



State of Utah  
Department of  
Environmental Quality

Richard W. Sprott  
*Executive Director*

Division of Radiation Control  
Dane L. Finerfrock  
*Director*

JON M. HUNTSMAN, JR.  
*Governor*

GARY HERBERT  
*Lieutenant Governor*

July 29, 2008

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

Dear Mr. Roberts:

**SUBJECT: Denison Mines (USA) Corp. (DUSA)  
White Mesa Uranium Mill Cell 4A Operation  
Record of Telephone Conversations and Request for Information**

On July 28, 2008 Mr. David Rupp contacted you via telephone and discussed some of the major items needed for DRC operational approval of the subject Cell 4A at the White Mesa Uranium Mill. We anticipate identifying other needed minor items, which we will communicate later in writing. We also held a conference call with Mr. Ron Hochstein of DUSA on July 29, 2008 to discuss the major issues listed below.

The major items discussed with you on July 28 concerned the *Cell 4A BAT Monitoring, Operations and Maintenance Plan*, observed construction deficiencies, and the status of the surety update and the *Cell 4A Construction Quality Assurance Report*. In the review of these items, some new aspects pertaining to some of them have been identified, which were not discussed on July 28, but were mentioned to Mr. Hochstein on July 29. The items are listed below, divided according to the categories mentioned above:

**I. July 16, 2008 DUSA Cell 4A BAT Monitoring, Operations and Maintenance Plan:**

- a.) Detail drawings and procedures for the monitoring, operations and maintenance of the leak detection system (LDS) are needed. Similar details are also needed for the slimes drain system.
- b.) Some specific additional items:
  - 1.) The water elevation in the LDS sump for pump startup must not exceed 1-foot in depth below the lowest elevation of the secondary liner in the pond to conform to requirements of the Ground Water Discharge Permit [Part I.E.8(a)(2)].
  - 2.) The shut-off elevation of the pump in the LDS sump is currently specified as “at the lowest level possible.” Verbiage in the plan needs to include how that level will be established, and compliance made with the requirements of Part I.E.8(a)(2) of the permit.

3.) The Ground Water Discharge Permit [Parts I.E.8(a)(1) and I.F.3] requires that continuous monitoring of the sump water elevation is provided, and certain other measurements be recorded. Drawings and adjustments to the plan text need to be made to incorporate these requirements.

**II. Observed Construction Deficiencies:**

As discussed, the items in this category will need to be certified as completed by a registered professional engineer licensed to practice in the state of Utah. As you proposed, photographs documenting the work will need to be submitted for approval.

- a.) Sandbag Cover over the Strip-drains:
  - 1.) Sandbags which expose the strip-drain need to be adjusted to cover the same at all locations.
  - 2.) The exposed strip-drains at their junctions with the slimes drain header need to be properly covered with sandbags.
  - 3.) Sandbags need to be extended onto the slimes drain header windrow to cover and be in alignment above the slimes drain sections that are installed within the slimes drain header envelope of geotextile and gravel drain rock. See attached DRC sketch dated July 25, 2008.
  
- b.) A section of non-woven geotextile material, about 25-feet in length, has been installed as the top fabric at the upper end of slimes drain header near the northeast corner of the cell. This material needs to be replaced with woven geotextile material to meet the specifications.
  
- c.) Drainage Rock for the Slimes Drain Header (Spine or Central Collection Pipe):
  - 1.) Drainage rock outside the geotextile envelope and on the cell liner needs to be removed.
  - 2.) In numerous locations, drainage rock in the header is exposed, yet cupped in the geo-fabrics of the slimes drain header (per attached photographs). This configuration does not conform to the original design drawings. A new aspect on this problem, not discussed with you on July 28, is that these openings to the drain rock will allow fines to flow into the slimes drain header, and plug or reduce the permeability of the slimes drain. Please change this configuration to conform to the original design, or propose an approvable remedy to eliminate the drain rock exposure to the tailings.
  
- d.) The overflow spillway between cells 3 and 4A is shown on the project drawings, sheet seven. Section J-7 shows the inflow and outflow edges as beveled and flush to the liner surface. However, these edges are not constructed beveled. A new aspect not mentioned earlier, is that the slab is also perched higher (6"-12") above the liner surface, than the original design on the Cell 4A side. Please change this configuration to conform to the original design, propose an approvable remedy to the configuration or demonstrate that the existing condition will not be a hazard to the Cell 4A liner.

**III. July 25, 2008 Revised Surety Update:**

On July 28, 2008 we received a revised surety update from DUSA including the reclamation and decommissioning of Cell 4A. This item is currently under review. A delivered surety

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bond or other instrument corresponding to the final approved amount must be received before approval to use will be issued.

IV. **Cell 4A Construction Quality Assurance Report:**

Our comments regarding the report are listed on our letter of July 22, 2008, which was hand-delivered to you on July 23, 2008. DUSA's response and resolution to items 1-4 in that letter are considered major items for DRC operational approval.

Please review the above comments, and submit the requested information. If you have any questions on the above, please contact me or Mr. Rupp.

Sincerely,



Dane L. Finerfrock  
Director

DAR:dr

Cc: Mr. Ron Hochstein, President, DUSA

Enclosures: Photographs 2, 5, 6, 7, 8, 12, and 13


M


DRC

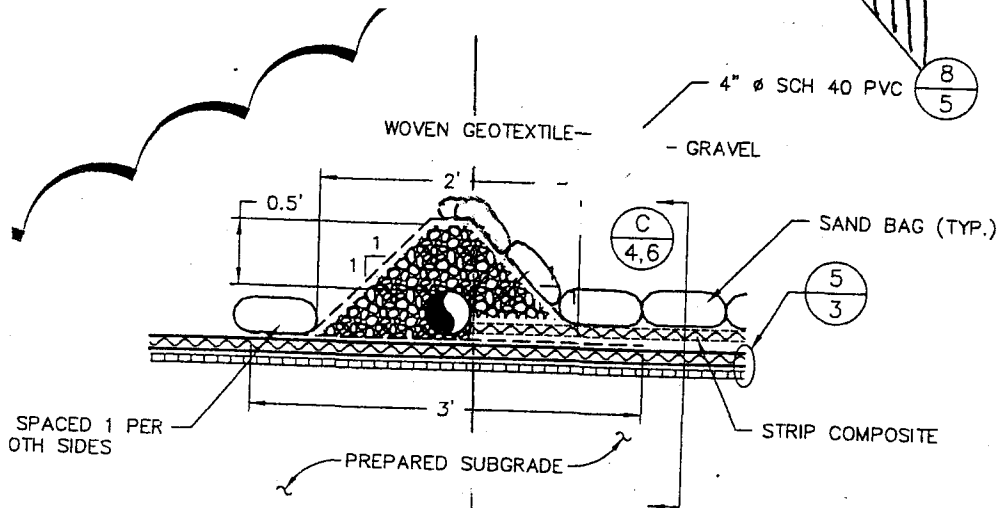
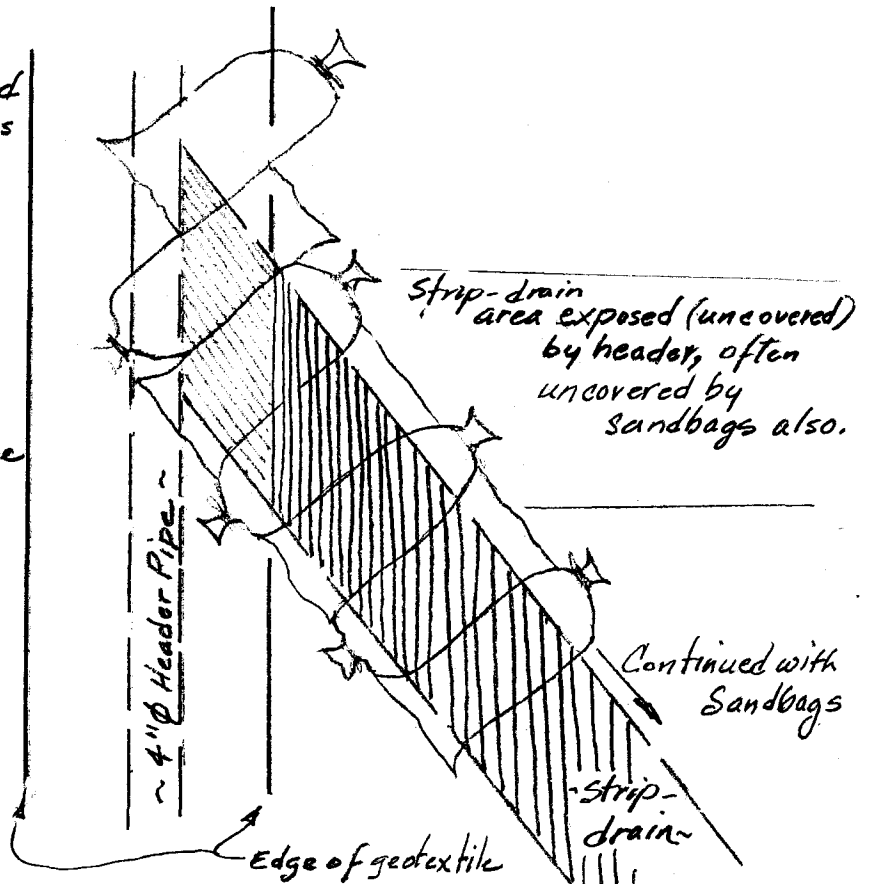
DUSA Cell 4A

July 25, 2008

1/1

 Strip-drain  
Area currently to be covered  
by sandbags for filter as  
req'd by specs.

 strip-drain area  
to be covered by sand-  
bags and header envelope



**B**  
4,6 SECTION  
SLIMES DRAIN HEADER  
SCALE: 1" = 1'

STAEDTLER®  
No. 937 811E  
Engineer's Computation Pad

Enclosure