Proposed Changes to the Dewey Burdock Underground Injection Control (UIC) Draft Permit Documents (Re-issued August 26, 2019)

Class III Draft UIC Area Permit

2017 Class III Draft Permit	2019 Class III Draft Permit	Supporting Document Reference (if applicable)
PART II. WELLFIELD DELINEATION AND PUMP TESTING REQUIREMENTS; AUTHORIZATION TO COMMENCE INJECTION **A. Wellfield Location Restrictions** 1,600-foot buffer zone: where no injection or production wells would be installed within 1,600 feet of the Project Area Boundary	**Changed to** **PART II. WELLFIELD DELINEATION AND PUMP TESTING REQUIREMENTS; AUTHORIZATION TO COMMENCE INJECTION** **B. Wellfield Location Restrictions** 1,000-foot buffer zone: where no injection or production wells would be installed within 1,000 feet of the Project Area Boundary	**2019 Class III Fact Sheet** **Section 7.1 Wellfield Design** p. 78
	PART II. WELLFIELD DELINEATION AND PUMP TESTING REQUIREMENTS; AUTHORIZATION TO COMMENCE INJECTION **B. Drilling and Logging of Wellfield Delineation Drillholes and Pump Testing Wells** 1. Wellfield Delineation Drilling d. new requirement to address the flexibility of the aquifer exemption boundary	Proposed **EPA Dewey-Burdock Aquifer Exemption Record of Decision August 2019** **Description of Proposed AE,** p. 2-3
PART II. WELLFIELD DELINEATION AND PUMP TESTING REQUIREMENTS; AUTHORIZATION TO COMMENCE INJECTION **Section D. Design and Construction of Wellfield Monitoring Well System** 4.e. Down-gradient Compliance Boundary Wells **Removed**	**Replaced with** **PART IV. REQUIREMENTS FOR DEVELOPMENT OF A CONCEPTUAL SITE MODEL AND A REACTIVE TRANSPORT GEOCHEMICAL MODEL**	**2019 Class III Fact Sheet** **Section 15.2**, p. 12 **Section 15.3**, p. 125

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PART II. WELLFIELD DELINEATION AND PUMP TESTING REQUIREMENTS; AUTHORIZATION TO COMMENCE INJECTION **Section D. Design and Construction of Wellfield Monitoring Well System** 5. Injection Zone Core Sample Collection from Monitoring Wells Located Down-gradient of Wellfields **Removed**	**Replaced with** **PART IV. REQUIREMENTS FOR DEVELOPMENT OF A CONCEPTUAL SITE MODEL AND A REACTIVE TRANSPORT GEOCHEMICAL MODEL** **A. Development of a Conceptual Site Model** 1.c. Geochemical Characteristics **C. Monitoring, Laboratory Testing, and Field Investigations to Calibrate the Geochemical Model with Site-Specific Data** 2. Laboratory Testing	**2019 Class III Fact Sheet** **Section 15.0** geological and geochemical characterization requirements
PART II. WELLFIELD DELINEATION AND PUMP TESTING REQUIREMENTS; AUTHORIZATION TO COMMENCE INJECTION **E. Formation Testing** 2.b Sampling and Analysis of Injection Interval and Non-injection Interval Monitoring Wells **Table 7.** Field Parameters to be Monitored and Stabilization Criteria to Meet before Sample Collection	**PART II. WELLFIELD DELINEATION AND PUMP TESTING REQUIREMENTS; AUTHORIZATION TO COMMENCE INJECTION** **E. Formation Testing** Updates to 2.b Sampling and Analysis of Injection Interval and Non-injection Interval Monitoring Wells **Table 7.** Field Parameters to be Monitored and Stabilization Criteria to Meet before Sample Collection consistent with NRC license requirements	**2019 Class III Fact Sheet** **Section 5.3.2 Water Quality Analyses**
PART II. WELLFIELD DELINEATION AND PUMP TESTING REQUIREMENTS; AUTHORIZATION TO COMMENCE INJECTION **E. Formation Testing** **Table 8**. Baseline Water Quality Parameter List	**PART II. WELLFIELD DELINEATION AND PUMP TESTING REQUIREMENTS; AUTHORIZATION TO COMMENCE INJECTION** **E. Formation Testing** **Table 8** updated Additon of Specific gravity and turbidity Changed total metals analyses to dissolved metals analyses in order to be appropriate for geochemical modeling input Radium 228 added to be consistent with the drinking water standard	

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	PART II. WELLFIELD DELINEATION AND PUMP TESTING REQUIREMENTS; AUTHORIZATION TO COMMENCE INJECTION **E. Formation Testing** Updates to **Table 8**, continued Removed Aluminum, Antimony, Beryllium, Strontium, Thallium, Thorium, Lead 210 and Polonium 210 consistent with the NRC list of baseline analytes Footnote added to exclude radon and uranium Adjusted Gross Alpha to be consistent with the analysis for the drinking water standard	
PART II. WELLFIELD DELINEATION AND PUMP TESTING REQUIREMENTS; AUTHORIZATION TO COMMENCE INJECTION **I. Evaluation of the Injection Authorization Data Package Reports for Authorization to Commence Injection** 4. Information to Submit to the Director to Obtain Authorization to Commence Injection b. Step Rate Tests Results **Table 9**. Step Rate Tests to be Performed to Determine Fracture Gradient for the Determination of MAIP	**PART II. WELLFIELD DELINEATION AND PUMP TESTING REQUIREMENTS; AUTHORIZATION TO COMMENCE INJECTION** **I. Evaluation of the Injection Authorization Data Package Reports for Authorization to Commence Injection** **Table 9** updated to remove specific locations for conducting the step rate tests. Figure 3 and 4 which showed the specific locations were removed. **H. Injection Authorization Data Package Reports**, 3.u. requires the Permittee to include the proposed locations for Step Rate Test.	**2019 Class III Fact Sheet** **5.8.1 Step Rate Test Locations** p. 71
PART IV. DOWN-GRADIENT COMPLIANCE BOUNDARY BASELINE MONITORING AND POST-RESTORATION MONITORING PLAN **Removed**	**Replaced with** **PART IV. REQUIREMENTS FOR DEVELOPMENT OF A CONCEPTUAL SITE MODEL AND A REACTIVE TRANSPORT GEOCHEMICAL MODEL**	**2019 Class III Fact Sheet** Discussed in **Section 15** beginning on p. 123

2017 Class III Draft Permit	2019 Class III Draft Permit	Supporting Document Reference (if applicable)
PART V. WELL AND WELLFIELD CONSTRUCTION REQUIREMENTS **A. Approved Well Construction Plan**	**PART V. WELL AND WELLFIELD CONSTRUCTION REQUIREMENTS** **A. Approved Well Construction Plan** **Figure 3. Options for Well Construction Designs** An open-hole completion for Class III wells is now an approved option for well construction	**2019 Class III Fact Sheet** **Section 7.3 Well Construction Procedures** p. 81
PART V. WELL AND WELLFIELD CONSTRUCTION REQUIREMENTS **H. Postponement of Construction** Requirement to begin construction within one year of the permit effective date has been removed.	**PART V. WELL AND WELLFIELD CONSTRUCTION REQUIREMENTS** **H. Postponement of Construction** Now requires an annual Area of Review updated	**2019 Class III Fact Sheet** **Section 7.11 Postponement of Construction** p. 89
PART V. WELL AND WELLFIELD CONSTRUCTION REQUIREMENTS **I. Additional Required Equipment for Manifold Monitoring** 1. Demonstration that Manifold Monitoring Is Equivalent to Individual Well Monitoring	**PART V. WELL AND WELLFIELD CONSTRUCTION REQUIREMENTS** **I. Additional Requirements for Manifold Monitoring** 1. Demonstration that Manifold Monitoring Is Equivalent to Individual Well Monitoring Updated to require a bounding analysis to demonstrate that injection pressure at the manifold Is equivalent to the injection pressure at individual well heads as requirement b. A description for how the bounding analysis will be performed is included under **PART IX. MONITORING, RECORDING AND REPORTING OF RESULTS,** **E. Reporting Requirements** 5. Demonstration that Manifold Monitoring of Injection Pressure is Comparable to Wellhead Monitoring	**2019 Class III Fact Sheet** **Section 7.10.3 Wellhead Monitoring Equipment** p. 87
PART V. WELL AND WELLFIELD CONSTRUCTION REQUIREMENTS **I. Additional Required Equipment for Manifold Monitoring**	**PART V. WELL AND WELLFIELD CONSTRUCTION REQUIREMENTS** **J. Wellfield Monitoring** Now contains requirements formerly under Part V, Section I.2.e.iv and Section 3. b and allows the Permittee	**2019 Class III Fact Sheet** **Section 12.2 Injection and Production Flow Rate and Volume** **Section 12.3 Injection Fluid Monitoring**

2017 Class III Draft Permit	2019 Class III Draft Permit	Supporting Document Reference (if applicable)
2. The installation of following additional equipment is required for manifold monitoring: Requirement e.iv was duplicative of 3. Wellhead and Surface Equipment, requirement b	flexibility in where to locate that monitoring equipment as long as the location provides representative samples per 40 CFR §144.51(j)(1). **H. Injection Authorization Data Package Reports**, 4 requires the Permittee to include information about where this monitoring equipment is located.	p. 104 **Section 12.5.5.1 Monitoring of Injection and Production Flow Rates** p. 113
PART VIII. WELL OPERATION **H. Injection Fluid Limitation**, requirement 3	**PART VIII. WELL OPERATION** **H. Injection Fluid Limitation**, requirement 3 has been updated to allow injection of a chemical reductant during groundwater restoration	**2019 Class III Fact Sheet** **Section 9.4.1 Injection Fluid Composition** p. 98
PART IX. MONITORING, RECORDING AND REPORTING OF RESULTS, **B. Monitoring Parameters, Frequency, Records and Reports** 3. Down-gradient Compliance Boundary Baseline Monitoring	**Removed**	This requirement is no longer needed now that Down-gradient Compliance Boundary Wells are no longer required.
PART IX. MONITORING, RECORDING AND REPORTING OF RESULTS, **B. Monitoring Parameters, Frequency, Records and Reports** **Table 14.** Monitoring Parameters and Frequency I. SIX MONTH INTERVAL POST-RESTORATION GROUNDWATER MONITORING	**Removed**	This portion of Table 14 was removed because Post-Restoration Groundwater Monitoring is no longer required.
PART IX. MONITORING, RECORDING AND REPORTING OF RESULTS, **C. Excursion Monitoring** 4. Additional Monitoring of an Expanding Excursion Plume Installation of additional down-gradient monitoring wells	Updated to **PART IX. MONITORING, RECORDING AND REPORTING OF RESULTS,** **C. Excursion Monitoring** 4. During a Confirmed Excursion Event f. Additional Requirements for Expanding Excursion Plumes and 5. Geochemical Modeling for Expanding Excursion Plumes	**2019 Class III Fact Sheet** **Section 12.5.6.2 Monitoring of an Excursion in a Non-Injection Interval** **Section 12.5.7 Geochemical Modeling of an Expanding Injection Interval Excursion Plume** p. 116

2017 Class III Draft Permit	2019 Class III Draft Permit	Supporting Document Reference (if applicable)
PART IX. MONITORING, RECORDING AND REPORTING OF RESULTS, **E. Post-Restoration Groundwater Monitoring Requirements**	**Removed**	These monitoring requirements were removed because Post-Restoration Groundwater Monitoring is no longer required.
PART XIII. FINANCIAL RESPONSIBILITY	**PART XIII. FINANCIAL RESPONSIBILITY**	**17.0 FINANCIAL RESPONSIBILITY** p. 129 Updated consistent with UIC regulations and to require the Permittee to demonstrate financial responsibility to cover the plugging of Class III wells in the first wellfield before any final permit decision is made.

Class V Draft UIC Area Permit

2019 Class V Draft Permit	Change	Supporting Document Reference (if applicable)
Throughout	Eliminated the option for drilling injection wells to the Deadwood Formation,	**2019 Class V Fact Sheet** **2.0. GENERAL INFORMATION AND DESCRIPTION OF FACILITY** p. 7 **2.1 Injection Well Classification** p. 8
Throughout	Construction of the Madison water supply wells is now optional. The permit does, however, still contain requirements for construction, logging, and testing of these wells if they are constructed.	**2019 Class V Fact Sheet Sections** 3.3.2, p. 17 3.3.3, p.18 4.4.4, p. 30 5.1, p. 31 Table 10, p. 32 5.2, p. 32 5.3.1, p. 33 Table 12, p. 33 5.3.3, p. 33 Table 13, p. 34 5.6, p. 38 Table 15, p. 38-39
PART II. REQUIREMENTS FOR AUTHORIZATION TO COMMENCE INJECTION **B. Collection of Drill Core in the Injection Zone and Confining Zones**	New requirement 2. The Permittee shall compare geologic logs from the first well with subsequent wells to demonstrate consistency and continuity of the geologic intervals.	**3.3.1 The Upper Confining Zone for Minnelusa Injection Zone**, p. 16
PART II. REQUIREMENTS FOR AUTHORIZATION TO COMMENCE INJECTION **B. Collection of Drill Core in the Injection Zone and Confining Zones** **Table 2**. Drill Core Collection for Laboratory Testing And **E. Evaluation of Confining Zones** 2. Core Sample Collection from Confining Zones	• Eliminated injection well coring in the lower confining zone since these wells will not penetrate that interval. • Now requires core samples from each discrete injection interval. • No longer specifies intervals in the confining zone for core collection and does not specify how much core to collect. • Requires core from the upper confining zone of only within the first injection well constructed	**2019 Class V Fact Sheet** **3.3.1 The Upper Confining Zone for Minnelusa Injection Zone**, p. 16 **5.1 Collection of Drill Core in the Injection Zone and Confining Zones**, p. 31

2019 Class V Draft Permit	Change	Supporting Document Reference (if applicable)
		Table 10. Drill Core Collection for Laboratory Testing, p. 32
PART II. REQUIREMENTS FOR AUTHORIZATION TO COMMENCE INJECTION **D. Formation Testing** **Table 6.** Aquifer to be Tested	• Now requires each discrete Minnelusa interval correlating to the perforated intervals in the injection wells to be tested for TDS to determine if each injection interval is an underground source of drinking water (USDW). • Requires no other aquifers to be tested, because the Sundance and overlying aquifers have already been characterized in the Class III permit application and will be further characterized under the Class III Draft Area Permit. • There is no need to test the Minnekahta to determine if it is a USDW, because it will be protected by cement behind casing as if it is a USDW.	**2019 Class V Fact Sheet** **5.3 Formation Testing** **5.3.1 Potentiometric Surface Testing and Total Dissolved Solids (TDS) Analysis of Aquifers including Injection Zone**, p. 32 **Table 12. Aquifers to be Isolated and Tested in Each Well Drillhole**, p. 33
PART II. REQUIREMENTS FOR AUTHORIZATION TO COMMENCE INJECTION **D. Formation Testing** **Table 7.** Formation Testing Program	Distinction is now made between open-hole and cased-hole testing and sampling	**2019 Class V Fact Sheet** **5.3.2 Demonstration that the Injection Zone Is Not a USDW**, p. 33
PART II. REQUIREMENTS FOR AUTHORIZATION TO COMMENCE INJECTION **D. Formation Testing** 2. Aquifer Fluid Sampling Requirements	Distinction is made between open-hole and cased-hole sampling. • The use of fluorescent dye additive to the drilling fluid is specified to confirm that formation samples are free of drilling filtrate. • Open hole sampling procedures modified • For each injection well, added a requirement for swab samples to be collected from each separate perforated interval in order to determine TDS in the injection zone. • Injection zone characterization is required to be made for each separate injection interval.	**2019 Class V Fact Sheet** **5.3 Formation Testing** **5.3.1 Potentiometric Surface Testing and Total Dissolved Solids (TDS) Analysis of Aquifers including Injection Zone**, p. 32 **5.3.2 Demonstration that the Injection Zone Is Not a USDW**, p. 33 **5.3.3 Aquifer Characterization**, p. 33

2019 Class V Draft Permit	Change	Supporting Document Reference (if applicable)
PART I. EFFECT OF PERMIT **Table 1.** Injection Wells Proposed under the Class V Area Permit and **PART II. REQUIREMENTS FOR AUTHORIZATION TO COMMENCE INJECTION** **E. Evaluation of Confining Zones** **Table 9.** Depths to Confining Zones for the Minnelusa Injection Zone in the Dewey and Burdock Areas **1. Determination of Actual Depth and Thickness of Confining Zones**	Total depth of injection wells now set to remain above the lower confining zone Minnelusa injection zone	**2019 Class V Fact Sheet** **Section 3.3.2 The Lower Confining Zone for Minnelusa Injection Zone**, p. 17
PART III. WELL CONSTRUCTION REQUIREMENTS **B. Approved Well Construction Plans** **Table 11. Well Casing and Cement Summary**	Construction plan DW No. 1 for drilling down to the Deadwood Formation removed. Long string casing size modified to allow the use of 7" or 5-1/2" casing. Surface casing 50 feet below Sundance Formation and fully cemented to surface. Long string casing cemented to surface.	**2019 Class V Fact Sheet** **6.1 Casing and Cementing (40 CFR § 147.2104 (d))**, p. 40 **Table 16. Well Casing and Cement Summary**, p. 41
PART III. WELL CONSTRUCTION REQUIREMENTS **B. Approved Well Construction Plans** **Figures 3 and 4**	Updated wellbore schematics	
PART III. WELL CONSTRUCTION REQUIREMENTS **L. Well Stimulation, Workovers and Alterations**	Updated to clarify that alteration, workover, and well stimulation include any activity that physically changes the well construction (casing, tubing, and packer) or injection formation.	
PART IV. WELL OPERATION **E. Requirements if the Injection Zone is an USDW**	Updated to specify if any Minnelusa interval is determined to be a USDW based on testing, the Permittee would need to obtain an aquifer exemption and a major permit modification according to the requirements of 40 CFR § 144.39 and § 124.5 in order to inject into the Minnelusa formation.	**2019 Class V Fact Sheet** **8.1.4 Monitoring of Well Operating Parameters**, p. 54

2019 Class V Draft Permit	Change	Supporting Document Reference (if applicable)
PART IV. WELL OPERATION **K. Approved Injectate**	Injection fluid is limited to waste fluids from the ISR process generated by the Dewey-Burdock Project.	**2019 Class V Fact Sheet** **7.8 Approved Injectate and Injectate Permit Limits**, p. 47
PART VI. PLUGGING AND ABANDONMENT (P&A)	Eliminated the prohibition from P&A until Class III decommissioning	
PART VIII. FINANCIAL RESPONSIBILITY	Has been updated to require the Permittee to demonstrate financial responsibility before the final permit decision is made.	**2019 Class V Fact Sheet** **10.3 Timing for Demonstration of Financial Responsibility**, p.53
Appendix A **Proposed Schematic Diagrams of the Wellhead and Surface Facilities**	Updated wellhead schematic	

Changes to both Class III and Class V Draft Area Permits

2019 Class III and Class V Draft Area Permits	Changes
Class III Draft Area Permit PART V. WELL AND WELLFIELD CONSTRUCTION REQUIREMENTS H. Postponement of Construction **Class V Draft Area Permit** PART III. WELL CONSTRUCTION REQUIREMENTS K. Postponement of Construction	Requirement to begin construction within one year of the permit effective date has been removed. Draft Permits now require an annual Area of Review update as discussed in the Class III Fact Sheet, Section 7.11 Postponement of Construction, p. 89
Class III Draft Area Permit PART IX. MONITORING, RECORDING AND REPORTING OF RESULTS, Section D. Seismic Activity Monitoring **Class III Fact Sheet** Section 12.8 Seismic Activity Monitoring p. 118 **Class V Draft Area Permit** PART V. MONITORING, RECORDKEEPING, AND REPORTING OF RESULTS B. Seismicity **Class V Fact Sheet** Section 8.1.2.2 Seismic Monitoring Requirements	*The Permittee shall notify the EPA within twenty-four (24) hours of any detectible seismic event reported within two miles of the permit boundary* Changed to: *The Permittee shall notify the Director within twenty-four (24) hours of any seismic event measuring 4.0 magnitude (MMI scale) or greater reported within two miles of the permit boundary* *The Permittee shall record any seismic event occurring within fifty miles of the permit boundary and report such events to EPA on a quarterly basis* Changed to: *The Permittee shall record any seismic event measuring 2.0 magnitude (MMI scale) or greater occurring within fifty miles of the permit boundary and report such events to EPA on a quarterly basis.*
Class III Draft Area Permit **PART XIV. COMPLIANCE WITH APPLICABLE FEDERAL LAWS** **A. The National Historic Preservation Act (NHPA) of 1966, 16 U.S.C. 470 et seq**. **Class III Fact Sheet** **Section 18.1 The National Historic Preservation Act, p. 131**	**Added Mitigation Measures for Compliance with the National Historic Preservation Act**

2019 Class III and Class V Draft Area Permits	Changes
Class V Draft Area Permit **PART IX. COMPLIANCE WITH APPLICABLE FEDERAL LAWS** **A. The National Historic Preservation Act (NHPA) of 1966, 16 U.S.C. 470 et seq.** **Class V Fact Sheet** **Section 11.1 The National Historic Preservation Act**	**Added Mitigation Measures for Compliance with the National Historic Preservation Act**
Class III Draft Area Permit **PART XIV. COMPLIANCE WITH APPLICABLE FEDERAL LAWS** **B. The Endangered Species Act (ESA), 16 U.S.C. 1531 et seq.** **Class III Fact Sheet** **18.2 The Endangered Species Act, p. 131** **Class V Draft Area Permit** **PART IX. COMPLIANCE WITH APPLICABLE FEDERAL LAWS** **B. The Endangered Species Act (ESA), 16 U.S.C. 1531 et seq.** **Class V Fact Sheet** **11.2 The Endangered Species Act**	**Added Mitigation Measures for Compliance with the Endangered Species Act** Also see Biological Assessment document and letter from the US Fish and Wildlife Service

Changes to the Proposed Aquifer Exemption (AE) Draft Record of Decision (ROD)

Section and page numbers	Explanation of Change
Description of proposed AE boundary location Figures 2 and 3, pages 3-4	Clarifies flexibility in the AE boundary location once the horizontal extent of the ore deposits is determined. The AE boundary is still 120 feet from the wellfield perimeter monitoring well ring; however, the location of the perimeter monitoring well ring, and subsequently the AE boundary, may shift outwards after delineation drilling determines the horizontal extent of the ore deposits. This is the same approach as proposed in first draft ROD; the flexibility concept is now clarified. The AE boundary will not move further than the ¼ mile buffer measured from the current extent of the ore deposits shown in Figure 3. In most cases, the AE boundary is expected to be less than the ¼ mile boundary. This approach results in exempting only the area needed for uranium ISR compared with using a fixed ¼ mile boundary.
Three Options for AE Approval pages 11-12	Added a third option for approving the exemption of Burdock Wellfields 6 and 7 where well 16 is located. **Option 3** allows Powertech to submit a South Dakota Water Well Completion Report to classify well 16 as a monitoring well and attach documentation stating that well 16 should not be used for human consumption because the groundwater produced from the well exceeds the primary drinking water standards for radium and gross alpha and radon levels are high enough that indoor use should be avoided.

Changes to the Environmental Justice Analysis

New Sections and page numbers	Summary of Changes
7.0 The Black Hills, p. 26 7.1 Tribal Consultations, p. 26 7.2 The Fort Laramie Treaties, p. 27 7.3 Expansion of Geographic Scope of Environmental Justice Analysis, p. 31 7.4 Historic Mining Activities in the Black Hills, p. 33 7.5 Ethnographic Information on Sacred Sites and the Black Hills, p. 39 7.6 Comments Received on the Black Hills as a Sacred Site, p. 41 7.7 Proposed SDWA Actions and Tribal Interests in the Black Hills, p.43 7.8 EPA Discretion to Address Environmental Justice Concerns	Based on the Tribal consultation discussions as well as comments received during the public hearings and public comment period, the EPA expanded the EJ analysis to examine the proximity of the proposed project to the Black Hills as a sacred site, an issue identified on the 2017 draft EJ Analysis as important to Tribes historically and presently. This revised draft EJ analysis includes additional information on various treaties. These new sections are included in Sections 7.0 – 7.8.
8.0 Conclusions	The EPA has updated conclusions based on the additional analysis performed.

Changes to the 2019 National Historic Preservation Act Compliance (NHPA) Document August

The NHPA compliance document section entitled *Identification of Historic Properties (36 CFR §§ 800.4(a), (b), (c))* was updated consistent with the Nuclear Regulatory Commission staff activities since the 2017 draft and referenced that mitigation measures were included in the updated Class III and Class V Draft Area Permits.

Changes to the Cumulative Effects Analysis (CEA) Document

The EPA made minimal changes to the CEA consistent with the changes in the updated Class III Draft Area Permit.