



State of Utah

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GARY HERBERT
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Department of
Environmental Quality

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Executive Director

DIVISION OF RADIATION CONTROL
Dane L. Finerfrock
Director

September 10, 2008

Mr. Harold R. Roberts
Executive Vice President – US Operations
Denison Mines (USA) Corp. (DUSA)
1050 17th Street, Ste. 950
Denver, CO 80225

Dear Mr. Roberts:

SUBJECT: September 5, 2008 DUSA Email conveying the Proposed Revisions to the *White Mesa Mill Tailings Management System and Discharge Minimization Technology (DMT) Monitoring Plan (DMT Plan)* and the *Cell 4A BAT Monitoring, Operations and Maintenance Plan (O&M Plan)*; September 4, 2008 DRC Letter, subject as above;
Comments and Request for Information

We received and reviewed the subject submittal. The submittal conveyed two documents, i.e. "09/08 Revision: Denison-5" of the DMT Plan and the "09/08 Revision Denison 1.1" of the O&M Plan. We compared this submittal to our letter dated September 4, 2008, and have the following comments:

Regarding the Subject O&M Plan:

- a) The attachments in the September 2, 2008 version were omitted from the September 5, 2008 submittal. Please submit a complete and current version that includes the attachments.
- b) On the last page of the O&M Plan, the table of "Calculated Action Leakage Rates [ALR] for Various Head Conditions Cell 4A White Mesa Mill," needs to be labeled as Table 1 in order to complete references made in the body of the plan (per page 6, paragraph 3).
- c) A provision requiring any leak detection system (LDS) pumping or monitoring equipment discovered not to be operational, to be repaired or made fully operational within 24-hours of discovery, needs to be added to the section on page 5 titled "BAT Performance Standards for Tailings Cell 4A" (Permit Part I.E.8(a)(1)). This issue was brought to your attention in two previous DRC letters dated August 26, and September 4, 2008 (comments numbered 9).
- d) On page 8 of the O&M Plan, please add verbiage for a compliance evaluation that is:
 - 1) Based on both a maximum LDS fluid level and a maximum daily average LDS flow limit, and
 - 2) Completed within 24-hours of weekly data collection.This issue was brought to your attention previously in the DRC letter dated September 4, 2008 (comment no. 9).

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Regarding the Subject DMT Plan:

- e) The fourth paragraph on page 6 makes reference to comparison of measured daily average flow rates with maximum LDS flow rates defined on Table 1 of Appendix A. However, no such corresponding table number is identified in Appendix A. Please label all tables in Appendix A of the DMT Plan and revise the body of the text as necessary to ensure all tables correspond as needed.
- f) Please ensure that BAT compliance criteria in the DMT Plan are consistent with those outlined in the BAT O&M Plan.

Please review the above comments, and incorporate them as appropriate into the subject plans. We further request you submit both redline/strikeout, and clean copies of revised DMT and O&M Plans for our review and approval. If you have any questions on the above, please contact me or Mr. Rupp.

Sincerely,



Loren B. Morton, Manager
Geotechnical Services Section

LBM:DAR:dr

cc: Mr. Ron Hochstein, President