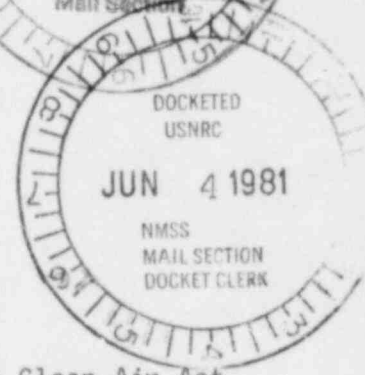
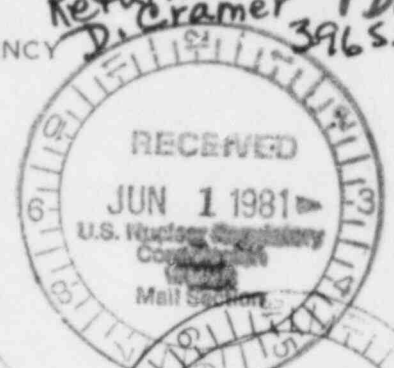




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION VIII  
 1860 LINCOLN STREET  
 DENVER, COLORADO 80295

Docket No 90-8745

Return to  
 D. Cramer PDR  
 39655



JUN 2 1981

REF: 8AH-NR

Mr. Ross A. Scarano, Chief  
 Uranium Recovery Licensing Branch  
 Division of Waste Management  
 U.S. Nuclear Regulatory Commission  
 Washington, D.C. 20555

Dear Mr. Scarano:

According to our responsibilities under Section 309 of the Clean Air Act, enclosed are the review comments by the Region VIII Office of the Environmental Protection Agency on the Final Environmental Statement (NUREG-0687) related to the Ogle Petroleum Bison Basin Project.

We must reiterate our comment number 12, that the target restoration value for uranium should be the current observed baseline range, that is, less than 0.04 mg/l. The proposed 5 mg/l restoration standard is two to three orders of magnitude above existing values.

The assumption that just because the water does not presently meet drinking water standards, it is not necessary to try to reduce the levels of uranium closer to baseline, seems a bit broad. The only primary drinking water standard that is presently exceeded by water in the ore zone is that for radium 226 which can be removed without great difficulty. The standards for sulfate and TDS are secondary standards which are exceeded in many public water systems.

As we stated in our August 19, 1980 comments, EPA is presently preparing a uranium-in-drinking-water standard which could be as low as 10 pCi/l. Even if the standard were 20 or 30 pCi/l, the proposed restoration targets would still be orders of magnitude greater.

EPA's Underground Injection Control Program requires protection of all aquifers as Underground Sources of Drinking Water (USDW) if they contain less than 10,000 mg/l TDS, unless the aquifer has been exempted from protection for an allowable reason. The ore zone itself would have to be exempted in order for this project to operate. There is also a stipulation that the operator show that no migration out of the permit (exempted) area into a USDW will occur after abandonment. This implies that clean-up must be sufficient to insure that migration of various constituents will not be a problem. If a Uranium Standard such as those listed above were established sometime prior to

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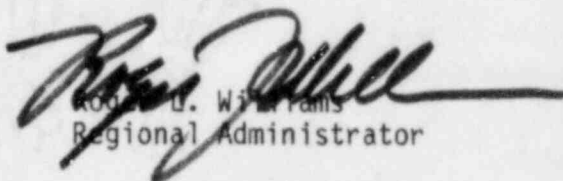
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Comment

abandonment, the applicant would have to demonstrate that a clean-up of uranium to 5 mg/l (or in excess of 3,000 pCi/l) would be sufficient to meet the no migration requirement.

Should you have any questions concerning these comments, please contact the Radiation Control Staff.

Sincerely yours,



Robert D. Williams  
Regional Administrator