

October 4, 2011

**Request for Public Comments at Oct 5, 2011 Teleconference Call October 4, 2011 11:03 am**

From: UraniumReview  
To: Jack Kooyoomjian/DC/USEPA/US@EPA  
Cc: Glenna Shields/DC/USEPA/US@EPA, Andrea Cherepy/DC/USEPA/US@EPA  
Sent by: Tony Nesky/DC/USEPA/US

Dear Jack:

A geochemist has asked to participate in the October 5 teleconference. His issues are below. I'll ask him to contact you directly to register to get information.

Tony

----- Forwarded by Tony Nesky/DC/USEPA/US on 10/04/2011 11:01 AM -----

From: richard abitz  
To: UraniumReview@EPA  
Date: 10/03/2011 08:38 PM  
Subject: Public input on regulations to establish standards for human health and environment from radiological hazards associated with uranium ISL industry

I received the notice about the October 5 public teleconference today and would like to request that I be given an opportunity to speak at the meeting. The issues I would like to discuss are:

1) Collecting representative samples from the volume of groundwater that is within the proposed aquifer exemption zone. This requires that baseline water quality be established early in the exploration phase using a random selection of wells from the nodes on the grid used for exploration boreholes. Wells must be drilled with reducing fluids to prevent oxidation of the ore zone and cannot be developed with air purging. The screen interval must be through the entire thickness of sand to obtain a sample from the entire column of water. At least 4 quarterly samples must be collected.

2) Upper control limits for excursion parameters must be established with valid statistical methods using groundwater quality data from the monitor well ring. Present practice allows the use of groundwater quality data from the ore zone to set the excursion level at a monitor well that is not in the ore zone. Additionally, there is no valid basis for deriving the control limit for the excursion. For uranium, the mining company is allowed to use the maximum value from the ore zone and add 5 mg/L to the max value to establish the upper control limit for excursion at the monitor well ring, where uranium values are less than the EPA MCL for uranium (<0.03 mg/L). This practice allows legal pollution of a groundwater resource because uranium concentrations of less than 5 mg/L can pass the monitor well ring without reporting an excursion.

Again, I would appreciate the opportunity to speak on these issues during the Oct 5 meeting.

Sincerely,

Richard J. Abitz, PhD  
Principal geochemist  
Geochemical Consulting Services, LLC.