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P.O. Box 78

Interior, SD 57750 Statement to the NRC Atomic Safety and Licensing Board

*Re: Contentions 3, 6 and 9*

On January 9 this year 300,000 people in West Virginia experienced toxic chemical poisoning in their drinking water. The company's data not only inaccurately stated the true potency of the chemical, 4-methylcyclohexane (MCHM), but neglected to report the additional toxic mixture of glycol ethers (PPH) until two weeks later.

The "community right-to-know" act of 1986 requires the public to have knowledge of hazardous and toxic chemicals at individual facilities, for use in the protection of not just the workers, but the public's health and the health of the environment.

transparency 1: (Figure 5.3-4)

This is the diagram of the Dewey-Burdock Project's Central Processing Plant, showing storage of the various chemicals to be used. In Powertech's September 2012 application narrative, nine chemicals are specifically named. Barium Chloride, #40, is stored here. Stored outside will be Sulfuric Acid and/or Hydrochloric Acid, Hydrogen Peroxide, and Sodium Hydroxide.

Sodium Hydroxide, which is #2, will be stored here, as precisely indicated in the Key Notes.

Close transparency.

The Project's application says "All chemical storage tanks will be clearly labeled to identify contents", and "... will help ensure the safety of Powertech (USA) employees and members of the public, with regard to the specific chemicals ... in the event of an accident." (p. 5-21, Dewey-Burdock Permit)

transparency 2:

Here's a closer look at the Key Notes. #2 is clearly the symbol in English for Sodium Hydroxide. What are the 22 additional unduplicated chemicals listed in the Key Notes? None of these chemicals are labeled with standard English formulas; though 1, 3, and 4, to my unpracticed eye, look part-Chinese. Not listed in the Key Notes are seven chemicals that are named and described in the application, although they may be on the Key Notes list with non-English labels. What precisely are these 22 chemicals?

What is the precise composition of the various chemicals and chemical mixtures that will be used in the proposed uranium mining and ore processing? What dangers do they pose? Have these chemicals and chemical mixtures been tested for human safety? If the company is so sure of the safety of their mining processes, why have they requested an exemption from the Safe Drinking Water Act?

Full disclosure will help local and state first responders and health care professionals fully prepare and train for accidents and potentially dangerous contamination incidents. Emergency response plans must be made before, not after, an incident.

(over)

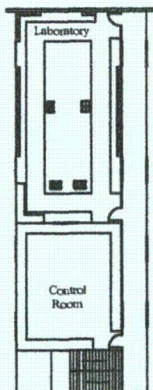
We are concerned not only about radiological hazards. We have a right to know all the chemicals that will impact our water during extraction and processing, as well as the chemical make-up of the waste disposed into the deep disposal wells. What will be the impact on the ecosystem of the surrounding area from the proposed land application system? The excess waste will be spread on the land, permitting harmful toxins to seep into the ground and groundwater, and from there absorbed by plants, animals, and eventually humans.

We don't want the formulas, the concentrations and amounts, but the public has the right to know the character of the chemicals used and the toxic effects of any which are hazardous.

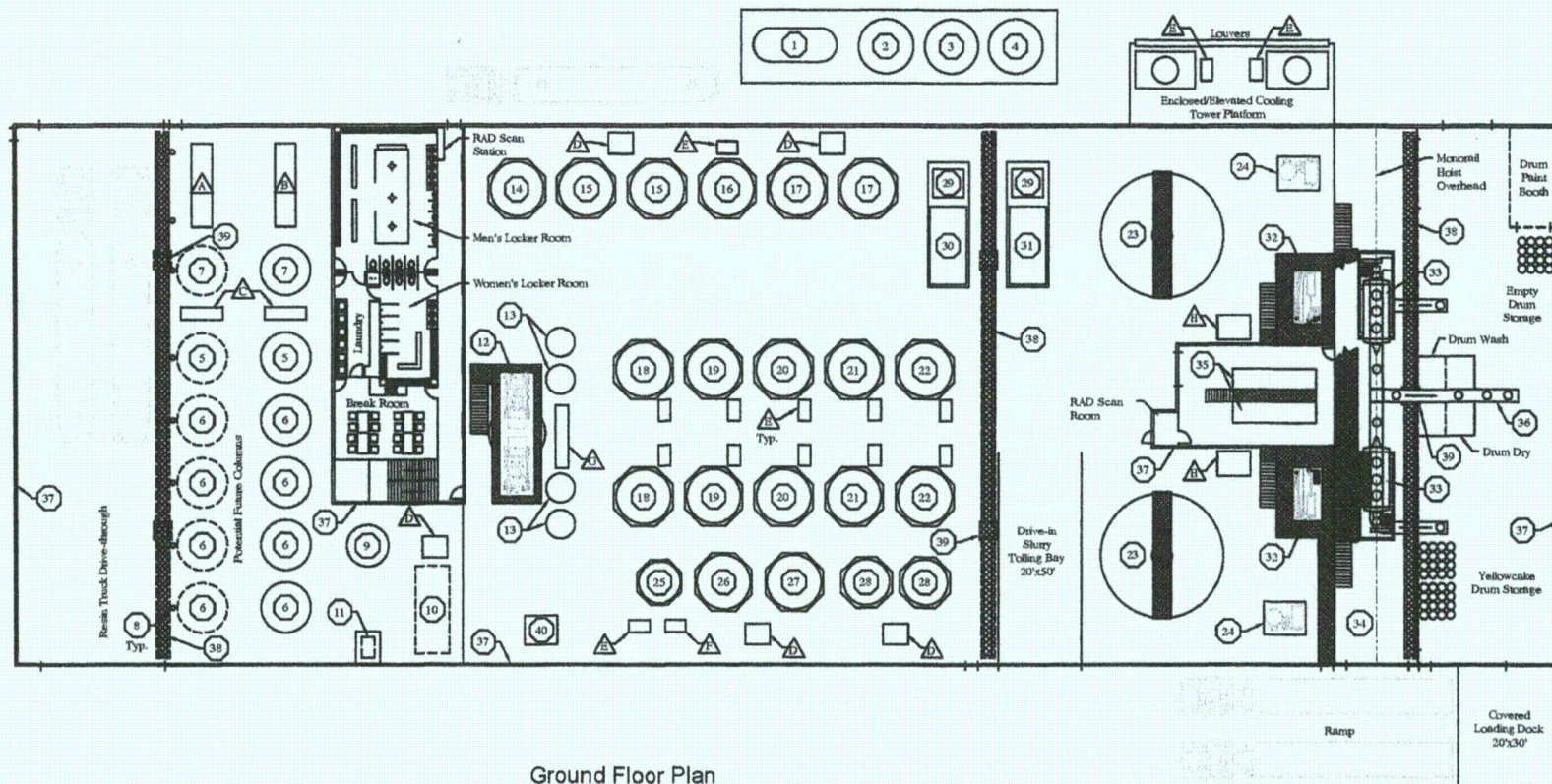
When I looked at #9 and saw the word "gulp", I did just that----- It's alarming to see so many mysteriously labeled chemicals with no explanation from the mining company.

South Dakota doesn't need a West Virginia catastrophe, or any of the other types of toxic events so recently multiplying throughout this country.

With these failures in Powertech's FSEIS: Contention 3 (Potential Impacts to Groundwater), Contention 6 (Mitigation Measures), and Contention 9 (Connected Actions), a license for this uranium recovery facility is not in the best interests of the people and should be denied.



Second Floor Plan



Ground Floor Plan

Key Notes

1 EQ	14 T gese vlap "O cng/w" Y cgt"35) 1	27 Nzy "VF UY eugy cgt"Vcpnt35) 1	40 Barium Chloride Storage
2 NaOH	15 PcE/35) 1	28 Uqk uT go qce/vcpnt35) 1	
3 J 100Q.	16 PcE/35) 1	29 RO Pre-treatment	
4 J 100Q.	17 Wdk "Y cgt"35) 1	30 Recovery RO Unit	
5 T gese vlap "E cmo p"34) 1	18 Hgk "Gncp"35) 1	31 Restoration RO Unit	
6 Rqegu "E cmo p"34) 1	19 Ngcp "Gncp"35) 1	32 Elevated Condenser/Vacuum Pump Skid 7'x13'	
7 Dgg "E cmo p"34) 1	20 Hgko gl kv "Gncp"35) 1	33 Vacuum Dryer 8'x24'	
8 Pipe Bolted Guard Post	21 T lq "Gncp"35) 1	34 Dryer Room 20'x130'	
9 T gup "Vcpnt"Y cgt"32) 1	22 Rgk h vlap"35) 1	35 Filter Press and Transfer Pump 5'x20'	
10 Resin Superstack Storage	23 S2) "Vj hmggt.7) "Lj get"Vcpnt35) 1	36 Drum Conveyor	
11 Standby Generator in Sound Insulated Room	24 Hot Oil Boiler	37 6" Cutt Off All Walls, Typ.	
12 Shaker Screens with Shaker Overflow Collection Tank Below	25 Rqcdg "Y cgt"32) 1	38 2'-0" Trench Dmin, Typ.	
13 Gmkg "E cmo p"35) 1	26 J k j "VF UY eugy cgt"Vcpnt35) 1	39 3'-0" Sump, Typ.	

Housekeeping Pads

5'x20' - PC Booster Pumps
5'x20' - IC Booster Pumps
3'x10' - Pump
6'x5' - Pump
3'x5' - Pump
3'x5' - Disinfectant
3'x15' - Pump
6'x5' - Pump

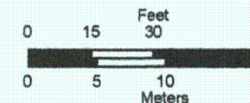


Figure 5.3-4

Central Processing Plant

Dewey-Burdock Project

SIGNATURE OF PREPARER	John Mays
PREPARER	John Mays
DATE	18-Sep-2012
FILE	CPP-Floorplan.dwg

POWERTEC



## Key Notes

1 EQ猫	14 T geroo cvlqp"Ocmg/w "Y cvgt"35)青	27 Nqy "VFU"Y cugy cvgt"Vcpnt35)青
2 NaOH	15 PcEt35)青	28 UqH uT go qxcH/Vcpnt33)青
3 J猫Q.	16 Pc猫QT35)青	29 RO Pre-treatment
4 J猫猫	17 WlH "Y cvgt"35)青	30 Recovery RO Unit
5 T geroo cvlqp"KZ"E qmo p"34)青	18 Htgj "GwcpV35)青	31 Restoration RO Unit
6 RtqeguH"E qmo p"34)青	19 Ngcp"GwcpV35)青	32 Elevated Condenser/Vacuum Pump
7 Drggf "KZ"E qmo p"34)青	20 Ipvgto gf lcvg"GwcpV35)青	33 Vacuum Dryer 8'x24'
8 Pipe Bollard Guard Post	21 T lej "GwcpV35)青	34 Dryer Room 20'x130'
9 T gupl"Vtcpuigt"Y cvgt"32)青	22 Rtgek kvlqp"35)青	35 Filter Press and Transfer Pump 5'x2
10 Resin Supersack Storage	23 52)青VJ lengpgt."7)青Uj get"VcpntDgray	36 Drum Conveyor
11 Standby Generator in Sound Insulated Room	24 Hot Oil Boiler	37 6" Curb Off All Walls, Typ.
12 Shaker Screens with Shaker Overflow Collection Tank Below	25 Rqvcdg"Y cvgt"32)青	38 2'-0" Trench Drain, Typ.
13 Gwvqp"E qmo p"9)青	26 JHJ "VFU"Y cugy cvgt"Vcpnt35)青	39 3'-0" Sump, Typ.