



State of Utah

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Department of
Environmental Quality

Alan Matheson
Executive Director

DIVISION OF WASTE MANAGEMENT
AND RADIATION CONTROL
Scott T. Anderson
Director

February 22, 2017

Kathy Weinel, Quality Assurance Manager
Energy Fuels Resources (USA) Inc.
225 Union Blvd., Suite 600
Lakewood, CO 80228

RE: January 16, 2017 Transmittal of Revised Groundwater Compliance Limits
for Manganese and Cadmium in Monitoring Well MW-3A
Groundwater Discharge Permit No. UGW370004 (Permit)

Dear Ms. Weinel:

The Division of Waste Management and Radiation Control has completed its review of the document titled "*Transmittal of Revised Groundwater Compliance Limits for Manganese and Cadmium in MW-03A*" dated January 16, 2017.

The revised Ground Water Compliance Limits (GWCLs) were prepared by EFR by request of the Division. The Division communicated its concerns via a telephone conversation and an e-mail on December 20, 2016. Based on a review of the data sets, the Division noted that the current GWCLs for cadmium and manganese were excessively high as affirmed by statistical evaluation. Additionally, it was noted that in accordance with the 2005 Statement of Basis for the Permit, it was intended that the MW-3A GWCLs should be revisited after additional data had been collected.

EFR subsequently reviewed the data and submitted a January 16, 2017 Intera memo summarizing EFR's recalculated GWCLs for cadmium and manganese in MW-03A (received by the Division on January 18, 2017). The Division, EFR and Intera representatives discussed the memo via telephone conference on January 11, 2017, prior to submission and agreed that the proposed revised GWCLs appeared to appropriately reflect the current data sets, were in line with the Division's evaluation, and were substantially lower than the previous limits.

(Over)

MW-3A Approved Modified GWCLs

The following table summarizes the GWCLs that will be modified in the White Mesa Uranium Mill Ground Water Permit:

Well Number	Parameter	Current GWCL	Modified GWCL	Method of Analysis
MW-3A	Cadmium	8.3 ug/L	3.55 ug/L	Highest Historical Value
MW-3A	Manganese	6,287 ug/L	383 ug/L	Mean + 2 σ

If you have any questions, please call Tom Rushing at (801) 536-0080.

Sincerely,



Scott T. Anderson, Director
Division of Waste Management and Radiation Control

STA/TR/ka

- c: Kurt Binge, Health Officer, San Juan County Health Department
Rick Meyer, Environmental Health Director, San Juan County Health Department