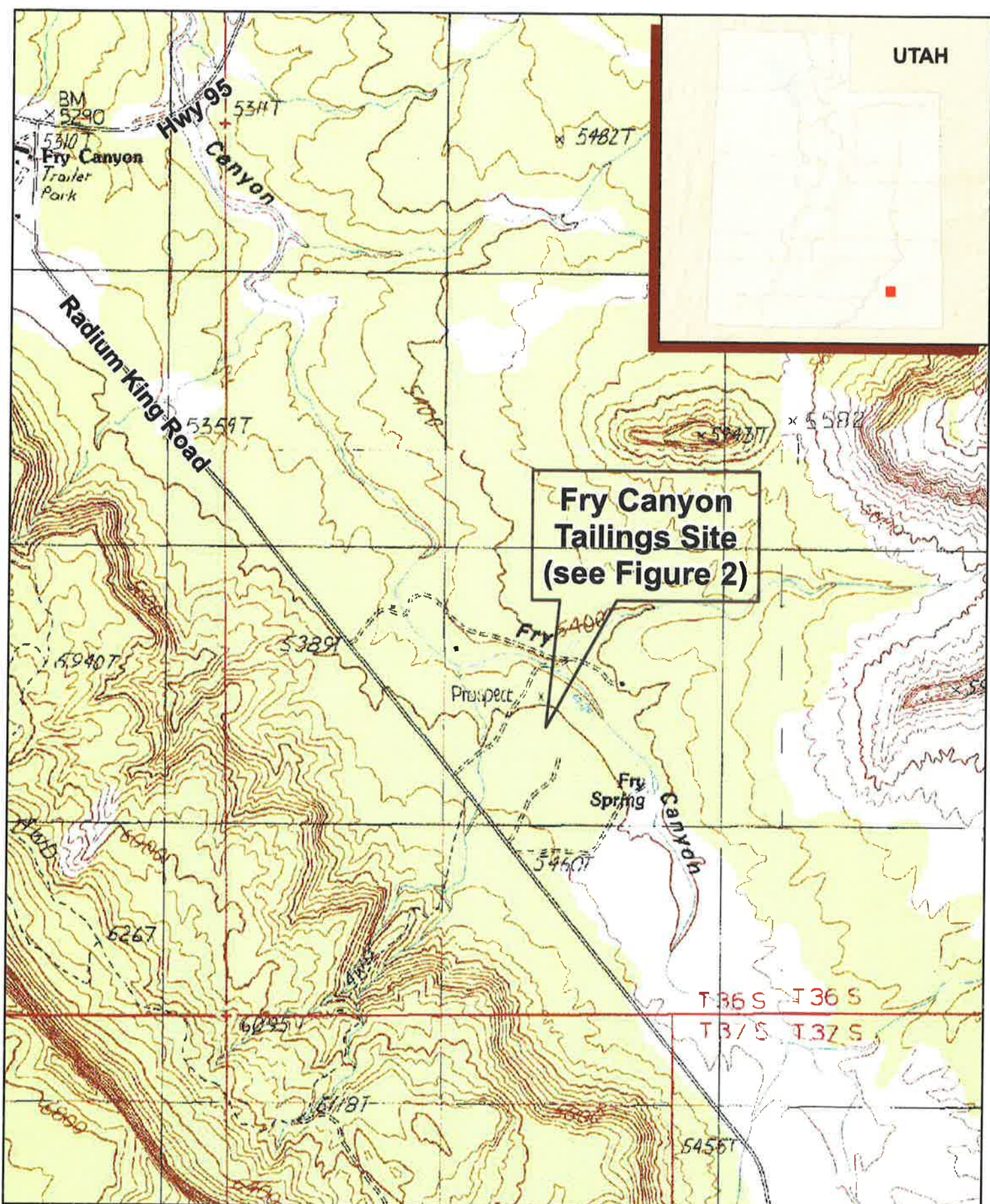
- Reduce risk to human and ecological receptors from mine waste constituents at the Fry Creek Site;
- Reduce potential for off-site migration of contaminants from the upland tailings pile and tailings ponds; and
- Reduce leaching potential from contaminants adjacent to Fry Creek.



The following removal action alternatives were developed based on a combination of appropriate general response actions and process technologies for the Site:

- Alternative 1 – No Action. This alternative is included as a baseline against which other alternatives are measured.
- Alternative 2 – In Situ Containment. This alternative consists of installing a concrete cap on the upland tailings pile and tailings ponds waste source areas, fencing the source areas, posting signage around fenced areas, maintenance and monitoring, and subsequent reviews.
- Alternative 3 – Waste Consolidation in an On-Site Repository. This alternative consists of moving portions of the tailings ponds waste away from the creek to the upland tailings area and covering them with 6 inches of vegetated soil. Alternative 3 also includes fencing and posting signs in the repository area, maintenance and monitoring, and subsequent reviews.

Each alternative was evaluated individually for effectiveness, implementability, and costs, which were then used in a comparative analysis to identify a preferred alternative. Alternative 3 provides the most protection of human health and the environment by removing contaminated tailings from the ponds and Fry Creek floodplain for consolidation and capping with the upland tailings pile that is located away from Fry Creek above the groundwater table. Alternative 3 utilizes mostly locally sourced materials and is less expensive compared to Alternative 2. Covering the repository with a vegetative soil cover will reduce exposure to human receptors and reduce the potential for off-site migration of COPCs. As a result, Alternative 3 is selected as the preferred alternative due to its higher degree of effectiveness, implementability, and lower cost while achieving RAOs for the Site.

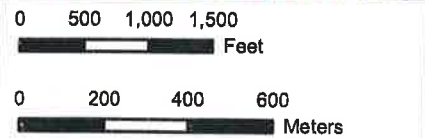


**Fry Canyon  
Tailings Site  
(see Figure 2)**

T 36 S T 36 S  
T 37 S T 37 S

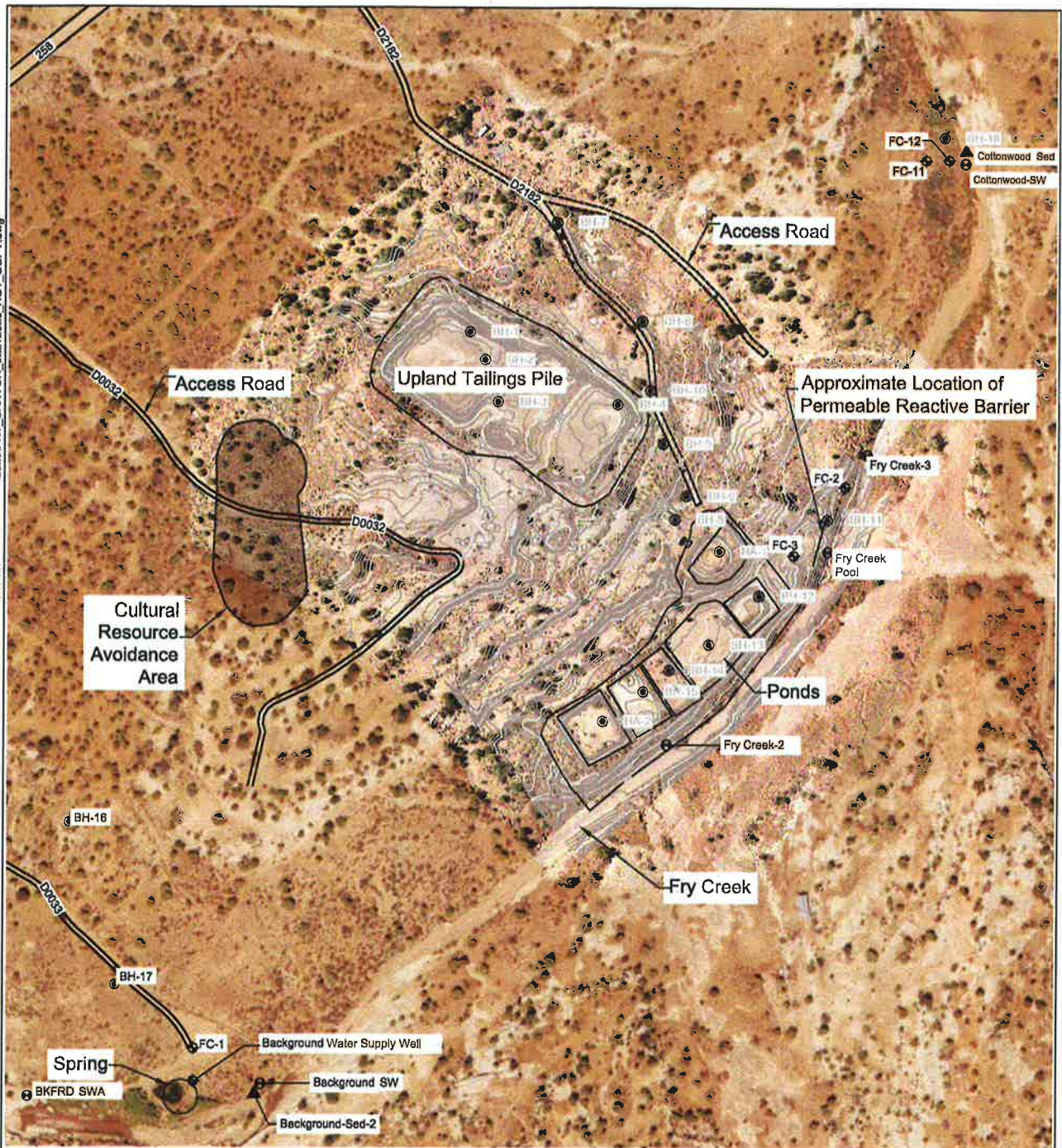
 ecology and environment, inc.  
International Specialists in the Environment

Datum: NAD 27  
Projection: UTM - Zone 12  
1 inch = 1,500 feet  
1 inch = 457 meters  
1:18,000



**Fry Canyon EECA  
Figure 1  
Site Map**

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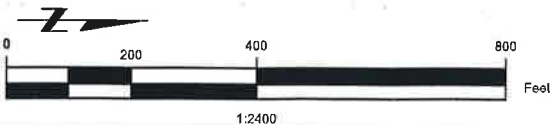


**Notes:**

- 1) All locations shown are approximate. The aerial photograph provided by the BLM received by E&E on July 16, 2010.
- 2) The contour map shown on this figure was generated by E&E using point data provided by Red Desert Land Surveying LLC. in October of 2019. Surveyed used a 2 hour static opus solution at #5 rebar control point for accurate project control. The project site was flown at 170 feet with survey drone producing 1.58 cm/0.62 in pixel. Survey grade GPS established 8 ground control points and approx. 400 ground check points.
- 3) Sampling locations are taken from SAIC's *Supplemental Characterization Report*, dated May 29, 2008.
- 4) Access road D0032 requires upgrades prior to use, including but not limited to replacement of an existing culvert. Access road D0032 shall not be used for removal action to avoid cultural resources. The western-most 600 feet of access road D2182 is encompassed in the Travel Management Plan. Approximately 1000 additional feet of D2182 is required to access the tailings and the Fry Canyon Drainage area.

**Legend**

- Borehole Locations (see Note 3)
- Fry Creek-2 Surface Water Sampling Location (see Note 3)
- Groundwater Water Sampling Location (see Note 3)
- Sediment Sampling Location (see Note 3)
- 5' Contour
- 1' Contour
- Designated Travel Management Plan Road
- Access road (see Note 4)



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|           |      |             |                |     |       |            |       |            |
|-----------|------|-------------|----------------|-----|-------|------------|-------|------------|
| DRAWN:    | KDW  | PROJECT NO: | 806271-001-010 |     |       |            |       |            |
| ENGINEER: | KJL  | SCALE:      | AS NOTED       |     |       |            |       |            |
| CHECKED:  | AM   | APPROVED:   | XXX            |     |       |            |       |            |
| NO.       | DATE | REVISIONS   | BY             | CHK | DATE: | 07/15/2020 | DATE: | 07/15/2020 |

ecology and environment, inc.  
 33 West Hovey St., Suite 1410, Chicago, IL 60643  
 Phone 312-679-8243 Fax 312-679-8242  
 www.eandenv.com



U.S. Department of Interior  
 Bureau of Land Management  
 Fry Canyon, Utah

**Fry Canyon EECA**  
 Existing Conditions and  
 Historical Sampling  
 Locations

|   |
|---|
| 2 |
| 4 |



Sandberg, Nick <nsandberg@sanjuancounty.org>

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## Attached Image

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Gail Johnson <gailjohnson459@gmail.com>  
To: "Sandberg, Nick" <nsandberg@sanjuancounty.org>

Tue, Jun 22, 2021 at 7:19 AM

Nick,

Attached is a copy of the letter I sent to the BLM regarding the Fry Canyon Mill Tailings project. We would appreciate a similar position from the county commission, at least as far as the top soil to be used in covering the tailings. Thanks for your help.

Gail

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**From:** Sandberg, Nick [mailto:nsandberg@sanjuancounty.org]  
**Sent:** Wednesday, June 9, 2021 9:51 AM  
**To:** gailjohnson459@gmail.com  
**Subject:** Fwd: Attached Image

Gail:

[Quoted text hidden]

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 Fry Canyon Mill Tailings June 2021.doc  
30K

**JOHNSON**  
HC 60 Box 220  
Lake Powell, UT 84533  
435-459-1268

June 22, 2021

Mr. Robert James, Geologist  
Bureau of Land Management  
P.O. Box 7  
Monticello, UT 84535

**Re: Fry Canyon Mill Tailings**

Dear Mr. James:

This letter is a follow up to our phone conversation the other day regarding the mill tailings at Fry Canyon. My husband Sandy, and our son, Preston, and I own the White Canyon Grazing Allotment which includes Fry Canyon. We have our home just down the creek from the mill tailings site. As I mentioned to you, we have drilled a well near the old well. This new well is vital to us. We haul from it nearly every day and have fixed up the old road on the west side of the mill tailings to access the well. In any project involving the mill tailings, we would request that our grazing and this well be included in those decisions.

As to the three proposed alternatives, we think things really should be left as they are since they have been that way for over 50 years and no one has been hurt because of the site. The second alternative is probably not a viable option. The concern we have with the third alternative of moving the tailings ponds to the pit and then covering it all with top soil is where you will get the top soil. Top soil is a scarce and valuable resource in that area. We would be opposed to moving top soil in the area to the site because that would not only scar the land and cause erosion at the place where the top soil is removed, we would lose the brush and grass that grow in that soil. And, it seems that it would take acres of top soil to get enough to cover the mill site and have it deep enough to seed and grow vegetation to hold the soil.

We would appreciate being informed of any decisions you make and ask that you consider our concern for the existing top soil and existing vegetation. Thank you.

Sincerely,

Gail Johnson





## SAN JUAN COUNTY COMMISSION

|                 |               |
|-----------------|---------------|
| Willie Grayeyes | Chairman      |
| Kenneth Maryboy | Vice-Chair    |
| Bruce Adams     | Commissioner  |
| Mack McDonald   | Administrator |

July 6, 2021

Mr. Robert James, Geologist  
Monticello Field Office  
Bureau of Land Management  
P.O. Box 7  
Monticello, Utah 84535

Re: Fry Canyon Tailings Site Engineering Evaluation Cost Analysis

Dear Mr. James:

We generally support the concept of stabilizing the waste contaminants at the old Fry Canyon Tailings site assuming that the risk of these contaminants potentially adversely affecting human health and environmental conditions warrants the proposed remedy.

If the Preferred Alternative (Alternative 3) is selected for further analysis we ask that special consideration be given to minimize the residual effects of topsoil removal at the selected borrow site. The borrow site should retain its capability to support vegetation vital to minimize potential erosion. We also ask that due consideration be given in any planning for the area to the Johnsons and their local livestock grazing operation, water supplies and area residence.

We appreciate this opportunity to comment.

Sincerely,

Willie Grayeyes  
Chairman