



STATE OF IDAHO

DEPARTMENT OF HEALTH
AND WELFARE

DIVISION OF ENVIRONMENT
Statehouse
Boise, Idaho 83720

July 2, 1979

U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Director, Division of Waste Management

Dear Sirs:

The Division of Environment, Idaho Department of Health and Welfare has reviewed draft generic E. I. S. on Uranium Milling and we wish to submit the following comments.

1. A source of this type must comply with the Rules and Regulations for the Control of Air Pollution in Idaho. Any new uranium milling operation such as that proposed must comply with regulations on fugitive dust, control of particulate matter, visible emissions, new source review (if located in a non-attainment area), prevention of significant deterioration (when the State is delegated authority for the Program), and permit requirements.

The fugitive dust regulation requires use of all reasonable precautions to minimize dust emissions.

Any processing equipment must meet a weight limitation of Total Particulates discharged based on the amount of material fed to the process.

Any source impacting a non-attainment area must employ best technology to reduce emissions. Regulations now being proposed pursuant to the Clean Air Act will require many new sources to reduce emissions from existing equipment before construction in order to offset new emissions.

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The Prevention of Significant Deterioration program requires most sources to employ best technology for reducing emissions and not to exceed incremental ambient air quality levels in adjacent areas.

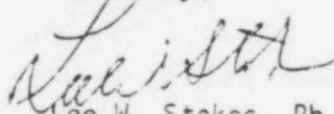
All new sources of air pollution must obtain a permit from the Department of Health and Welfare before construction.

2. A milling operation in Idaho must comply with Idaho Water Quality Standards and Wastewater Treatment Requirements including Section III.D which provides that all waters of the State will not be lowered in quality unless such change is justifiable and will not injure assigned uses of the waters.

With regard to surface water impacts, Sections 6.2.4.1 and 9.3.4.1 suggest that water quality degradation will be minimal. As a result, few mitigative measures are proposed in Chapter 12. To protect water quality all surface waters should be contained on the site during both construction and operation. This will prevent surface water pollution from sediment, toxic materials or other pollutants.

Thank you for the opportunity to comment on this statement.

Sincerely,



Lee W. Stokes, Ph. D.
Administrator

LWS/bg

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