AK

Department of Environmental Quality

To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.

Dave Freudenthal, Governor

John Corra, Director

7/7/08

Rebecca D. Lindeman
ARCDIS
1687 Cole Center
Suite 200
Lakewood

RE: TFN 5 5/021, Final Boner Property Well Summary

Dear Rebecca,

The Land Quality Division (LQD) received the "Final Boner Property Well Summary" on June 9th, 2008. The temporary file number (TFN) was assigned (TFN 5 5/021) and the report was reviewed by Steve Ingle (**SI**) and Anna Krzyszowska-Waitkus (**AKW**). More detailed comments are attached to this letter.

Should you have any questions, please contact Anna Waitkus in the Cheyenne Office at (307) 777-6284

Sincerely,

Anna Waitkus

Senior Environmental Analyst

Land Quality Division

Cc: Tom McLaughlin

11455 Rockville Pike, Rockville,

Maryland, 20852, Mail Stop T-8F5.

RE: Final Boner Property Wells Summary, TFN 5 5/021, First Round Comments

The review was prepared by Anna Krzyszowska-Waitkus (**AKW**) and Steve Ingle (**SI**)

According to the statement in the report, the Point-of-Compliance well is well No. 125. According to the report's statement, the BBL wells are downgradient from well No.125. The higher Se concentration was detected in well No. BBL-2 and reached the value of 0.05 mg/l. The higher concentration of U then in well No. 125 (0.089 mg/l) was detected in well No. MFG-1.

1. Section 4 of the report compares the BBL wells with Monitoring Well 125. These wells are in different stratigraphic units that are not connected and cannot be compared. Please correct the text. **(SI)**

2. No ACL's have been established for the BBL wells, therefore comparing the uranium values in these wells to the ACL for Well 125 is not valid. Please remove the comparison. **(SI)**

3. Wells BBL 2, 3, and 4 contain elevated chloride, in addition to the elevated uranium, which is an indication that the source of the plume is from dewatering of the tailings. It is recommended that additional alluvial wells be placed further downstream to assess the extent of the plume and determine baseline water quality for the alluvium. Please add additional wells to delineate the plume. **(SI)**

4. Figure 2. This is a minor issue, but the cross-section shows alluvium underlying the backfill at the high point on the cross-section. There does not appear to be a stream channel associated with this alluvium. Please describe the alluvium . **(SI)**

5. The Point- of -Compliance is well No. 125. Please clarify to which wells this can be used as background information. Please provide water quality data for this well as it was done for wells No. MFG-1, 2, 3 and BBL-1, 2, 3, 4. It was stated that the Alternate Concentration Limit (ACL) for U-nat is **0.089** mg/l for this well. Is it for the average sample? Please provide the range. Please describe how the ACL concentration was determined. (**AKW**)