



Department of Environmental Quality

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



Matthew H. Mead, Governor

Todd Parfitt, Director

March 28, 2014

Mr. Ken Garoutte
Cameco Resources
P.O. Box 1210
Glenrock, WY 82637

**RE: TFN 5 2/340, T2 Review of Mine Unit 1 Restoration Plan
TFN 5 1/315 Outstanding Review Mine Unit E Restoration Plan
TFN 5 6/241 Outstanding Review Mine Unit C Restoration Plan
TFN 5 5/238 Outstanding Review Mine Unit D-Dext Restoration Plan
Permit 633, Cameco Resources**

Dear Mr. Garoutte:

The Land Quality Division (LQD) has reviewed the responses to comments received on January 31, 2014. Three of the responses are not acceptable and will need further correction to the restoration plan. Please find the review enclosed.

The LQD has allowed Cameco to pursue restoration activities without approved Individual Restoration Plans (IRP) for mine units. This decision was made by LQD to prevent further delays in an extensive backlog of mine units requiring restoration. It was not anticipated that the restoration plans for the mine units which are now in various phases of restoration, would take an extended amount of time to review and approve. A letter was sent to Cameco on April 4, 2012 stating "LQD expects the restoration plans for mine units currently in restoration to be finalized by **July 30, 2012** as required by Wyoming Environmental Quality Act § 35-11-428(a)(iii)(H) and LQD Rules and Regulations Chapter, Section 5(a)(ii)". The IRPs remain unapproved at this time.

Although Cameco presented an update of restoration activities during a meeting in March 2013 and also provided Restoration Progress Reports, the outstanding concerns expressed in the review comments for the restoration plans have not been satisfied. Therefore, LQD requests that the four Individual Restoration Plans for ongoing restoration activities in Mine Units C, D, E and 1, be finalized with the information that has been requested so that they may be approved. Please provide responses to the following reviews **within 30 days of receipt of this letter**:

- TFN 5 1/315 – Mine Unit E Restoration Plan (Comments sent January 8, 2013)
- TFN 5 6/241 – Mine Unit C Restoration Plan (Comments sent January 3, 2013)
- TFN 5 5/238 – Mine Unit D/D-extension Restoration Plan (Comments sent February 14, 2014)
- TFN 5 2/340 – Mine Unit 1 Restoration Plan (enclosed review)

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INTRODUCTION

The LQD received responses to T1 review comments on January 31, 2014. These responses were superseded by responses received on November 11, 2013. Cameco and LQD discussed the process of entering stability monitoring during a meeting held in Cheyenne on February 20, 2014. The permit language indicates the operator will request concurrence to enter stability. Cameco will provide the restoration report including a Guideline 8 water quality sample taken at the end of restoration with a request to enter stability monitoring.

LQD will require that the Individual Restoration Plan (IRP) for Mine Unit 1 be approved (TFN 5 2/340) prior to entering stability monitoring. The comments below indicate that three responses remain *Not Acceptable*. In addition, the LQD will require verification of the restoration for the O-Sand Pilot Project prior to entering stability. LQD is conducting a records review of the files. If the information is not found, the verification will be requested from Cameco during the review of the restoration report prior to providing concurrence to enter stability monitoring.

COMMENTS

- 1 Response Acceptable. The detection limit (MDL) is used for treating non-detects in the baseline restoration target value determination. **(SI)**
- 2 Response Acceptable. Figure 1 does not have a legend, but there is an unlabeled pink line that appears to be the pipelines. **(SI)**
- 3 Response Acceptable. Appendix B has been included. **(SI)**
- 4 **Response Not Acceptable.** The text has not been updated to correct the discrepancy as requested. The statement in Section 5.2.2 should state that sodium sulfide is being used (as stated in Section 3.0) and may be used as needed during other phases of restoration. **(SI)**
- 5 **Response Not Acceptable.** If each mine unit restoration plan contains a schedule and the schedule changes for one of the mine units, then the schedule for all mine unit restoration plans will need to be updated. Remove Appendix E and reference the approved schedule in the mine unit restoration plan. **(SI)**
- 6 **Response Not Acceptable.** The text in the response needs to be included in the text of the Mine Unit Restoration plan. **(SI)**

LQD is reviewing the IRP for Mine Unit H. Until that plan has been approved, CR may not proceed with restoration activities in that mine unit.

Please continue to provide Index of Change sheets for all rounds of reviews so that the appropriate changes to the submittal are made. If you have any questions, please contact me at pam.rothwell@wyo.gov or 307-777-7048.

Sincerely,



Pam Rothwell
Permit Coordinator/District I Assistant Supervisor
Land Quality Division

Enclosure

cc: Cameco Resources, Cheyenne, WY 82001
Doug Mandeville, NRC