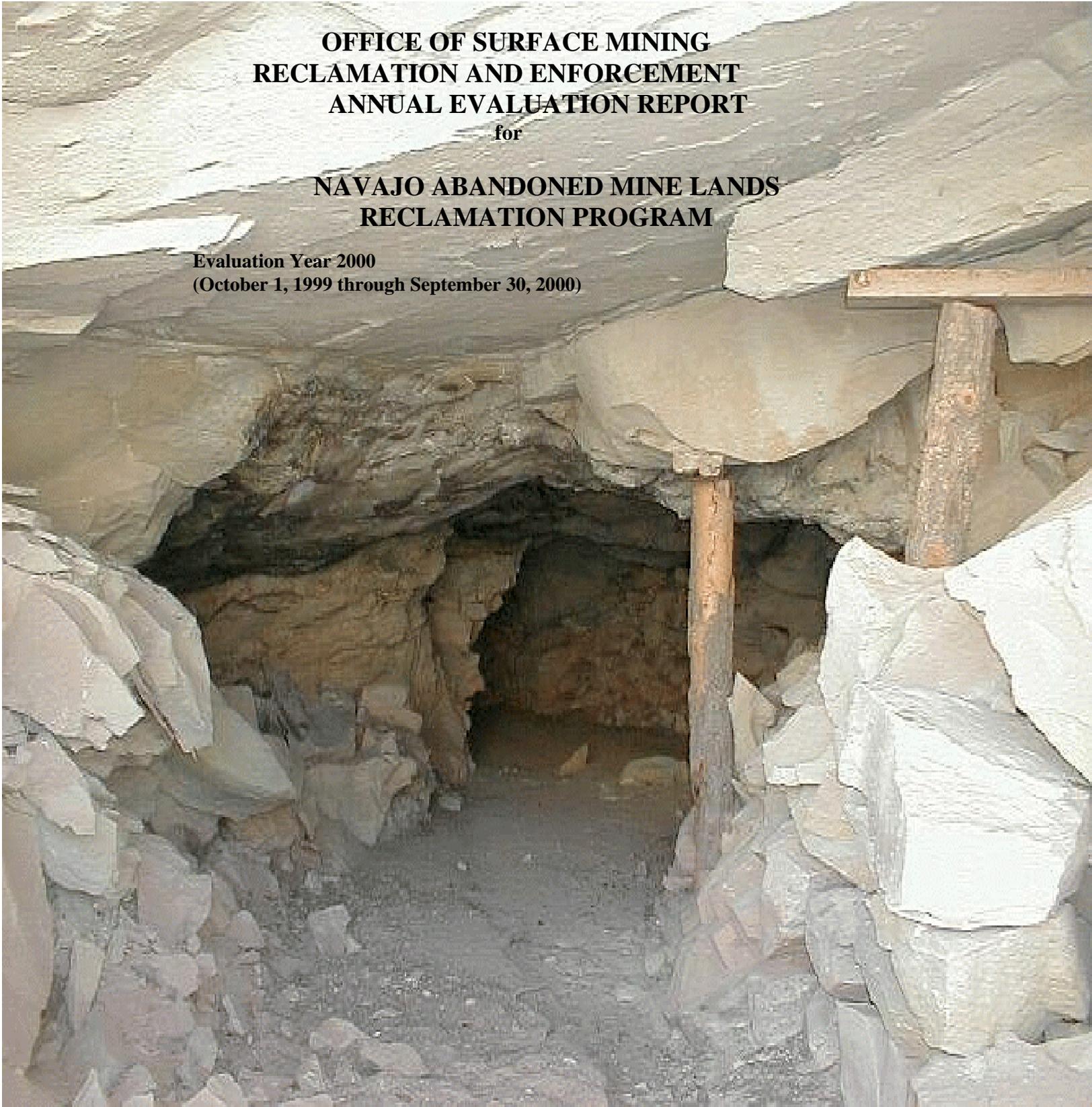


**OFFICE OF SURFACE MINING
RECLAMATION AND ENFORCEMENT
ANNUAL EVALUATION REPORT
for**

**NAVAJO ABANDONED MINE LANDS
RECLAMATION PROGRAM**

**Evaluation Year 2000
(October 1, 1999 through September 30, 2000)**



INTRODUCTION

The primary goal of the national Abandoned Mine Land (AML) Program is to mitigate the effects of past mining by reclaiming abandoned mines, with a primary emphasis on correcting the most serious problems endangering public health, safety, general welfare, and property. The Office of Surface Mining Reclamation and Enforcement (OSM) as well as State and Tribal AML Programs work together to achieve the goal of the National Program. On behalf of the Secretary of Interior, OSM administers the Abandoned Mine Reclamation Fund. OSM awards grants from the AML Fund to States and Tribes to pay for their administrative and reclamation costs. In addition, OSM works cooperatively with the States and Tribes to monitor the progress and quality of their Programs.

On May 16, 1988, the Secretary of the Interior approved the Navajo Nation's AML Reclamation Plan under Title IV of the Surface Mining Control and Reclamation Act of 1977 (SMCRA). This approval provides the authority for the Navajo Nation to reclaim abandoned mines on the Navajo Reservation in non-emergency AML projects. The Navajo AML Reclamation Program (Navajo AML Program) is situated within the Navajo Division of Natural Resources. The OSM Western Regional Coordinating Center's (WRCC) Albuquerque Field Office (AFO) provides assistance to the Navajo AML Program to accomplish abandoned mine lands reclamation on the Navajo Reservation.

On May 4, 1994, the Secretary of Interior concurred with the Navajo AML Program's "certification of completion" that all known priority-1 and priority-2 abandoned "coal" mines had been reclaimed. This approval authorized the Navajo AML Program to begin reclamation of abandoned "non-coal" mines.

The Navajo AML Program consists of a staff of 32 full-time equivalent positions (FTE's), five of these positions share time with the Navajo Nation's Uranium Mill Tailings Remedial Action (UMTRA) Program. The actual number of AML funded FTE's is 29.8 FTE's.

THE AML PROGRAM REVIEW

In conducting this annual review AFO followed OSM Directive AML-22 which contains general procedures for evaluating Abandoned Mined Land Reclamation Programs. This requires OSM and Tribal Programs to annually develop a Workplan for Program evaluation that contains evaluation topics, called "principles of excellence". In order to assess the success of the Program, specific "performance measures" must be identified in the workplan for each principle of excellence. The objective is not only to assess the annual performance and accomplishments of AML Reclamation Programs but also to identify actions that could be taken to improve performance, if possible.

To complete these principles of excellence reviews AFO established a review Team that includes representatives from Navajo AML Program, and OSM-AFO. Team representatives for 2000 evaluation period are: Madeline Roanhorse, Director, Navajo AML Program; Ray Russell, Assistant Director, Navajo AML Program; Ray Tsingine, Office Manager, Tuba City AML Program; Rose Grey, Office Manager, Shiprock AML Program; Willis Gainer, Director, OSM-AFO; Vernon Maldonado, AML Program Specialist, OSM-AFO; and, Dan Martinez, Grants Specialist, OSM-AFO. Quarterly meetings, office visits and field inspections were performed by individuals on the Team. Team representatives contribute to preparation and finalization of the workplan and the annual report.

THE WORKPLAN for EY-2000

The Team reviewed the draft workplan which was prepared by AFO and subsequently provided recommendations which were used to produce the final workplan. By jointly contributing to the development of the final workplan, the Team reached agreement on the selection of four principles of excellence as well as the associated performance measures. The final workplan thus defined the scope of oversight for the 12 month evaluation period for EY-2000.

Although workplans are developed annually, some principles of excellence may be evaluated for more than one year in order to make a meaningful assessment of the subject. Alternatively, different aspects of a principle may be reviewed from year to year. Workplans describe why specific topics are selected for evaluation, the review population and sample size, how the team conducts the review, and the schedule for the review. As a general rule, the Team emphasized on-the-ground results in its reviews in order to focus on results rather than just paperwork.

The four principles of excellence that were selected for the EY-2000 Workplan are:

Principle of Excellence 1: The Navajo AML Program will strive to improve its “obligation rate” to be consistent with other AML Programs nationwide.

1. Performance Measure: *Is the Navajo AML Program striving to use available AML grant funds by properly planning, scheduling, and completing reclamation projects?*
2. Performance Measure: *OSM-AFO established a goal for the Navajo AML Program to achieve an obligation rate of 75% by the end of EY-2000. Was this goal achieved?*

Principle of Excellence 2: The Navajo AML Program must have systems in place to ensure accountability and responsibility for spending and properly managing AML funds, including a process to assure that such systems are working.

1. Performance Measure: *Is the Navajo AML Program in compliance with OSM’s Federal Assistance Manual?*

2. Performance Measure: *Do Tribal AML program managers have adequate financial information to manage the projects and the program?*

Principle of Excellence 3: Information on AML Program operations and accomplishments should be gathered and maintained in an effective manner.

1. Performance Measure: *Is the Navajo AML Program maintaining the Abandoned Mine Land Information System (AMLIS) database in compliance with OSM Directive AML-1?*
2. Performance Measure: *Does the Navajo AML Program project designs and contract specifications routinely address those projects funded by the annual construction grant(s) and associated priority hazards inventoried in the AMLIS database?*

Principle of Excellence 4: Review of Navajo AML Program projects should demonstrate successful implementation of the program.*

1. Performance Measure: *Do field inspections of completed projects and projects under construction demonstrate that reclamation objectives have been met?*

(* Note: This principle was not included in the original workplan.)

SUMMARY OF REVIEW FOR EY-2000

These summaries are based on information gathered by the Team during the evaluation period including field visits to AML projects, meetings, and review of project files, grant files, and AMLIS reports. OSM-AFO's annual evaluation reports routinely include a discussion of the quality of reclamation work observed during oversight field inspections. The Summary of NAMLRP reclamation accomplishments immediately follows this Summary of Review section.

Principle of Excellence 1: The Navajo AML Program will strive to improve its "obligation rate" to be consistent with other AML Programs nationwide.

AML Programs nation wide have urged the OSM Director to request that Congress increase its annual level of appropriations from the AML Fund. Most AML Programs nationwide annually deplete their State Share AML Fund Balance in an effort to demonstrate to Congress that an increased level of annual appropriations could be effectively utilized to rapidly accomplish reclamation priorities under SMCRA.

This principle was developed in order to encourage the Navajo AML Program to bring its obligation rate in line with other AML Programs nationwide. Navajo AML has agreed to work to reduce its State Share balance. Although there is no regulatory requirement for AML programs to submit grant applications for state share balances by a specified time, there is a requirement that construction grant funds be depleted within three years.

The Team reviewed the trend in the Navajo AML Program's ability to obligate AML funds. Based upon the trend in obligation rate, OSM will be more apt to project when the existing unobligated balance will be consumed. The population sample consisted of all grant information regarding obligations for all active grants for the past three evaluation years (1998 through 2000), and funds available in the state share balance for the Navajo AML Program. In conducting this evaluation, AFO and the Navajo AML Program reviewed grant information, projects, AMLIS data and close out reports. Obligation of state share balance funds was discussed during quarterly meetings with regard to barriers that may exist and changes that may need to be implemented in order to improve the obligation rate.

The Navajo AML Program submits simplified grant applications to OSM annually for funding of their program. OSM reviews the grant applications and awards grant funds to the Navajo AML Program accordingly. OSM Grants are divided into two general accounts, a "Construction" account for project construction work (project development work to get projects designs and contract specifications put together, work performed to meet National Environmental Policy Act (NEPA) requirements, and actual construction contracts) and an "Administration" account for administration of the AML program (wages, salary, benefits, overhead, office space, vehicles, furniture and equipment).

Performance Measure-1: Is the Navajo AML Program striving to use available AML Grant funds by properly planning, scheduling, and completing reclamation projects?

Performance Measure-2: OSM-AFO established a goal for the Navajo AML Program to achieve an obligation rate of 75% by the end of the Evaluation year. Was this goal achieved?

Findings:

At the beginning of the evaluation period, the Navajo AML Program had a state share balance of about \$11 million. In addition, the Navajo AML Program had approximately \$10 million of unobligated grant funds available from previously awarded grants. All together the Navajo AML Program had a total of \$21 million available at the beginning of FY-2000.

AFO met with the Navajo AML Program to review grant files and project files in order to determine the expenditures that occurred during EY-2000 and the remaining balance in each grant account. OSM was primarily concerned with the obligation of project construction funds not the obligation of administration costs.

The Team determined that the Navajo AML Program has significantly increased its rate of obligations from past years. The obligation rate at the beginning of the evaluation year was about 58%. By the end of the EY-2000 the rate had improved by more than 15% to an overall obligation rate of about 74%. The Navajo AML Program is to be commended for this improvement! The reasons for this success are varied. The program now utilizes outside contractors for construction work which has expedited project completions. More reclamation

has been accomplished as a result. The Navajo AML Program has also streamlined various aspects of its contracting process in order to increase the pace at which reclamation work is completed. Scheduling and planning of environmental assessments and engineering, contracting, and construction is not a simple task, given the occasional presence of threatened and endangered species and the extreme climatic aspects of hot summers and cold winters that exist on the Reservation.

The Team also expects the Program's transition into public facilities projects in EY-2001 and EY-2002 to result in a more rapid overall depletion of the Navajo Nation's State Share AML Fund. Also, the Navajo AML Program has submitted to OSM an informal amendment to its AML Plan in order to incorporate Public Facilities.

The Navajo AML Program is working to decrease its grants and State Share balance by obligating funds at a rate that exceeds its annual appropriation rate by almost two-fold. Accomplishing this requires effective planning and scheduling of project workload and coordination of field work. At the current rate it is projected to take approximately three years for the Navajo AML Program to exhaust its carry over balance. However, OSM anticipates this may occur sooner because the public facilities program will likely increase the Navajo AML Program's rate of spending. It may take two or three years for the state share balance to be reduced to the 90% goal set by OSM

Principle of Excellence 2: The Navajo AML Program must have systems in place to ensure accountability and responsibility for spending and properly managing AML funds, including a process to assure that such systems are working.

AFO reviewed financial progress and close out reports submitted by the Navajo AML Program during EY-2000. These records were reviewed for compliance with OSM's Federal Assistance Manual. This topic was selected for review in EY-1999 and again for EY-2000. The population sample consists of all financial performance & close out reports submitted during the current evaluation period. AFO conducted this review continually throughout the evaluation year at the Navajo AML Program Offices. AFO expects the review to show if the Navajo AML Program is in compliance with the OSM Federal Assistance Manual.

Performance Measure 1: Is the Navajo AML Program in compliance with OSM's Federal Assistance Manual?

Findings:

In EY-1999, OSM compared the Navajo AML Program's contracting procedures under the Navajo Business Preference Law to the requirements of 43 CFR 12.76 and as a result of issues raised during the review, this topic was carried forward in EY-2000. In evaluating this topic during EY-2000, OSM gathered contract information for all contracts issued by the Navajo AML Program during the Evaluation Year. OSM found that the Navajo AML Program no longer used contract bids under the Navajo Business Preference Law and instead the Program began using Requests for Proposals (RFPs). This procurement process requires all bids to be opened and competitive. All contracts awarded by the Navajo AML Program were RFPs, all bids were

opened, and awards went to the lowest responsible bidder pursuant to the Navajo Business Preference Law. Therefore, OSM no longer has a concern with the Navajo Nation's procurement process. OSM appreciates the action taken by the Navajo AML Program to switch from bids to RFP's and the fact that all bids are opened and awarded to the lowest responsible bidder. Consequently, the Navajo AML Program has been determined to be in compliance with the requirements of 43 CFR 12.76. OSM concludes that the bidding process is no longer an issue. All bids are opened and awarded pursuant to the Navajo Nation's procurement laws.

Performance Measure 2: Do Tribal AML program managers have adequate financial information to manage the projects and the program?

Findings :

This performance and enhancement review was conducted continually during the EY-1999 and also continued through EY-2000 (October 1, 1999 to September 30, 2000). The documents reviewed were financial progress and narrative reports for three AML grants: GR697810, GR707810 and GR807810.

Programs should have systems in place to ensure accountability and responsibility for spending AML funds and a process to ensure that such systems are working, specifically financial progress and closeout reports submitted by the Navajo AML Program during Evaluation Year 2000. The OSM Federal Assistance Manual (FAM) at chapter 5-60A requires financial progress reports, Form OSM-49, be submitted 90 days after the end of the reporting period. The OSM-49 forms submitted by the Navajo Nation for the three grants reviewed were submitted within the 90 day reporting period, and the Navajo Nation is in compliance with the FAM. Additionally, the FAM requires that the reports be reviewed for mathematical accuracy. OSM routinely reviewed the OSM-49 forms for accuracy upon receipt in the Field Office, and prior to submitting the form to the OSM Denver Division of Financial Management.

Reviews indicated that no mathematical errors were found for the three grants reviewed. These documents are maintained in the official grant files located in the Albuquerque Field Office. OSM's review confirmed that the Navajo AML Program is in compliance with the Federal Assistance Manual Chapter 5-60-A. The review also confirmed that Navajo AML Program submitted cost reports on time and completed drawdown actions regularly.

Based on this review OSM determined that the Navajo AML Program managers had adequate financial information available to effectively run their program.

Principle of Excellence 3: Information on AML Program operations and accomplishments should be gathered and maintained in an effective manner on Abandoned Mine Land Information System (AMLIS).

This principle is reviewed annually by OSM. The AMLIS is a centralized, combined database that serves to maintain an AML inventory on a national level. It serves as a planning and reporting tool by enabling access and data manipulation by individual AML programs and some OSM offices. The Team expects this review to show how well the Navajo AML Program uses

the elements tracked by AMLIS to formulate the goals for each project for which funding is requested and how well the Navajo AML Program meets the AML reclamation goals stated in the annual grant application.

Improving the timeliness and accuracy of AMLIS updates is a priority for OSM. OSM-AFO committed to resolving this situation as one of its goals under the Government Performance and Results Act (GPRA) initiative.

Performance Measure 1: Is the Navajo AML Program maintaining the AMLIS database in compliance with OSM Directive AML-1 ?

Performance Measure 2: Does the Navajo AML Program's project designs and contract specifications routinely address those projects funded by the annual construction grant(s) and associated hazards inventoried in the AMLIS database?

OSM conducted its enhancement and performance review throughout the year. The Navajo AML Program's use of AMLIS and information systems was also discussed at quarterly meetings. OSM evaluated how well the Navajo AML Program complied with OSM Directive AML-1 for maintenance of the AMLIS database. The review was based on information exchanged between the Navajo AML Program and OSM continually throughout the year and on quarterly AMLIS reports. OSM notified Navajo AML Program managers of the importance of this issue. The OSM also provided training and assistance to the Navajo AML Program in computer support and Internet access.

The Team reviewed the Navajo AML Program's use of AMLIS during this review period because in the last few years the Navajo AML Program has experienced difficulties in keeping AMLIS updated due to network access problems. OSM has funded computer equipment and upgrades, Internet access, and technical support so the Navajo AML Program would have the necessary technology and equipment available to update and maintain AMLIS in a timely manner.

During EY-2000, the Team evaluated how well the Navajo AML Program:

1. Utilized the elements tracked by AMLIS to formulate the goals for each proposed project submitted for funding in the annual grant application; and
2. Updated reclamation accomplishments as they occurred.

The population sample was all the problem area descriptions (PAD's) that pertain to active projects and the projects that the Navajo AML Program identified for funding in the annual grant application (i.e., all active projects). The sample size was all PAD's created, modified, funded or deleted in AMLIS during the evaluation period. OSM acknowledges the difficulty that the Navajo AML Program has had in the past maintaining AMLIS without having Internet access at the Tuba City and Shiprock Offices.

OSM also reviewed AMLIS quarterly reports which show the Navajo AML Program's creation of new PAD's, modification of existing PAD's, and deletion of PAD's that no longer constitute

hazards. OSM's main concern was that all data be accurately entered and updated by September 31, 2000.

Findings:

The Navajo AML Program's use of AMLIS throughout the evaluation year in relation to its discovery of new hazards, receipt of funding, and completion of reclamation projects was difficult to assess because of problems in getting AMLIS to work early in the evaluation period. This was not necessarily the fault of the Navajo AML Program. The program was reinstalled on various computers and due to staff turnover passwords also had to be reassigned by OSM-HQ to new users. Staff turnover is also responsible for questions with regard to what had been already entered into the system and what remained to be entered. This was sorted out by the Navajo AML Program during the first three quarters and the system was finally updated just before the final deadline of September 30, 2000.

OSM recommends that the Navajo AML Program institute policies and procedures to ensure that staff turnover does not affect the program's ability to track accomplishments in AMLIS in a timely manner. OSM anticipates that the maintenance of AMLIS data accomplishments during EY-2001 will be much smoother and systematic each quarter.

The Navajo AML Program's success is based on:

1. creation of new PAD's for previously undiscovered AML sites;
2. modification of existing PAD's to reflect newly discovered additional features/hazards;
3. modification of existing PAD's to reflect updated reclamation estimates;
4. modification of existing PAD's to reflect funding levels (upon submission of National Environmental Policy Act (NEPA) compliance documentation but prior to receiving authorization to proceed);
5. modification of existing PAD's to reflect final accomplishments and final costs of reclamation; and
6. deletion of PAD's from AMLIS upon determination that they no longer constitute a hazard.

Principle of Excellence 4: Review of the Navajo AML Program's projects should demonstrate successful implementation of their program.

Performance Measure 1: Do field inspections of completed projects and projects under construction demonstrate the reclamation objectives have been met?

Findings:

OSM participated in inspections of active reclamation work at the Cameron-5 Project during EY-2000. This was a very large project with numerous sites scattered about square 80 miles on the western part of the Reservation. The Project covered an area from Cameron, Arizona north to the Utah border and involved both uranium and coal sites. Historically, during the construction of previous AML reclamation projects in the Cameron area, plant and animal fossils have been found to occur inside the mine waste materials. These valuable paleontological resources require protection in compliance with Federal Land Policy and Management Act which prevents willful disturbance, removal, destruction of scientific resources or natural objects, provides protection of fossils from operations authorized under mining laws, and other laws specific to certain federal agencies. The Navajo Nation through Navajo AML Program signed a Professional Services Contract with the Museum of Northern Arizona to recover and protect valuable scientific materials belonging to the Navajo Nation. The Museum of Northern Arizona performed Paleontological Salvaging and Monitoring at one (1) AML site under the Cameron 5 AML Reclamation Project. The Navajo AML Program staff health physicist actively monitored radiological levels during the operations. Watering of the operations for dust suppression of waste material was actively conducted during the construction of the project. Dust suppression procedures were stringently followed to prevent worker exposure and contamination. Access to the site was restricted at the entrance check point. The operation also accurately followed the project design details and specifications. Navajo AML Program staff engineers actively supervised reclamation operations and contractor performance.

Inspection of this project provided OSM with a good overview since part of the project was completed, part was actively being reclaimed and part was yet unreclaimed at the time of the inspection. The Navajo AML Program staff who conducted the tour were very knowledgeable of the project specifications as well as the location of each site. Reclamation proceeded on schedule and appeared to be successful and well designed to enhance long-term stability of the reclamation work.

Two portals were reclaimed near a busy highway near the Utah-Arizona border. The reclamation work was so successful that the site was not easily identifiable as a reclamation site. Another area was inspected at which several openings in extremely rocky and steep terrain were reclaimed. The openings were covered with natural rock to blend into the topography and to hide the portals from view. This part of the project work had to be done by hand in difficult working conditions but it was obvious that no short cuts were taken with regard to the reclamation work.

Tables 1 and 2 identify program accomplishments in terms of hazard remediation during EY-2000 and year to date accomplishments of the program respectively. The Navajo AML Program is commended for its outstanding reclamation efforts observed during this evaluation period. This principle has consistently been found to be outstanding during past evaluations and OSM also commends the Navajo AML Program for the recent awards it has received for its reclamation work.

NAVAJO AML PROGRAM RECLAMATION ACCOMPLISHMENTS

Table-1 shows the total reclamation accomplishments of the Navajo AML Program during EY-2000. Table-2 shows the total cumulative reclamation accomplishments for the Program date (YTD). The number of unreclaimed mine-related hazards that exist within the Reservation is not included in these tables. Data in the tables comes from OSM's AMLIS. AMLIS was designed to be a national inventory (database) for abandoned "coal" mine hazards within each State. The database includes information about the location, number of hazards, priority of each hazard, any reclamation accomplishments and costs associated with reclamation of hazards in the inventory (both reclaimed and unreclaimed). The only "non-coal" information included in AMLIS is any expended or obligated costs associated with reclamation of such sites. AMLIS is not intended to function as a comprehensive inventory of un-reclaimed "non-coal" abandoned mine hazards within a State. However, the Navajo AML Program projected completing all of its inventory of noncoal uranium hazards by the end of EY-2002 and is also concurrently amending its AML Plan to incorporate Public Facilities Projects into the scope of the AML Program.

Table 1
Navajo AML Reclamation Program
EY-2000 Accomplishments *

Problem Type and Description	Completed	
	Units	Costs
BE-Bench	22.0 acres	\$ 69,768.00
DH-Dangerous Highwalls	16,866 feet	\$ 1,086,877.00
DPE-Dangerous Piles & Embankments Embankments	99.8 acres	\$ 2,316,345.00
EF-Equipment/Facilities	(count)	\$ 0.00
GO-Gobs	39.2 acres	\$ 143,200.00
H-Highwall	280 feet	\$ 24,375.00
HEF-Hazardous Equipment & Facilities	(count)	\$ 0.00
HR-Haul Road	22.9 acres	\$ 150,813.00
IRW-Industrial/Residential Waste	1.0 acres	\$ 1,139.00
MO-Mine Opening	0 (count)	\$ 0.00
O-Other	246	\$ 770,970.00
P-Portals	158 (count)	\$ 349,839.00
PI-Pits	27.5 acres	\$ 105,917.00
PWAI-Polluted Water: Agric. & Indust.	0 (count)	\$ 0.00
S-Subsidence	2.9 acres	\$ 0.00
SA-Spoil Area	.0 acres	\$ 0.00
SB-Surface Burning	.0 acres	\$ 0.00
SP-Slump	.0 acres	\$ 0.00
UMF-Underground Mine Fire	.0 acres	\$ 0.00
VO-Vertical Opening	87 (count)	\$ 57,938.00
WA-Water Problems	0 (count)	\$ 0.00
NAVAJO TOTAL COSTS		\$ 5,077,181.00

* This table is based on a Problem Type Unit and Cost Detail Report from the Abandoned Mine Land Inventory System as of 09/31/00. Because all "coal" reclamation is completed, this table does not show an inventory of the number of un-reclaimed. "Non-coal" hazards are not tracked by the AMLIS inventory, unless they are actually funded with or reclaimed by AML funds.

Table 2
Navajo Abandoned Mine Reclamation Program
AML Reclamation Accomplishments YTD

	Completed	
Problem Type and Description	Units	Costs
BE-Bench	24.4 acres	\$ 84,396.00
DH-Dangerous Highwalls	42,822 feet	\$ 3,857,274.00
DPE-Dangerous Piles & Embankments Embankments	171.4 acres	\$ 3,587,252.00
EF-Equipment/Facilities	2 (count)	\$ 12,405.00
GO-Gobs	150.8 acres	\$ 691,992.00
H-Highwall	280 feet	\$ 24,375.00
HEF-Hazardous Equipment & Facilities	4 (count)	\$ 26,925.00
HR-Haul Road	46.3 acres	\$ 193,096.00
IRW-Industrial/Residential Waste	2.0 acres	\$ 12,405.00
MO-Mine Opening	46 (count)	\$ 118,583.00
O-Other	308	\$ 875,815.00
P-Portals	481 (count)	\$ 1,798,384.00
PI-Pits	47.5 acres	\$ 337,610.00
PWAI-Polluted Water: Agric. & Indust.	4.0 (count)	\$ 70,350.00
S-Subsidence	8.4 acres	\$ 257,884.00
SA-Spoil Area	264.5 acres	\$ 423,854.00
SB-Surface Burning	3.0 acres	\$ 10,000.00
SP-Slump	.0 acres	\$ 0.00
UMF-Underground Mine Fire	.0 acres	\$ 0.00
VO-Vertical Opening	158 (count)	\$ 208,026.00
WA-Water Problems	0 (count)	\$ 0.00
NAVAJO TOTAL COSTS		\$ 12,590,626.00

**Black Jack Mine
Reclamation Project:**

**This is a cooperative
project with New
Mexico AML
Program.
New Mexico is doing
the reclamation work,
and Navajo AML is
providing technical
assistance with getting
owner concurrences,
etc.**



Cameron 5 Project:

**This photograph
shows final grading
and topography.**

**Radioactive materials
are covered with non-
radioactive topsoil
material and blended
in with surrounding
topography.**



Cameron 5 Project:

This is another area of the Project. The photograph shows final grading and topography with positive drainage and rough scarification to encourage seed deposition and germination.



Cameron 5 Project:

The small rocks above the dark outcrop are strategically placed by hand over a safeguarded portal. This mason work was done to mask the site from public view and thereby discourage access. This site is on a steep slope area.





Cameron 5 Project: These photographs show rough scarification and placement of large boulders as a safety precaution to prevent visitors from accidentally driving off of a cliff. The site is part of a local scenic overlook in the Cameron area.



Cameron 5 Project: Radioactive waste material is being relocated.

Due to the high level readings of this material, it must be watered down to prevent airborne dust contamination on and off site. NAML's contract specifications require contractor equipment to be fully and tightly enclosed. (Note that both the driver and helper are wearing face masks as a further measure to prevent ingestion of air born contaminants.)

