

40-8502



The State
of Wyoming

Department of Environmental Quality

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May 16, 2002

Mrs. Donna Wichers
COGEMA Mining, Inc.
P. O. Box 730
Mills, WY 82644

RE: NonSignificant Revision Application, TFN 3 3/389, Permit No. 478

Dear Mrs. Wichers:

In our meeting in Sheridan on May 10, 2002, you indicated there were two comments in my August 14, 2001, review memo which had caused you some concern. As you recall, these were derived from Steve Ingle's review comments on a very similar bioremediation plan submitted by PRI. I have discussed these comments with Steve Ingle and can offer some additional insight into them.

The first comment was 2(k) which discussed the possible reclassification of the UIC Class III injection wells as UIC Class V wells once their use went from injection to remediation. Apparently, a couple of companies have sought to reclassify their Class III wells as Class V prior to remediation operations because Mechanical Integrity Testing is not required for Class V wells.

Reclassification of wells is not recommended by the Land Quality Division. A recommended response to this comment would be that COGEMA understands this option is available, but you choose not to take it.

The second comment was the next to last paragraph of the August 14 letter which made references to the use of ThioRed and hydrogen sulfide reductants as being experimental in nature and that no record of their approval by the NRC or DEQ could be found. This may be true for those companies to which Steve was referencing, but was and is not true of COGEMA.

COGEMA's approved restoration plan, Section 6.1.2.2, Reverse Osmosis/Permeate Injection Phase, Page 6-8, paragraph 2, states that hydrogen sulfide will be added to the permeate. It also stated that the use of polythiocarbonate (ThioRed) was approved, but only for pilot use in the Irigaray wellfields.

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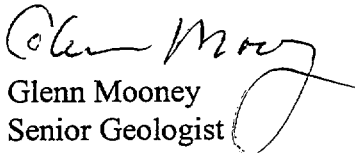
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COGEMA Mining, Inc.
Permit No. 478, TFN 3 3/389
May 16, 2002
Page 2

I apologize for the last comment. I should have done a better job of editing. However, my research in the approvals for reductants did find that the use of hydrogen sulfide at this stage of restoration appears to be mandatory. You may wish to revise the pending NonSignificant Revision (NSR) application by revising this section to give COGEMA more flexibility during restoration.

Please feel free to call if you have any questions

Sincerely,


Glenn Mooney
Senior Geologist

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cc: R. Chancellor
NRC - MD

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