



November 14, 2008

Attn: Charles Garlow, Attorney-Advisor
OECA, Air Enforcement Division
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, N.W. – MC 2242A
Washington, DC 20460

Dear Mr. Garlow:

Enclosed please find our response to the Request to Provide Information Pursuant to the Clean Air Act as discussed in the EPA letter to COGEMA Mining, Inc. dated September 2, 2008, signed by Adam Kushner, Director Air Enforcement Division. This is the second submittal in response to the request for information. The initial response, submitted on October 8, 2008, addressed the first three questions of Appendix B to the referenced EPA letter. This submittal addresses questions 4 through 6 of Appendix B.

Included under this cover letter is a narrative which addresses each question, a CD which contains various pdf files of supporting documentation that is referenced in the narrative, a guide which correlates the different referenced documents in the narrative with the correct pdf files, and a certification signed by the General Manager for COGEMA Mining, Inc. and Pathfinder Mines Corporation, Mr. Bernard Bonifas. If you have any questions regarding the submitted information, do not hesitate to contact me.

Sincerely,

Tom Hardgrove
Manager, Environmental and Regulatory Affairs

Encls.

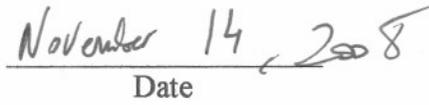
Cc: Andrew M. Gaydosh, U.S. EPA Region 8
T. Pennington, AREVA NC (w/o CDs)
B. Bonifas (w/o CDs)

CERTIFICATION STATEMENT

Concerning the Appendix B Responses (responses to questions 4 through 6) submitted to EPA on November 14, 2008,

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to section 113(c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341.


Bernard Bonifas, General Manager


Date

COGEMA Mining, Inc. & Pathfinder Mines Corp.

Appendix B Response to EPA Inquiry Dated September 2, 2008.

Second Phase (Questions 4-6) Responses Submitted to EPA November 14, 2008

Prepared by T. Hardgrove, Manager, Environmental and Regulatory Affairs

4. Additional information on each pond identified in response to request 3.d):

a) None of the identified impoundments in 3.d utilized the continuous disposal method. The ponds containing solid tailings at both of Pathfinder's sites (Lucky Mc and Shirley Basin) were all constructed before December 15, 1989 as specified in 40 CFR 61, § 61.252(b). All of the ponds identified for COGEMA Mining, Inc. sites in 3.d are or were solution only storage/evaporation ponds containing no tailings.

b) Not applicable. As noted in 4.a, none of the ponds utilized the continuous disposal method for solid tailings.

c) Disposal Records:

Conventional Uranium Mill and Tailings Facilities -

Pathfinder Mines Corp. Lucky Mc Mine: The tailings ponds at this site pre-date the effective date of 40 CFR §61.252 relative to work practices. Tailings were deposited by discharging a tailings slurry, forming typical beaches and allowing most of the liquid portion of the slurry to flow to the central pool of a tailings pond. Specific disposal records are not readily available (if they exist at all). Such disposal has not occurred at this site for over twenty years. The method of covering tailings is recounted in the tailings reclamation completion report included as a pdf file on a CD included with this submittal. The cleanup of contaminated soils in areas adjacent to the tailings is presented in the Lucky Mc Mill Site Completion Report, February, 1998, also included on the CD.

Pathfinder Mines Corp. Shirley Basin Mine: The tailings ponds at this site pre-date the effective date of 40 CFR §61.252 relative to work practices. Tailings were deposited by discharging a tailings slurry, forming typical beaches and allowing most of the liquid portion of the slurry to flow to the central pool of a tailings pond. Specific disposal records are not readily available (if they exist at all). Such disposal has not occurred at this site for over sixteen years. The tailings were covered on an interim basis before placement of the final radon barrier cover. A post-decommissioning/reclamation report has yet to be prepared for this site, but the covering process was done as specified in the Shirley Basin Tailings Reclamation plan, included with this submittal as a pdf file on a CD. The cleanup of wind dispersed tailings-contaminated soils in areas adjacent to the tailings is presented in

the Shirley Basin Mill Site Completion Report for Reclamation of Off-Pile Windblown Area, October, 1999, included on a CD.

In-situ Leaching Facilities -
COGEMA Mining, Inc., Irigaray Mine and Christensen Ranch
Satellite Facility: Not applicable – there are no tailings.

COGEMA Mining, Inc. Holiday-El Mesquite, O'Hern, and West
Cole Facilities: Not applicable – there are no tailings.

- d) Emissions data: See response to item 6 below.
- e) Compliance with 10 acres maximum uncovered at any one time, as specified in 40 CFR Section 61.252(b)(2): As noted in 4.a above, all of Pathfinder's solid tailings ponds were constructed prior to December 15, 1989, and were not subject to the requirements of 40 CFR Section 61.252(b). Because all COGEMA Mining, Inc. ponds are solution only the work practices of 40 CFR 252(b) do not apply.
- f) Proof of compliance with 40 CFR § 192.32(a):
Conventional Uranium Mill and Tailings Facilities -
Pathfinder Mines Corp. Lucky Mc Mine:
1. Ponds construction [§ 192.32(a)(1)]: All tailings ponds at the site pre-date the effective date (December 6, 1983) of 40 CFR § 192.32(a).
 2. Conformance to the ground water protection standard [§192.32(a)(2)]: Included with this submittal as pdf files copied to a CD are NRC Source Material License SUA-672 which contains license condition 60 that incorporates alternate concentration limits for the site, a copy of the application for alternate concentration limits, and the NRC staff environmental assessment prepared in support of the alternate concentration limits approval.
 3. Placement of a permanent radon barrier [§192.32(a)(3)]: Included with this submittal as pdf files copied to a CD are the reclamation (closure) plan for the Lucky Mc tailings site, the license approvals of the reclamation plan, the NRC staff environmental assessment and technical evaluation accompanying the plan approvals, the tailings reclamation completion report (two volumes), and the NRC approval of the completion report as license amendment number 69.
 4. Monitoring of radon releases through the permanent radon barrier [§192.32(a)(4)]: See the tailings reclamation completion report, volumes 1 and 2, for discussion, data, and laboratory reports relating to the post-construction radon barrier flux testing results.
 5. Management of uranium byproduct materials in conformance with Part 190 and Part 440 of 40 CFR Chapter 1 [§192.32(a)(5)]:

Included with this submittal as pdf files copied to a CD are the dose to the public evaluations done prior to closure. Such evaluations were not continued during the closure period. There were no liquid effluent discharges relating to the tailings site.

Pathfinder Mines Corp. Shirley Basin Mine:

1. Ponds construction [§ 192.32(a)(1)]: All tailings ponds at the site pre-date the effective date (December 6, 1983) of 40 CFR § 192.32(a).
2. Conformance to the ground water protection standard [§192.32(a)(2)]: Included with this submittal as pdf files copied to a CD are NRC Source Material License SUA-442 which contains license condition 47 that incorporates alternate concentration limits for the site, a copy of the application for alternate concentration limits, and the NRC staff technical evaluation report prepared in support of the approved alternate concentration limits.
3. Placement of a permanent radon barrier [§192.32(a)(3)]: Included with this submittal as pdf files copied to a CD are the reclamation (closure) plan for the Shirley Basin Mine tailings site, the license approval of the reclamation plan, and the NRC staff technical evaluation accompanying the plan approval. All closure plan construction relating to the Shirley Basin tailings (directly on the tailings) has been completed with the exception of Pond 3 which is still being utilized for NRC authorized disposal of 11e.(2) byproduct material from certain ISL operations. Because some peripheral (off tailings) channel features have not been completed as of this submittal an interim tailings reclamation completion report has not been submitted to the NRC. Submittal of an interim completion report (covering all tailings/mill site areas exclusive of Pond 3) is anticipated late in 2009.
4. Monitoring of radon releases through the permanent radon barrier [§192.32(a)(4)]: Included with this submittal as a pdf file copied to a CD is a summary of the radon flux test results conducted on the final radon barrier completed to date. Also included are pdf files of the laboratory radon flux test data, and a map illustrating the sampling grid for the radon flux tests conducted to date on the final clay radon barrier.
5. Management of uranium byproduct materials in conformance with Part 190 and Part 440 of 40 CFR Chapter 1[§192.32(a)(5)]: Included with this submittal as pdf files copied to a CD are the dose to the public evaluations done prior to closure. Such evaluations were not continued during the closure period. There were no liquid effluent discharges relating to the tailings site.

In-situ Leaching Facilities -

COGEMA Mining, Inc., Irigaray Mine:

1. Ponds construction [§ 192.32(a)(1)]: All ponds at the site pre-date the effective date (December 6, 1983) of 40 CFR § 192.32(a).
2. Conformance to the ground water protection standard [§192.32(a)(2)]: Included with this submittal as pdf files copied to a CD are NRC Source Material License SUA-1341 which establishes operational conditions regarding ground water protection, the wellfield restoration report dated July, 2004, and the subsequent ground water restoration approvals by the Wyoming Department of Environmental Quality (WDEQ) and the NRC. Both the WDEQ and NRC have accepted ground water restoration at ISL facilities to a secondary class of use standard for select constituents that did not meet the primary restoration target (a return to baseline levels).
3. Placement of a permanent radon barrier [§192.32(a)(3)]: Not applicable to an ISL facility – there are no tailings. All other byproduct materials have been or will be removed and transported to the Shirley Basin Mine tailings site or other licensed facility for disposal.
4. Monitoring of radon releases through the permanent radon barrier [§192.32(a)(4)]: Not applicable.
5. Management of uranium byproduct materials in conformance with Part 190 and Part 440 of 40 CFR Chapter 1 [§192.32(a)(5)]: Included with this submittal as pdf files copied to a CD are the dose to the public evaluations done prior to the latest suspension of operations. Such evaluations were not continued during the closure period. Liquid effluent discharges relating to the ISL operations were conducted under a NPDES permit issued by the WDEQ. A copy of the last NPDES permit and representative discharge reports submitted under the permit are included as pdf files on a CD.

COGEMA Mining, Inc., Christensen Ranch Satellite Facility:

1. Ponds construction [§ 192.32(a)(1)]: All ponds at the site were constructed consistent with the approved mine permit update to WDEQ and the NRC license update (same document - see pdf files on the CD).
2. Conformance to the ground water protection standard [§192.32(a)(2)]: Included with this submittal as pdf files copied to a CD are NRC Source Material License SUA-1341 which establishes operational conditions regarding ground water protection and the wellfield restoration report dated March 5, 2008 which has been submitted to both the WDEQ and the NRC. That document is currently under review by both agencies.

3. Placement of a permanent radon barrier [§192.32(a)(3)]:
Not applicable to an ISL facility – there are no tailings. All other byproduct materials have been or will be removed and transported to the Shirley Basin Mine tailings site or other licensed facility for disposal.
4. Monitoring of radon releases through the permanent radon barrier [§192.32(a)(4)]: Not applicable.
5. Management of uranium byproduct materials in conformance with Part 190 and Part 440 of 40 CFR Chapter 1 [§192.32(a)(5)]:
Included with this submittal as pdf files copied to a CD are the dose to the public evaluations done prior to the latest suspension of operations. Such evaluations were not continued during the closure period. Liquid effluent discharges relating to the ISL operations were conducted under a NPDES permit issued by the WDEQ. A copy of the last NPDES permit and representative discharge reports submitted under the permit are included as pdf files on the CD.

COGEMA Mining, Inc., Holiday-El Mesquite Facility:

1. Ponds construction [§ 192.32(a)(1)]: All ponds at the site pre-date the effective date (December 6, 1983) of 40 CFR § 192.32(a).
2. Conformance to the ground water protection standard [§192.32(a)(2)]: Included with this submittal as pdf files copied to a CD are the Texas Radioactive Materials License L03024 which establishes operational conditions regarding ground water protection and the various wellfield restoration authorizations (approvals) issued by the State of Texas.
3. Placement of a permanent radon barrier [§192.32(a)(3)]:
Not applicable to an ISL facility – there are no tailings. All other byproduct materials have been or will be removed and transported to the Shirley Basin Mine tailings site or other licensed facility for disposal.
4. Monitoring of radon releases through the permanent radon barrier [§192.32(a)(4)]: Not applicable.
5. Management of uranium byproduct materials in conformance with Part 190 and Part 440 of 40 CFR Chapter 1 [§192.32(a)(5)]:
Included with this submittal as pdf files copied to a CD are recent dose to the public evaluations. The enclosed reports reference the Texas Administrative Code at 25 TAC 289.202. Due to a reorganization of the code, the current reference is 30 TAC §336.313 which in turn references 40 CFR Part 190. Liquid effluent discharges relating to the ISL operations did not occur at this site.

COGEMA Mining, Inc., O'Hern Facility:

1. Ponds construction [§ 192.32(a)(1)]: The pond at the site pre-dated the effective date (December 6, 1983) of 40 CFR § 192.32(a).
2. Conformance to the ground water protection standard [§192.32(a)(2)]: Included with this submittal as pdf files copied to a CD are the Texas Radioactive Materials License L03024 which establishes operational conditions regarding ground water protection and the various wellfield restoration authorizations (approvals) issued by the State of Texas.
3. Placement of a permanent radon barrier [§192.32(a)(3)]: Not applicable to an ISL facility – there are no tailings. All other byproduct materials have been or will be removed and transported to the Shirley Basin Mine tailings site for disposal.
4. Monitoring of radon releases through the permanent radon barrier [§192.32(a)(4)]: Not applicable.
5. Management of uranium byproduct materials in conformance with Part 190 and Part 440 of 40 CFR Chapter 1[§192.32(a)(5)]: See discussion above for Holiday-El Mesquite regarding dose to the public evaluations; such evaluations were not done specific to this satellite facility since the main processing facility was at Holiday-El Mesquite. Liquid effluent discharges relating to the ISL operations were not conducted at this site.

COGEMA Mining, Inc., West Cole Facility:

1. Ponds construction [§ 192.32(a)(1)]: The ponds at the site pre-dated the effective date (December 6, 1983) of 40 CFR § 192.32(a).
2. Conformance to the ground water protection standard [§192.32(a)(2)]: Included with this submittal as pdf files copied to a CD are the Texas Radioactive Materials License L03024 which establishes operational conditions regarding ground water protection and the final completion review report (approval) issued by the State of Texas, and the concurrence letter from the NRC.
3. Placement of a permanent radon barrier [§192.32(a)(3)]: Not applicable to an ISL facility – there are no tailings. All other byproduct materials have been or will be removed and transported to the Shirley Basin Mine tailings site for disposal.
4. Monitoring of radon releases through the permanent radon barrier [§192.32(a)(4)]: Not applicable.
5. Management of uranium byproduct materials in conformance with Part 190 and Part 440 of 40 CFR Chapter 1[§192.32(a)(5)]: See discussion above for Holiday-El Mesquite regarding dose to the public evaluations; such evaluations were not done specific to this satellite facility since the main processing facility was at

Holiday-El Mesquite. Liquid effluent discharges relating to the ISL operations were not conducted at this site.

- g) Construction permit applications or permits issued pursuant to 40 CFR §§ 61.07 and 61.08 or any state authority:

Conventional Uranium Mill and Tailings Facilities -
Pathfinder Mines Corporation, Lucky Mc Mine:

Air quality permits for this site were limited to the permit issued by WDEQ for the operation of the mill facility. That permit, MD-28, was issued in June, 1979. It is no longer in effect due to site reclamation. See the enclosed pdf file of the permit. No other specific air quality permits applied to any of the tailings ponds. There was one construction permit issued by WDEQ/Water Quality Division for the construction of an enlargement to the No. 4 tailings embankment, the furthest downgradient structure in the tailings system. None of the other ponds were permitted for construction, primarily due to their vintage.

Pathfinder Mines Corporation, Shirley Basin Mine:

No past air quality permit or pond construction applications/permits could be located in the company files. Due to site closure such records may have been lost.

In-situ Leaching Facilities -

COGEMA Mining, Inc. Irigaray Mine:

There is an air quality permit issued by the WDEQ for the operation of a yellowcake (uranium concentrate) dryer. See the enclosed pdf file of the permit. No other specific air quality permits applied to any of the ponds. A search of existing files produced information from three sources relating to the construction permitting of the ponds at Irigaray. The ponds are presented as part of the mine permit application and NRC license renewal; they are covered by Permits to Construct issued by the WDEQ/Water Quality Division; and they are permitted through the Wyoming State Engineer (see enclosed pdf file regarding Irigaray pond construction permits/applications). Note that the 5I7 ponds referenced in the renewal document were small lined structures utilized in a pilot (feasibility) operation prior to the permitting of full scale operations. Those ponds have been removed (including removal of all radiologically contaminated material) and the site reclaimed.

COGEMA Mining, Inc. Christensen Ranch Satellite Facility:

Since this is a satellite facility to the Irigaray Mine, there is no separate air quality permit issued in conjunction with the site.

See the pdf file for the Wyoming construction permits for the various ponds.

COGEMA Mining, Inc. Holiday-El Mesquite Facility:
Air quality operating permit issued by the Texas Air Control Board for the central plant, primarily relating to the operation of the yellowcake dryer and packaging facilities, and a hot oil heater. All such facilities have been decommissioned, and the air quality permit is no longer in effect. See the enclosed pdf file of the permit. No other specific air quality permits applied to any of the ponds. Only one pond construction permit application could be located in company files (see the enclosed pdf file).

COGEMA Mining, Inc. O'Hern Facility: No air quality permit could be located in company files for this facility. No pond construction application or permit to construct could be found in company files.

COGEMA Mining, Inc. West Cole Facility: No air quality permit located for this facility. Apparently there was an original permit relating to the site, but it could not be found in accessible files. Note that this facility has been permanently closed, decommissioned, and released to unrestricted use. No separate pond construction permit or application to construct was found in company files.

- h) Other permits under the Clean Air Act:
Conventional Uranium Mill and Tailings Facilities -
Pathfinder Mines Corporation, Lucky Mc Mine and Shirley Basin Mine: none.
- In-situ Leaching Facilities -
COGEMA Mining, Inc., Irigaray Mine and Christensen Ranch Satellite Facility: none.
COGEMA Mining, Inc. Holiday-El Mesquite, O'Hern, and West Cole Facilities: none.
- i) Copies of licenses or license applications issued by or filed with the Nuclear Regulatory Commission (NRC):
Conventional Uranium Mill and Tailings Facilities -
Pathfinder Mines Corporation, Lucky Mc Mine: See enclosed pdf file of current license issued by the NRC. Note that this site has been closed and is awaiting permanent transfer to the U.S. Department of Energy. There are no license applications for construction or operation outstanding.

Pathfinder Mines Corporation, Shirley Basin Mine: See enclosed pdf file of current license issued by the NRC. Note that this site has been, for the most part, closed. The only ongoing activity is the licensed disposal of 11.e.(2) material from select ISL operations in the No. 3 pond area. There are no license applications for construction or operation outstanding.

In-situ Leaching Facilities -

COGEMA Mining, Inc. Irigaray Mine and Christensen Ranch Satellite Facility: See enclosed pdf file of the current license issued by the NRC. A license renewal application for the project was submitted to the NRC on May 31, 2008. See enclosed pdf file of the renewal application.

COGEMA Mining, Inc. Holiday-El Mesquite, O'Hern, and West Cole Facilities: See enclosed pdf file of the current license issued by the State of Texas. There are no license applications for construction or operation outstanding since all of these sites are in closure.

j) Copies of any other licenses issued by states under state authority:

Conventional Uranium Mill and Tailings Facilities -

Pathfinder Mines Corporation, Lucky Mc Mine and Shirley Basin Mine: none.

In-situ Leaching Facilities -

COGEMA Mining, Inc. Irigaray Mine and Christensen Ranch Satellite Facility: See enclosed pdf file of mine permit issued by the WDEQ. The mine permit covers aspects of processing plant, including evaporation ponds.

COGEMA Mining, Inc. Holiday-El Mesquite, O'Hern, and West Cole Facilities: none.

k) Current license status:

Conventional Uranium Mill and Tailings Facilities -

Pathfinder Mines Corporation, Lucky Mc Mine: License is in a decommissioning/closure status. Site closure completed; awaiting site transfer to DOE and termination of Pathfinder's license.

Pathfinder Mines Corporation, Shirley Basin Mine: License is in a decommissioning/closure status with proviso for continuation of 11.e.(2) material disposal at the site. Balance of tailings area closure has been completed.

In-situ Leaching Facilities -

COGEMA Mining, Inc. Irigaray Mine and Christensen Ranch Satellite Facility: The license was recently amended by the NRC from a decommissioning status to operational (as yet operations have not started). The NRC considers the license to be under "timely renewal", based on the submittal of the renewal application for continuing operations submitted on May 31, 2008.

COGEMA Mining, Inc. Holiday-El Mesquite, O'Hern, and West Cole Facilities: The Holiday-El Mesquite and O'Hern sites are covered by the same Texas radioactive materials license. Because Texas is an agreement state, the Texas Commission on Environmental Quality is the administrator/licensor of the current license. That license, while technically expired, has continued as a functional regulatory device. Renewal of the license has been postponed in anticipation of the near term completion of decommissioning, and final sites closure. The West Cole facility previously was covered by a separate license, but was subsequently merged into the existing license (L03024). The site has been decommissioned, released for unrestricted use, and the license terminated.

- l) Construction and operation of facilities and ponds in accordance with all permits and federal regulations:

Conventional Uranium Mill and Tailings Facilities –

Pathfinder Mines Corporation, Lucky Mc Mine: To the best of Pathfinder Mines Corporation's knowledge, the construction of the tailings ponds and facilities was done in accordance with the permits and federal regulations in effect at the times of construction. Due to the completion of site decommissioning, there are no current operations.

Pathfinder Mines Corporation, Shirley Basin Mine: To the best of Pathfinder Mines Corporation's knowledge, the construction of the tailings ponds and facilities was done in accordance with the permits and federal regulations in effect at the times of construction. Due to the completion of most site decommissioning, there are no current operations. However, an intermittent activity is the disposal of 11.e.(2) wastes from certain ISL licensees in the No. 3 pond area; that activity, to the best of Pathfinder Mines Corporations knowledge, is being conducted in accordance with all permits and federal regulations.

In-situ Leaching Facilities -

COGEMA Mining, Inc. Irigaray Mine and Christensen Ranch Satellite Facility: To the best of COGEMA Mining, Inc.'s

knowledge, the construction of the evaporation/holding ponds and facilities was done in accordance with the permits and federal regulations in effect at the times of construction. The ponds and facilities are being operated in accordance with all permits and federal regulations, to the best of COGEMA Mining, Inc.'s knowledge.

COGEMA Mining, Inc. Holiday-El Mesquite, O'Hern, and West Cole Facilities: To the best of COGEMA Mining, Inc.'s knowledge, the construction of the evaporation/holding ponds and facilities was done in accordance with the permits and federal regulations in effect at the times of construction. Most of the facilities and ponds at these sites have been decommissioned. Remaining facilities and ponds are being operated in accordance with all permits and federal regulations, to the best of COGEMA Mining, Inc.'s knowledge.

m) Description of any pollution control equipment:

Conventional Uranium Mill and Tailings Facilities –
Pathfinder Mines Corporation, Lucky Mc Mine: Due to the completion of site decommissioning, there is no pollution control equipment on site.

Pathfinder Mines Corporation, Shirley Basin Mine: All of the solid tailings ponds have been covered, including placement of the final radon barrier. The 11.e.(2) burial process involves using one open trench at a time for material placement with periodic earthen covering of the waste. The rest of the No. 3 pond basin has an interim earthen cover in place. There is no other pollution control equipment on site.

In-situ Leaching Facilities -
COGEMA Mining, Inc. Irigaray Mine and Christensen Ranch Satellite Facility: Pollution control equipment includes a scrubber on the uranium concentrate (yellowcake) dryer with a 95% to 99% efficiency for the removal of uranium particulates, a dust collection baghouse for the dried product packaging process, and the maintenance of a partial vacuum in the dryer enclosure to contain particulates. The operating permit from WDEQ specifies operating limits for scrubber pressure, scrubber liquid flow rate, and stack emissions. Other equipment consists of enclosed tanks to limit radon and other releases, curbed containment basins around tanks with retrieval sumps to control spills, alarm systems to detect pipeline pressure drops, indicative of a possible leak, and the routine maintenance of sufficient pond liquid levels to cover

bottom sediments in holding/evaporation ponds. Two permitted deep disposal wells are available for the disposal of process waste water.

COGEMA Mining, Inc. Holiday-El Mesquite, O'Hern, and West Cole Facilities: All processing plant facilities have been decommissioned, and there is no plant-related pollution control equipment left at the sites. There are two above ground storage tanks used in support of injection into a permitted deep disposal well at the Holiday-El Mesquite site. The Holiday-El Mesquite site is the only one where any of the holding/evaporation ponds are still present, and they have been cleaned out and only hold minor amounts of water from rainfall.

- n) Statement concerning applicability of NESHAP for radon emissions as defined under 40 CFR §§ 61.250 et. seq. (Subpart W):

Conventional Uranium Mill and Tailings Facilities –

Pathfinder Mines Corporation, Lucky Mc Mine: The radon-222 emission standard of 20 pCi/(m²-sec) is applicable to the site. The required annual testing of radon flux was conducted at the site until the site went into final closure. Subsequent to completion of the final radon barrier over the tailings ponds, a final radon flux test was conducted, demonstrating compliance with the radon emission standard. The site was not subject to the work practices due to the early construction and use of the ponds.

Pathfinder Mines Corporation, Shirley Basin Mine: The radon-222 emission standard of 20 pCi/(m²-sec) is applicable to the site. The required annual testing of radon flux was conducted at the site until the site went into final closure. Subsequent to completion of the final radon barrier over the solid tailings ponds, a final radon flux test was conducted, demonstrating compliance with the radon emission standard. The site was not subject to the work practices due to the early construction and use of the ponds.

In-situ Leaching Facilities -

COGEMA Mining, Inc. Irigaray Mine and Christensen Ranch Satellite Facility: The facilities are not subject to the NESHAP for radon emission under Subpart W since there are no tailings. While there are solution ponds that contain sediments, water levels are maintained over those sediments.

COGEMA Mining, Inc. Holiday-El Mesquite, O'Hern, and West Cole Facilities: The facilities are not subject to the NESHAP for radon emission under Subpart W since there are no tailings. Any

ponds structures left (Holiday-El Mesquite only) have been cleaned out and are no longer in use.

Information provided by: T. Hardgrove, R. Owens, L. Arbogast, D. Benevides

5. Results of all air and radon emission tests under 40 CFR §§ 61.253 and 61.255:
Conventional Uranium Mill and Tailings Facilities –

Pathfinder Mines Corporation, Lucky Mc Mine: See the enclosed radon flux test reports to EPA Region 8 along with supporting information, all in pdf format. The tests were conducted as specified in 40 CFR §§ 61.253 and 61.255. Also see the results and data for the radon flux test conducted on the final radon barrier as referenced earlier in this submittal. Also included are pdf files of emission reports to EPA under 40 CFR 61 Subpart I.

Pathfinder Mines Corporation, Shirley Basin Mine: : See the enclosed radon flux test reports to EPA Region 8 along with supporting information, all in pdf format. The tests were conducted as specified in 40 CFR §§ 61.253 and 61.255. Also see the results and data for the radon flux test conducted on the final radon barrier as referenced earlier in this submittal.

In-situ Leaching Facilities -

COGEMA Mining, Inc. Irigaray Mine and Christensen Ranch Satellite Facility: No radon flux tests were conducted for the reason stated in 4. n) above: there are no tailings on site.

COGEMA Mining, Inc. Holiday-El Mesquite, O'Hern, and West Cole Facilities: No radon flux tests were conducted for the reason stated in 4. n) above: there are no tailings on site.

Information provided by: T. Hardgrove

6. Provide copies of reports as specified in 40 CFR § 61.254:

Conventional Uranium Mill and Tailings Facilities –

Pathfinder Mines Corporation, Lucky Mc Mine and Shirley Basin Mine: No reports were generated pursuant to 40 CFR § 61.254 since either the sites were in compliance with the radon emission standard or were in final closure.

In-situ Leaching Facilities - Not applicable.

Information provided by: T. Hardgrove

Guide Relating Narrative to pdf Files on CD

<u>Narrative Section</u>	<u>Document</u>	<u>CD file</u>
4.c) Lucky Mc.....	Tailings Reclamation Completion Report.....	Lucky Mc Tailings Reclamation Completion Rpt VOL-I.pdf Lucky Mc Tailings Reclamation Completion Rpt VOL-II.pdf
	Lucky Mc Mill Site Completion Report.....	Lucky Mc_Mill_Site_Completion_Report.pdf
Shirley Basin.....	Tailings Reclamation Plan.....	Shirley Basin Tailings Reclamation Plan.pdf
	Shirley Basin Mill Site Completion Report For Reclamation of Off-Pile Windblown Area.....	XSBM_Windblown Tailings Cleanup Report.pdf
4.f) Lucky Mc	NRC Source Material License SUA-672.....	XSML_SUA-672.pdf
	Lucky Mc Application for ACLs.....	Lucky Mc ACL Application.pdf
	NRC Staff Environmental Assessment Of Lucky Mc ACLs Application.....	XLuckyMc_ACLEA.pdf
	Tailings Reclamation Plan.....	Lucky Mc Tailings Reclamation Plan Vol1.pdf Lucky Mc Tailings Reclamation Plan Vol2.pdf Lucky Mc Tailings Reclamation Plan Addendum I.pdf
	NRC License Approval of TRP.....	XLuckyMc_Tailings_Reclamation_Plan_NRC_Approvals.pdf XNRC approval IM Tailings Reclamation Plan Addend. I.pdf
	NRC Staff Environmental Assessment & Technical Evaluation for the TRP.....	XLuckyMc_Tailings_Reclamation_Plan_NRC_Approvals.pdf XNRC approval IM Tailings Reclamation Plan Addend. I.pdf
	Tailings Reclamation Completion Report.....	Lucky Mc Tailings Reclamation Completion Rpt VOL-I.pdf Lucky Mc Tailings Reclamation Completion Rpt VOL-II.pdf
	NRC Approval of TR Completion Report.....	XNRC_Approval_LM-Tailings_Reclamation_Completion-Rpt.pdf
	Lucky Mc Dose to Public Evaluations.....	XLuckyMc_40-CFR-190_Dose_to_Public.pdf
Shirley Basin.....	NRC Source Material License SUA-442.....	XShirley_Basin_Source_Material_License_SUA-442.pdf
	Shirley Basin Application for ACLs.....	Shirley Basin ACL Application.pdf
	NRC Staff Technical Evaluation for Shirley Basin ACLs.....	XShirley_Basin_NRC-Lic-Amendment_for_ACLS-TER.pdf
	Tailings Reclamation Plan.....	Shirley Basin Tailings Reclamation Plan.pdf

Guide Relating Narrative to pdf Files on CD

<u>Narrative Section</u>	<u>Narrative Section</u>	<u>Document</u>	<u>CD file</u>
Holiday- El Mesquite.		NRC License Approval of TRP.....	SBM TRP Approval.pdf XShirley_Basin_SUA-442_Amend.Approving_TRP_(with-TER).pdf
O'Hern.....		NRC Staff Technical Evaluation for the TRP	SBM TRP Approval.pdf XShirley_Basin_SUA-442_Amend.Approving_TRP_(with-TER).pdf
West Cole...		Final Radon Barrier Flux Test Summary.....	Shirley Basin Final Radon Barrier Flux Tests.pdf
4.g) Lucky Mc...		Laboratory Rn Flux Data.....	Shirley Basin Final Radon Barrier Flux Tests.pdf
		Map of Rn Flux Sampling Grid for Final Radon Barrier.....	S.B. Final Radon Flux Test Sample Locations-MAP.pdf
		Shirley Basin Dose to Public Evaluations.....	XShirley_Basin_Dose_to_Public_Eval_in_Lic.Renewal-EA.pdf
Irigaray.....	Irigaray.....	NRC Source Material License SUA-1341.....	September 30, 2008 NRC License Amendment Approval.pdf
		Wellfield Restoration Report.....	Irigaray_Wellfield_Restoration_Rpt.pdf
		Wellfield Restoration Approval by WDEQ...	2004_Irigaray_groundwater_restoration-WDEQ-Approval.pdf
		Wellfield Restoration Approval by NRC.....	2004_irigaray_groundwater_restoration_NRC_Approval.pdf
Christensen Ranch.....		Irigaray Dose to Public Evaluations.....	XIrigaray_Mine_Dose_to_Public.pdf
Holiday- El Mesquite.		Irigaray NPDES Permit.....	IR NPDES PERMIT.pdf IR NPDES PERMIT-1.pdf
		Irigaray Representative NPDES Discharge Reports.....	Irigaray and Christensen NPDES.pdf XIrigaray Christensen Ranch NPDES-2.pdf
4.i) Lucky Mc...	Christensen Ranch.....	Mine Permit & License Update (1996).....	XCurrent_Pemit_To_Mine_478.pdf
Shirley Basin		NRC Source Material License SUA-1341.....	September 30, 2008 NRC License Amendment Approval.pdf
Irigaray- Christensen Ranch.....		Wellfield Restoration Report.....	CR-2008_Wellfield_Restoration_Rpt.pdf
		Christensen Ranch Dose to Public Evaluations	XChristensen_Ranch_Dose_to_Public.pdf
		Christensen Ranch NPDES Permit.....	Irigaray and Christensen NPDES.pdf
		Christensen Ranch Representative NPDES Discharge Reports.....	Irigaray and Christensen NPDES.pdf XIrigaray Christensen Ranch NPDES-2.pdf
Texas ISL...			
4.j) Wyoming IS			
5. Lucky Mc...			