



State of Utah

Department of  
Environmental Quality

Dianne R. Nielson, Ph.D.  
*Executive Director*

William J. Sinclair  
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*Governor*

GARY HERBERT  
*Lieutenant Governor*

February 17, 2005

Don Metzler  
Moab Federal Project Director  
U.S. Department of Energy  
2597 B  $\frac{3}{4}$  Road  
Grand Junction Colorado 81503

Dear Mr. Metzler:

RE: Moab Uranium Mill Tailings, Draft Environmental Impact Statement,  
DOE/EIS-0355D, State of Utah Comments

Please find enclosed detailed comments from the State of Utah regarding the above-referenced Draft Environmental Impact Statement (DEIS). These comments were referenced in Governor Huntsman's letter of February 15, 2005.

The enclosed comments from the Department of Environmental Quality (DEQ) focus on several issues that continue to support moving the pile. Among those concerns are: 1) the potential for the Colorado River to migrate and damage the tailings pile if it is left on the mill site; 2) the uncertainty of costs associated with long-term groundwater cleanup; 3) the acknowledgement by DOE that a second pulse of ammonia contamination will leach from the upper layers of the pile, if left in place; 4) the increased clean-up costs for groundwater in the future if the pile is not moved; and 5) use of the wrong ammonia surface water standard for a groundwater cleanup goal.

Calculations by DEQ included in the comments show that, with a continued need for 200 or more years of actual groundwater cleanup, beyond the assumed 200 years in the DEIS, the costs for the On-site Stabilization Alternative are comparable to the costs for moving the tailings to Klondike Flats. Based on those considerations, moving the pile is a cost-efficient solution, which also avoids the risk of river migration and possible undercutting of the pile. If the second pulse of ammonia contamination is considered, as discussed in the DEQ comments, an additional 440 years of active groundwater remediation could be necessary. Under that scenario, moving the tailings to Klondike Flats is less expensive.

Referenced and included as part of DEQ's comments are two studies regarding river migration, potential erosion of the tailings, and hydrology of the systems:

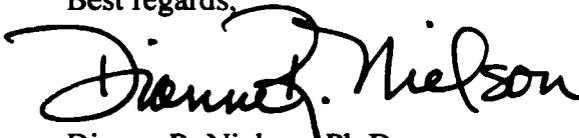
Attachment 1 – U.S. Geological Survey, Scientific Investigations Report No. 2005-5022; Initial-Phase Investigation of Multi-Dimensional Streamflow Simulations in the Colorado River, Moab, Valley, Grand County, Utah, 2004, by Terry a. Kenney, dated February 11, 2005.

Attachment 2 – Investigation of the Hydrologic Connection Between the Moab Mill Tailings and the Matheson Wetland Preserve, by Philip Gardner and D. Kip Solomon, Department of Geology and Geophysics, University of Utah, dated December 11, 2003.

Also enclosed are two letters, both dated February 9, 2005, with comments from the Utah Division of Wildlife Resources and the Utah Division of Forestry, Fire and State Lands.

The time has come to move the pile off the banks of the Colorado River and transport it to a repository at Klondike Flats. Thank you for your ongoing stewardship responsibilities for the Moab Millsite and your consideration of the enclosed comments.

Best regards,

A handwritten signature in black ink that reads "Dianne R. Nielson". The signature is written in a cursive style with a large, looping initial "D".

Dianne R. Nielson, Ph.D.  
Executive Director

Enclosures