



State of Utah

Department of
Environmental Quality

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Executive Director

DIVISION OF RADIATION
CONTROL
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December 6, 2005

CERTIFIED MAIL
RETURNED RECEIPT REQUESTED

Mr. Harold R. Roberts
Vice President – Corporate Development
International Uranium Corporation
Independence Plaza, Suite 950
1050 Seventeenth Street
Denver, CO 80265

SUBJECT: July 26, 2005 Operations and Maintenance Plan (Plan), for the Chloroform Investigation Wells at the White Mesa Uranium Mill Near Blanding, Utah, Discharge Permit No. UGW370004 – **Second Request for Modifications to the Plan**

Dear Mr. Roberts:

We have reviewed the July 26, 2005 Plan for the pumping system for the chloroform investigation wells at the White Mesa Uranium Mill near Blanding, Utah. We have determined that some modifications need to be made to the Plan:

1. **Page 1, WINTERIZATION FOR LONG-TERM OPERATION:** Please identify the time period that will define "winter months". In addition, pumping well TW4-20 should also be winterized. Please add this well to the Plan.
2. **Page 1, WINTERIZATION FOR LONG-TERM OPERATION, Item 2):** Please specify the minimum depth at which the 2-inch polypropylene drain line will be covered with soil in the trench to prevent water in the line from freezing.
3. **Page 1, WINTERIZATION FOR LONG-TERM OPERATION, Item 3):** Please provide an inspection form for each shift observation round. This documentation must include, but is not limited to:
 - Well ID
 - Date and time
 - Name of shift foremen
 - Condition of protective insulated boxes over wellheads
 - Electrical system operational status
 - Heat lamp operational status
 - Flow meter readings (flow rate and total volume)
 - Flow meter operational status
 - Pump operational status
 - Malfunctions and abnormal operations of the pumping system
 - Problems and potential problems observed

4. **Page 2, OPERATIONS:** Please include Item 3 above in the operations plan. In addition, IUC failed to respond to Item 12 in the DRC letter dated April 27, 2004 which are:

- 1) Sampling related to planned recovery tests: Collection of VOC samples and analysis from each of the pumping wells and all of the observation wells immediately prior to cessation of pumping. Repeat VOC sampling and analysis of all of the pumping and observation wells is also needed at the end of the recovery period.
- 2) Generate monthly water table contour maps and other evidence to demonstrate that the recent pumping of MW-4, TW4-16, TW4-19, TW4-20 and/or other wells has been sufficient to hydraulically contain and control all the VOC contamination in the shallow aquifer. These maps need to show groundwater stream tubes and the horizontal propagation of each cone(s) of depression in the water table to or beyond the location of the sources of chloroform contamination.

Please include 1) and 2) above in the operations plan.

5. **Page 2, MAINTANENCE:** Please provide minimum maintenance procedures for mechanical (e.g. flow meter) and electrical (e.g. electrical power to well head, electrical sensors, heat lamps etc.) features.

6. **Page 2, MONITORING AND REPORTING:** In the quarterly monitoring report for the chloroform pumping system please include:

- monthly water table contour maps,
- results of VOC analysis from pumping and observation wells (includes copies of chain of custody forms and laboratory analytical reports),
- copies inspection forms,
- conclusions and recommendations.

Please submit a new Plan within 30 days of the receipt of this letter for Executive Secretary approval. Thank you for your cooperation in this matter. Please contact me at 801-536-0046 with any questions.

Sincerely,



Dean C. Henderson, P.G.
Utah Division of Radiation Control

DCH;dh

cc: Rob Herbert, DWQ
Bill VonTill, NRC - Washington, D.C.