

Shroff, Behram

From: Jon Winter (USA - Casper) [Jon.Winter@uranium1.com]
Sent: Tuesday, June 08, 2010 10:46 AM
To: Shroff, Behram
Cc: Mike Griffin (USA - Casper)
Subject: RE: CESQG Moore Ranch

Behram, I found out yesterday that the person I was told to contact on this issue was out of the office for an extended period (months), thus the reason he never called me back. I call the Waste & Haz waste administrator in Cheyenne (Carl Anderson) as he informed me just what you and I had discussed, and that is:

There is no permit, license, application or authorization required for a CESQG.
Like the EPA, they strongly suggest a CESQG maintain records on waste generated on a monthly basis.
If your (an operator) status has a generator changes (exceeds 100Kg or 2.2Kg acute/month) then the state must be notified of the operators change in generation status.

Sorry this took so long to get a simple answer.

Jon F. Winter
Manager Environmental & Regulatory Affairs, Wyoming

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From: Shroff, Behram [mailto:Behram.Shroff@nrc.gov]
Sent: Friday, May 28, 2010 1:54 PM
To: Jon Winter (USA - Casper)
Subject: RE: CESQG Moore Ranch

Jon: I already have all the info below. My question was: is there a permit, license, or application that is needed if you are a SQG? Thanks

From: Jon Winter (USA - Casper) [mailto:Jon.Winter@uranium1.com]
Sent: Friday, May 28, 2010 3:40 PM
To: Shroff, Behram
Cc: Mike Griffin (USA - Casper)
Subject: CESQG Moore Ranch

Behram, as per your phone call, as you know we have stated that we anticipate our hazardous waste status will be conditionally exempt small quantity generator (CESQG). There are no reporting requirements for CESQG, but the EPA highly recommends records be kept to verify continued CESQG status. Federal requirements also state that if a generator exceeds 100Kg (220 lbs) of hazardous waste or 2.2Kg acute hazardous waste per month and other storage requirements, the EPA must be notified of your changes of generator status. If you have any other questions, give me a call.

Jon F. Winter
Manager Environmental & Regulatory Affairs, Wyoming