

**Grand County**  
**Annual Statement of Continued Compliance**  
**July 19, 2021 – July 18, 2022**

**I. Per requirements of the Grand County Conditional Use Permit (CUP), Resolution #2006-2741, DOE submits this Annual Statement of Continued Compliance. The following is specific information requested in item #17 of the resolution:**

**a. Summary of work completed by the Moab Uranium Mill Tailings Remedial Action Project (Project) pursuant to the approved CUP in the past 12 months:**

**Project Accomplishments**

During the reporting period, the Project shipped approximately 990,000 tons of uranium mill tailings. To date, the Project has shipped more than 12.74 million tons, or about 80 percent of the total estimated 16 million tons to be moved.

In March 2022, the U.S. Congress approved the Fiscal Year (FY) 2022 budget. It provided \$67 million to the Project, which was a \$19.1 million increase over the FY 2021 budget.

In September 2021, the Project reached 12 million tons of mill tailings shipped Moab to Crescent Junction.

The Project has continued to stay operational throughout the Covid-19 pandemic. Management implemented the Federal Government's Safer Federal Workforce Taskforce guidelines for safe operations which aligned with Centers for Disease Control's (CDC) COVID-19 Prevention guidance. The Moab project continues to adapt its COVID-19 practices to maintain compliance with the everchanging pandemic community conditions. Community conditions are updated weekly by the CDC (<https://www.cdc.gov/coronavirus/2019-ncov/your-health/covid-by-county.html>).

**Moab**

Tailings excavation, conditioning, loading, and unloading were performed throughout the year. The Project continued the four trains a week shipping schedule for the duration of the reporting period.

More than 6.0 million gallons of groundwater were extracted during the past 12 months, removing 12,400 pounds of ammonia and 121 pounds of uranium, through the interim action groundwater system. The extraction system was shut down from early-November 2021 through March 2022 as there is minimal evaporation during the winter months and the existing storage capacity for contaminated water is limited. More than 7.8 million gallons of freshwater were injected to create a hydraulic barrier.

Because of the below average Colorado River flows in spring 2022, no areas of the site flooded.

Revegetation efforts in the off-pile areas continue to progress, with staff working toward restoring Project lands to a more sustainable native ecosystem. The U.S. Geological Survey (USGS) experimental plots are still active, with USGS staff and Project staff coordinating work and sharing resulting data. Two biocrust salvages and one plant salvage from off-site locations were successfully executed, providing the Project with more native soil and vegetation to promote biodiversity and potentially stabilize Project soils to help minimize dust production. Staff developed and planted a custom native grass seed mix and was also awarded a separate specialty native seed mix from a Watershed Restoration Initiative (WRI) grant. A collaborative weed control endeavor involving Project staff and the State of Utah Division of Natural Resources removed invasive Tamarisk stands and will help prevent encroaching Russian knapweed from accessing the southern site boundary.

### **Crescent Junction**

Tailings placement and compaction in the disposal cell continued throughout the last 12 months.

Maintenance activities were performed at the Crescent Junction site in addition to a pump installation at Green River. The new river pump has been ordered and will replace the aging river pump that pumps water from the Green River to the settling pond at the Green River site.

The Project is considering a new disposal cell cover design, which would result in improved performance and reduced construction costs. During the reporting period, the remedial action contractor completed the 60% design and began work on the 90% design for an evapotranspiration cover. Evapotranspiration covers are composed of rock and soil and topped with vegetation.

**b. Number of workers employed onsite in the past year and projection for the coming year:**

As of July 2022, the Project employed 134 people. Staffing will continue to reflect the shipping schedule.

**c. The work plan for the coming 12 months including any modifications, additions, and deletions:**

The Project plans to continue excavating and conditioning mill tailings, and shipping four trains per week through the end of this FY on September 30, 2022. The shipping schedule will remain the same through the next 12 months with the potential for Friday, Saturday and Sunday shipments as opportunities arise.

Placement of tailings four days per week will continue at the Crescent Junction site for the foreseeable future. The Project has been placing interim covers on tailings that have reached final design elevation in the disposal cell.

The Department of Energy (DOE) awarded the closure remedial action contract March 2, 2022 to NorthWind Portage, the incumbent. The current technical assistance contract expires in September 2022. The procurement process for the technical assistance contract has begun and is scheduled to be award by October 1, 2022.

Operation of the interim groundwater remedial action system will continue, including groundwater extraction, freshwater injection, and surface water diversion (when necessary), along with system monitoring.

**d. Air and water quality monitoring reports and support materials sufficient to inform the public regarding any health risks associated with the Project:**

The Project prepares an Annual Site Environmental Report to inform the public of the environmental site conditions, document compliance with environmental standards and requirements, and highlight significant programs and efforts. A comprehensive network of more than 100 groundwater wells and surface water monitoring locations and 27 environmental air monitoring stations are situated on and off the Project sites. Groundwater and surface water monitoring reports, quarterly air monitoring data reports, and the Annual Site Environmental Reports are readily available on the Project website at [www.gjem.energy.gov/](http://www.gjem.energy.gov/). In addition, copies are maintained in the public reading room at the Grand County Public Library and key stakeholders are notified of their availability on the Project website.

**Air**

The Project monitors public exposure to contaminants, including direct gamma radiation, radon, and airborne radioparticulates, which are directly attributable to the uranium mill tailings and other contaminated materials from the Moab and Crescent Junction sites. Monitoring locations are shown on maps included in the quarterly air monitoring reports. Public exposure to direct gamma radiation and radioparticulates from the Project sites did not exceed DOE public dose limits during the most recent four-quarter period (October-December 2021). Based on the available data, the radon exposure to the maximally exposed individual was below the DOE limit.

During the reporting period, the Project continued its review of the environmental air monitoring network program. The review resulted in recommended changes which were presented to the Moab Tailings Project Steering Committee in January 2021. A committee reviewed the proposed changes to ensure full compliance with the applicable DOE Order and continued protection of the public. DOE approved the changes and those have been implemented since January 2022.

**Employee Radiological Monitoring**

The Project conducts a separate employee radiological monitoring program. Employees who routinely enter the Radiological Contamination Area represent the highest potentially exposed individuals. They are monitored for their radiation exposure, known

as total effective dose, from gamma radiation, radon, and radioparticulates. DOE has a total effective dose limit of 5,000 millirems per year (mrem/yr) and an administrative control level of 2,000 mrem/yr. The Project sets its own goal and ensures engineering and administrative controls are in place to maintain employee radiological dose as low as reasonably achievable (ALARA). Radiation exposure results to date indicate that the Project has adequately protected its workers from radiological hazards by keeping the total effective dose well below the DOE administrative control level.

### **Water**

Active groundwater remediation is conducted to protect potential suitable habitat areas adjacent to the site, and to remove ammonia and uranium mass from the groundwater system. In addition to extraction of contaminated groundwater through eight wells located close to the tailings pile, freshwater (diverted river water) was injected through wells near the river as an additional way of minimizing the discharge of ammonia to the river. Surface water diversion was necessary from the end of June 2021 through September 2021 because areas adjacent to the well field became a suitable habitat for endangered fish species.