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# An evaluation of health risk to the public as a consequence of in situ uranium mining in Wyoming, USA

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1   **An evaluation of health risk to the public as a consequence of *in situ* uranium mining in**  
2   **Wyoming, USA**

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15

16 **Highlights**

17     • Most groundwater constituents do not change as a result of alkali ISR mining  
18     • After restoration,  $^{226}\text{Ra}$  decreases by about one half,  $^{nat}\text{U}$  increases by factor of about five  
19     • Radiological risk decreases, nephrotoxic biomarkers increase, clinical significance unclear

20  
21

22 **Abstract**

23 In the United States there is considerable public concern regarding the health effects of in situ  
24 recovery uranium mining. These concerns focus principally on exposure to contaminants  
25 mobilized in groundwater by the mining process. However, the risk arising as a result of mining  
26 must be viewed in light of the presence of naturally occurring uranium ore and other  
27 constituents which comprise a latent hazard. The United States Environmental Protection  
28 agency recently proposed new guidelines for successful restoration of an in situ uranium mine  
29 by limiting concentrations of thirteen groundwater constituents: arsenic, barium, cadmium,  
30 chromium, lead, mercury, selenium, silver, nitrate (as nitrogen), molybdenum, radium, total  
31 uranium, and gross  $\alpha$  activity. We investigated the changes occurring to these constituents at an  
32 ISR uranium mine in Wyoming, USA by comparing groundwater quality at baseline  
33 measurement to that at stability (post-restoration) testing. Of the groundwater constituents  
34 considered, only uranium and radium-226 showed significant ( $p < 0.05$ ) deviation from site-  
35 wide baseline conditions in matched-wells. Uranium concentrations increased by a factor of 5.6  
36 (95% CI 3.6-8.9 times greater) while radium-226 decreased by a factor of about one half (95%  
37 CI 0.42-0.75 times less). Change in risk was calculated using the RESRAD (onsite) code for an  
38 individual exposed as a resident-farmer; total radiation dose to a resident farmer decreased  
39 from pre- to post-mining by about 5.2 mSv  $\text{y}^{-1}$ . Higher concentrations of uranium correspond to  
40 increased biomarkers of nephrotoxicity, however the clinical significance of this increase is  
41 unclear.

42

43

44 1. **Introduction**

45 Approximately one eighth of the world's electricity (Nuclear Energy Institute 2014) is supplied  
46 by 435 nuclear reactors (Nuclear Energy Agency and International Atomic Energy Agency 2014).  
47 Over 58,000 tonnes of uranium ore were mined in 2014 to supply fuel for these reactors (Nuclear  
48 Energy Institute 2014). In 2013, 47% of world-wide uranium production was the result of *in situ*  
49 recovery (ISR) mining. In the United States, the fraction of uranium production attributable to  
50 ISR is much higher (World Nuclear Association 2015a). Domestically, seven operational ISR  
51 mines produce 2300 tonnes of uranium per year, approximately 11% of domestic uranium  
52 consumption (United States Energy Information Administration 2014), which powdered 100  
53 reactors generating one fifth of the nation's electricity (Nuclear Energy Institute 2014). ISR is the  
54 most economically efficient method of uranium extraction in the United States and an important  
55 generator of economic activity in rural parts of the country (e.g., Wyoming and South Dakota).  
56 However, there are risks associated with ISR uranium mining, most notably the contamination of  
57 a drinking-water aquifer with uranium or other heavy metals (United States Environmental  
58 Protection Agency 2008).

59 The ISR process utilizes a series of injector and recovery wells to access, without excavation,  
60 below-ground uranium orebodies. The chemistry of the ISR process varies with both geological  
61 and regulatory conditions; in the United States groundwater is pumped from recovery wells to  
62 the surface, where it is fortified with dissolved oxygen (or, less commonly hydrogen peroxide),  
63 carbon dioxide, and/or sodium bicarbonate, and then re-injected. Following each subsurface  
64 pass, the groundwater, now laden with uranium, is sent through ion-exchange resins for uranium  
65 recovery and re-fortified/rejuvenated. The circulation is a closed loop except for a small "bleed"  
66 (typically 0.5 to 1% of the total flow) maintained to prevent mine water from leaving the mining  
67 zone. When the ion exchange bed is filled to capacity with uranium, it is taken off-line and eluted;  
68 the resulting eluent is chemically treated to produce uranyl peroxide. A more detailed  
69 description of the ISR process can be found in Davis and Curtis (2007).

70

71 The ISR mining process may be conducted with either an acid or alkali agent. Currently, only the  
72 alkali process is used in the United States, although other countries such as Australia and  
73 Kazakhstan employ acid leach processes. Here, we only consider the alkali processes as these are  
74 the techniques used at our field site.

75

76 The goal of this study was to quantify the risk resulting from changes in groundwater, induced  
77 by ISR at a uranium mine in Wyoming, USA. Our hypothesis was that post-restoration (stability)  
78 conditions on-site represent either (1) a significant increase in groundwater constituents beyond  
79 the range of conditions found naturally on-site prior to mining, and/or (2) a significant increase  
80 in risk to a resident farmer.

81 **2. Material and Methods**

82           **2.1.       Description of Site**

83           The Smith Ranch-Highlands ISR uranium mine is located in Converse County, Wyoming, USA  
84           (Figure 1). The site is at 1500 m elevation and experiences a semi-arid climate, with an  
85           average annual temperature of 7°C and average annual precipitation of 319 mm (National  
86           Oceanic and Atmospheric Administration 2002). Wyoming is sparsely populated, with  
87           584,000 inhabitants occupying 250,000 square kilometers, an area roughly the size of the  
88           United Kingdom. The dominant ground cover is mixed grass prairie (State of Wyoming  
89           2010). Pronghorn antelope (*Antilocapra americana*), mule deer (*Odocoileus hemionus*),  
90           white tailed deer (*Odocoileus virginianus*), and game birds such as wild turkey (*Meleagris*  
91           *gallopavo*), ducks, and Canadian geese (*Branta canadensis*), which are consumed by some  
92           local residents, are frequently found on-site.

93  
94           Borch et al (2012) provide a detailed description of subsurface conditions at Smith Ranch-  
95           Highlands. Generally, uranium ore has been deposited in a sandy layer approximately 150-  
96           200 m below ground. The ore bearing sands are bounded above and below by shale deposits.  
97           Groundwater flow is estimated to be approximately 2-3 m per year. Uranium concentrations  
98           in ore body solids vary from a few hundredths of a percent to about one percent, with the  
99           bulk average typically being approximately 0.1%. Uranium ore deposits develop in  
100           permeable formations that are generally sandy. Borch et al (2012) describe the  
101           hydrogeological processes that deposit mineable uranium: within groundwater, soluble and  
102           mobile <sup>nat</sup>U(VI) moves along a hydrologic gradient. If it encounters reducing conditions,  
103           <sup>nat</sup>U(VI) precipitates to eventually form minerals such as uraninite, coffinite, and  
104           uranophane. The zone of solid uranium within the aquifer is known as a roll front. Figure 2,  
105           adapted from Davis and Curtis (2007), illustrates the formation of a uranium roll front.

106  
107           Four well fields were considered for this study, each consisting of multiple wells in a set  
108           pattern. The well fields were brought online asynchronously, and so are different stages of  
109           their lifecycle. Because of the asynchronicity of the wells' life stages, and the fact that mining  
110           is still ongoing at Smith Ranch Highlands, not all wells have been in each phase of operation.

111           **2.2.       Source of Data**

112           Baseline groundwater quality data was provided by Cameco Resources for well fields 1, 3, 4,  
113           and 4A. Stability (a regulatory phase wherein a post-production well field is monitored for  
114           geochemical stability prior to being released) testing has only been conducted for a subset

115 of wells in well field 1; this data was also provided by Cameco Resources. The baseline and  
116 stability samples were collected as part of site characterization and routine monitoring to  
117 satisfy regulatory requirements. Samples were collected and analyzed over an  
118 approximately eighteen-year period; the majority of these analyses were performed by  
119 Energy Labs Inc., in Casper, Wyoming. More recently, Intermountain Laboratories in  
120 Sheridan, Wyoming has been used for analysis.

121  
122 We performed statistical analysis on thirteen groundwater constituents considered to be of  
123 interest to the United States Environmental Protection Agency (USEPA), as well as a handful  
124 of other indicators of groundwater quality (total dissolved solids, alkalinity, pH) to ascertain  
125 the scope of the change induced to groundwater by the ISR process.

126  
127 **2.3. Statistical Analysis**

128 Figure 3 shows our process for determining whether a statistically robust change occurred  
129 in concentrations of a groundwater constituent between baseline and stability operational  
130 phases. Detailed analysis has been conducted on ground water, as described in section 2.2.  
131 Many of the constituents of interest to the USEPA are below minimum detectable  
132 concentrations (MDCs) in the groundwater at the Smith Ranch-Highlands site. Others were  
133 not tested for in the data provided to us by Cameco Resources. Those species with  
134 concentrations below the experimental MDC, in addition to those species for which analysis  
135 was not performed, were eliminated from consideration; table 1 details which constituents  
136 were eliminated at this stage. It should be noted that all MDCs were below US Safe Water  
137 Drinking Act (SWDA) concentrations except for Pb; SWDA concentrations are reported in  
138 table 2. Because the Pb MDC was above the SWDA regulation, it is possible that  
139 concentrations of Pb at Smith Ranch Highlands exceed regulatory limits for potable water.  
140 However, we lacked data to make this determination and opted to exclude Pb from our  
141 analysis.

142  
143 A series of Welch's t-tests were run to examine whether stability (post-restoration)  
144 conditions in well field 1 (the only well field for which stability testing has been conducted)  
145 differed significantly from (1) baseline conditions in the same well field and (2) baseline  
146 conditions throughout the site. The results of these tests indicate whether or not the  
147 concentrations found in stability differ significantly from those at baseline, or from naturally

148 occurring variability throughout the Smith Ranch-Highlands site. In order to obtain a normal  
149 distribution suitable for a parametric test, concentrations of  $^{226}\text{Ra}$  and  $^{nat}\text{U}$  were log  
150 transformed prior to t-testing.

151  
152 Finally, we retested those constituents that had a significant change from baseline to stability  
153 using the subset of wells for which both baseline and stability concentration data were  
154 available. We will refer to this subset of wells as matched wells.

155 R<sup>1</sup> version 3.1.2 was used for all statistical computations.

156  
157 **2.4. Biosphere Transport Model**

158 Simply measuring the scope of groundwater change as a result of ISR mining is insufficient  
159 for estimating the change in risk to humans. Food chain transfer as well as natural  
160 environmental processes influence the quantity of a contaminant to which humans are  
161 exposed.

162  
163 A resident farmer scenario was modelled at Smith Ranch Highlands using the US Department  
164 of Energy's RESRAD (onsite) code<sup>2</sup>. A resident farmer is an individual who moves onto the  
165 former mine site at some unspecified time in the future and engages in subsistence  
166 agricultural practice using a groundwater well. This scenario is not implausible; there are a  
167 handful of abandoned homes located on the Smith Ranch-Highland site used by  
168 homesteaders during the 20th century. The former occupants of these homes were likely  
169 engaged in activities similar to those selected for our model: ranching of livestock such as  
170 cattle and gardening to produce vegetables for human consumption. We modeled the source  
171 well as located within the uranium ore body in order to maximize the exposed resident  
172 farmer's exposure to groundwater contaminants<sup>3</sup>.

173  
174 The resident farmer was modeled as exposed through consumption of food, water and soil,  
175 with food separately including dairy, meat, and plants. No aquatic foods were considered  
176 due to the lack of natural surface water on or near Smith-Ranch Highland. All produce

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<sup>1</sup> <http://www.r-project.org/>

<sup>2</sup> <https://web.evs.anl.gov/resrad/>

<sup>3</sup> Input parameters for our model are available online as electronic supplement 1.

177 consumed was assumed to have come from a garden within the mined area. Ingestion and  
178 inhalation rates were set to the values recommended by the USEPA's exposure factor  
179 handbook (United States Environmental Protection Agency 2011), with the exception of  
180 meat consumption, which was increased to compensate for the lack of aquatic foods. Climate  
181 data for Converse County, Wyoming was taken from the reports of the United States National  
182 Oceanic and Atmospheric Administration (National Oceanic and Atmospheric  
183 Administration 2002).

184  
185 Our RESRAD (onsite) model took advantage of a source override procedure that allows a  
186 radionuclide source to be placed directly in groundwater. The model then ignores any  
187 below-ground geochemistry, holding the concentration of a contaminant in groundwater  
188 constant over time by adjusting the distribution coefficient ( $K_D$ ) to an appropriate value.  
189 This is reasonable for our exposure scenario: before site release can occur, the operator must  
190 establish that the belowground environment has reached chemical equilibrium, and that  
191 concentrations of groundwater contaminants are constant. Horizontal and vertical transport  
192 through the belowground environment were neglected, as these processes are unimportant  
193 for our exposure scenario and, due to site hydrogeology, insignificantly small over a human's  
194 lifespan. Direct external exposure and inhalation radiation dose were included in the model,  
195 but these contributed negligibly to overall radiation dose.

196 3. **Results**

197 3.1. **Effect of ISR Mining on Groundwater Quality**

198 3.1.1. **Constituents Above the Experimental MDC**

199 Of the thirteen species considered to be of interest to USEPA, only As, Se, total N  
200 ( $\text{NO}_3 + \text{NO}_2$ ),  $^{226}\text{Ra}$  (as total Ra), and  $^{nat}\text{U}$  were detectable above analytic limits. We chose  
201 to include TDS, alkalinity, and pH in this analysis as general indicators of change in  
202 groundwater quality. Per the process depicted in Figure 3, all these constituents were  
203 passed on to the next level of analysis.

204  
205 3.1.2. **Same Well Field Comparison, Baseline to Stability**

206 Stability concentrations of As, Se, total N ( $\text{NO}_3 + \text{NO}_2$ ),  $^{226}\text{Ra}$ , and  $^{nat}\text{U}$ , TDS, alkalinity, and  
207 pH were compared to baseline concentrations in well field 1, to determine if  
208 groundwater conditions after mining were within the baseline natural variation of well  
209 field 1. Stability concentrations were significantly different ( $p < 0.05$ ) from baseline

variability within well field 1, and all these constituents were passed on to the next level of analysis. The results of statistical testing are presented in table 3.

### 3.1.3. Well Field to Site Wide Comparison, Baseline to Stability

Stability concentrations of As, Se, total N ( $\text{NO}_3 + \text{NO}_2$ ),  $^{226}\text{Ra}$ , and  $^{nat}\text{U}$ , TDS, alkalinity, and pH were compared to baseline concentrations across the Smith Ranch-Highlands site, to determine if changes in groundwater quality due to mining were within site-wide natural variation at baseline. The statistical tests demonstrated that only alkalinity, As,  $^{226}\text{Ra}$ , TDS, and  $^{nat}\text{U}$  in the stability well field differed significantly from the naturally occurring variation across the Smith Ranch-Highlands site at baseline. The results of the tests are presented in table 3. Boxplots of  $^{nat}\text{U}$  and  $^{226}\text{Ra}$  concentrations, in baseline and stability, are given in figure 4.

### 3.1.4. Matched Well Comparison, Baseline to Stability

Stability concentrations of As, Se, total N ( $\text{NO}_3 + \text{NO}_2$ ),  $^{226}\text{Ra}$ , and  $^{nat}\text{U}$ , TDS, alkalinity, and pH were compared to baseline concentrations across the Smith Ranch-Highlands site, including only matched wells, that subset of wells for which both baseline and stability data was available.

Figure 5 depicts concentrations for matched wells at baseline and at stability. The t-test results were identical to those comparing stability to site-wide baseline: alkalinity, As,  $^{226}\text{Ra}$ , TDS, and  $^{nat}\text{U}$  showed significant variation. It should be noted that alkalinity is not regulated by the USEPA and median concentrations of As were well below the USEPA's regulatory limits for potable water. Only TDS,  $^{nat}\text{U}$ , and  $^{226}\text{Ra}$  exceeded USEPA's regulatory limits for potable water and showed variation between site-wide baseline and well field stability testing concentrations. As TDS is not one of the thirteen constituents of interest to USEPA, only  $^{nat}\text{U}$  and  $^{226}\text{R}$  were included in the risk assessment.

Table 4 presents the change in groundwater concentrations of  $^{nat}\text{U}$  and  $^{226}\text{Ra}$  from baseline to stability, as well as the results of the statistical test. As expected, the mining process oxidized  $^{nat}\text{U}(\text{IV})$  to  $^{nat}\text{U}(\text{VI})$ , mobilizing the uranium in groundwater. More surprising was a dramatic reduction in  $^{226}\text{Ra}$  in groundwater. We speculate that this may have occurred because radium is mobile in groundwater prior to the onset of mining, and

243 subsequently removed from groundwater by the ion exchange process. This is unlike  
244 uranium, which is actively mobilized from ore by the mining process, thereby  
245 introducing additional uranium into groundwater. However, it is difficult to propose a  
246 mechanism of change that accounts for the totality of changes in the subsurface  
247 environment as a result of mining, as changes in groundwater concentrations were not  
248 consistent. At Smith Ranch Highlands, we found that after mining, As increased relative  
249 to pre-mining (levels remained below regulatory limits for potable water, both before  
250 and after mining), while TDS and alkalinity decreased. Median concentrations of Se  
251 stayed approximately the same, but the distribution of concentrations spread  
252 significantly<sup>4</sup>. Subsurface geochemistry is enormously complex, and influenced by both  
253 physical and biological conditions (Campbell et al 2012), further obscuring the exact  
254 mechanism by which geochemical changes occur. Such uncertainties underscore the  
255 need for the detailed measurement and modelling of the ISR process on a site-specific  
256 basis.

### 257 3.2. RESRAD (onsite) Results

258 Model results demonstrated that  $^{226}\text{Ra}$  contributes far more to radiation dose than  $^{238}\text{U}$  for  
259 a resident farmer at the Smith Ranch-Highlands site. Given that uranium is understood to be  
260 more chemically than radiologically toxic, this is expected. A detailed description of total  
261 dose from each radionuclide, based on concentrations in matched-wells at baseline and  
262 stability, is presented as table 4. The model unsurprisingly identified water as the primary  
263 exposure pathway; a detailed description of total dose from each pathway is presented as  
264 table 5.

### 265 3.3. Risk Analysis

266 Radium and uranium represent different types of risk to exposed populations. While  
267 exposure to  $^{226}\text{Ra}$  results in a radiological risk, uranium's toxic mechanism in the body is  
268 principally chemical, not radiological (Wrenn et al 1985, Leggett 1989, Taylor and Taylor  
269 1997, Guseva Canu et al 2011, Kurttio et al 2002). Biological endpoints for radiation  
270 exposure are either stochastic (increased risk of cancer) at low doses or deterministic (direct  
271 damage) at high doses. This is in contrast to uranium, which like many heavy metals, causes  
272 kidney damage in exposed humans (Zamora et al 1998, Mao et al 1995, Thun et al 1985,  
273

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<sup>4</sup> Detailed boxplots of groundwater concentrations are available as electronic supplement 2.

274 Russell et al 1996, Kurttio et al 2002). This damage occurs at uranium exposures far below  
275 those necessary to induce stochastic or deterministic radiation effects due to radioactive  
276 decay (Guseva Canu et al 2011).

277 Because of the chemotoxic mechanism of uranium, it is difficult to harmonize the risk arising  
278 from increased exposure to uranium with the risk from decreased exposure to radium:  
279 exposure to radium at the concentrations found at Smith Ranch Highlands confers a risk of  
280 cancer years in the future, while exposure to uranium confers a risk of near-term kidney  
281 damage. Thus, we have elected to consider each component of risk separately, commenting  
282 on both the magnitude of the change in risk as well as expected public health outcomes.

283

### 284 3.3.1. Cancer risk following exposure to <sup>nat</sup>U and <sup>226</sup>Ra

285 Table 6 summarizes radiation dose rate results, which were calculated with RESRAD  
286 (onsite) using concentrations of <sup>226</sup>Ra and <sup>nat</sup>U from groundwater in matched wells, at  
287 baseline and in stability. Uranium concentrations increased from baseline to stability,  
288 resulting in a 0.36 mSv y<sup>-1</sup> increase in radiation dose to the resident farmer. <sup>226</sup>Ra  
289 concentrations decreased from baseline to stability, resulting in a 5.6 mSv y<sup>-1</sup>  
290 decrease in radiation dose rate. Overall, mining resulted in a 5.2 mSv y<sup>-1</sup> decrease in  
291 radiation dose to the resident farmer. This corresponds to a reduction of 260 mSv  
292 over a 50 year adult lifetime. The BEIR VII report (2006) concludes that every  
293 additional 100 mSv of radiation dose received corresponds to a 1% increase in cancer  
294 (solid cancer or leukemia) incidence (Biological Effects of Ionizing Radiation VII  
295 2006). Thus the reduction in dose rate as a result of mining corresponds to a 2.6%  
296 decrease in cancer incidence compared to a resident farmer consuming water from  
297 the pre-mining aquifer.

298

### 3.3.2. Nephrotoxicity of <sup>nat</sup>U

299 Guseva Canu et al (2011) undertook a review of available studies on uranium toxicity  
300 as a result of consuming naturally contaminated water. In total they identified 27  
301 “peer-reviewed published reports of original epidemiological studies, including  
302 studies of uranium, radium, and radon” from the period of 1970-2011 (Guseva Canu  
303 et al, 2011). Of these studies, seven assessed the incidence of renal damage as a  
304 function of exposure to naturally occurring uranium (Mao et al 1995, Zamora et al  
305 1998, Kurttio et al 2002, Kurttio et al 2005, Kurttio et al 2006, Seldén et al 2009,

306 Zamora et al 2009) with approximately 1500 subjects across all seven studies. The  
307 average concentration of uranium consumed in water in these studies varied between  
308 25  $\mu\text{gU L}^{-1}$  and 180  $\mu\text{gU L}^{-1}$ ; with this level of uranium exposure statistically correlated  
309 with various biomarkers of renal damage. The values reported are comparable to our  
310 study site's baseline median of 73  $\mu\text{gU L}^{-1}$  and stability median of 411  $\mu\text{gU L}^{-1}$  in  
311 matched wells. In short, while an exact threshold for uranium nephrotoxicity has not  
312 been established, it likely occurs somewhere around the baseline median value at  
313 Smith Ranch-Highlands. Kurttio et al (2006) report a modest (on the order of 10%)  
314 increase in biomarkers of kidney dysfunction as concentrations of uranium in water  
315 increase from tens of  $\mu\text{gU L}^{-1}$  to hundreds or thousands of  $\mu\text{gU L}^{-1}$ , but also note that:

316 The clinical significance of [our] results is not easily established... Tubular  
317 dysfunction manifested within the normal physiological range, but occurred  
318 without an apparent threshold. Excretion of calcium, phosphate, and glucose  
319 remained within normal range in most subjects, even for persons with very  
320 high and long-lasting exposure to uranium. These findings are consistent with  
321 studies of occupational exposure to uranium failing to demonstrate overt  
322 kidney disease among workers exposed to uranium. (Kurttio et al, 2006)

323 Additionally, the authors note that renal failure is associated with only very high (10-  
324 25  $\text{mgU kg}^{-1}$  body weight) acute exposures to uranium (Kurttio et al 2006). For an  
325 adult human of 60 kg, this corresponds to a 0.6-1.5gU ingestion – the equivalent of  
326 drinking, at a minimum, 1500 L of stability mine water in a single, acute exposure.

327

#### 328 4. ***Discussion***

##### 329 4.1. **Implications of Risk Analysis**

330 The results of this study indicate that it is possible that radiation dose (from radium) is  
331 actually slightly decreased as a result of ISR uranium mining. The increased concentration  
332 of uranium in groundwater due to ISR uranium mining would point to an increased risk of  
333 nephrotoxicity, but not cancer, with no impact on mortality (Agency for Toxic Substances  
334 and Disease Registry 2013). Since radium and uranium each have an independent biological  
335 endpoint for risk, it difficult to harmonize the two changes in risk. We did not find that other  
336 groundwater constituent concentrations changed significantly as a result of mining,

337 although they may have been present in sufficient quantities – before and/or after mining –  
338 to impact human health.

339  
340 It should be emphasized that this model was a “worst case” analysis of wellfield 1, based on  
341 the most contaminated groundwater, which is found directly within the ore body. Due to  
342 high site variability, drilling a well just tens of meters away from the ore body may  
343 dramatically lower an individual’s risk.

344  
345 **4.2. Limitations and Uncertainties**

346 Limitations to this analysis can be loosely grouped into three categories: dose/effects  
347 relationships, characterization uncertainties, and uncertainties associated with  
348 variability/heterogeneity.

349  
350 *Dose/effects uncertainties* are those uncertainties that are present in epidemiologic or  
351 toxicologic studies on the effects of a stressor on humans. For example, the BEIR VII (2006)  
352 report dataset has some important confounders: acute exposures to radiation may be more  
353 harmful than a continuous low dose exposure, which is the exposure scenario more  
354 applicable to our resident farmer scenario. We have also not considered the increased  
355 sensitivity associated with exposure to radiation or other stressors during sensitive life  
356 stages, such as exposure to children or to the fetus *in utero*, principally because there is  
357 limited data concerning uranium toxicity variability between life stages. Finally, the  
358 interactions between multiple stressors may be important for understanding the net effect  
359 of the consumption of uranium mine water on an individual. Multi-stressor theory holds that  
360 the net effect of multiple, simultaneous exposures may be greater than the sum of exposures  
361 given individually. Given the number of constituents in mine water, such analysis is relevant  
362 to conducting risk analysis at an ISR mine.

363  
364 *Characterization uncertainty* arises as a result of limitations in the sampling scheme or  
365 analytic techniques used. In this study, well water samples were not continuously collected  
366 and analyzed for their chemical content. Rather, well water was collected and analyzed at  
367 discrete times, sometimes years apart; how groundwater quality varied between time points  
368 is not known. Stability testing is meant occur over several years, in part to address this  
369 concern by establishing that groundwater concentrations remain nearly-constant after

370 restoration is complete. Additionally, samples were not analyzed for the chemical speciation  
371 of uranium; some uranium complexes are not cytotoxic, e.g. calcium-uranyl-carbonato  
372 complexes (Prat et al, 2009). Depending upon the speciation of uranium in groundwater at  
373 Smith Ranch-Highlands, the risk of groundwater consumption may be lower than estimated  
374 here.

375

376 *Site wide variability* should also be considered when interpreting the results of this study. Our  
377 results were for a single well field (the only well field for which stability testing has been  
378 conducted). Given the variability of groundwater quality across the Smith Ranch Highlands  
379 site (for e.g., uranium, as shown in Figure 4), it is likely that our result, or any single result, is  
380 not generalizable between well fields or mine sites. To understand the changes to  
381 groundwater resulting from ISR uranium mining requires a complete understanding of site-  
382 conditions.

383

## 384 5. Conclusions

385 Our statistical analysis and risk-based impact assessment at an ISR mine in Wyoming, USA had  
386 some unexpected results: chiefly, that  $^{226}\text{Ra}$  concentrations in groundwater decreased  
387 dramatically as a result of the mining process. This type of analysis may prove useful to regulators  
388 and operators alike, providing a paradigm to arrive at site closure criteria that is more flexible  
389 than the current approach, which requires adherence to rigid groundwater standards and does  
390 not account for natural background or variability. Geoscience Australia (2010) recommends that  
391 “For lease relinquishment, regulators should be confident that the rehabilitated site does not  
392 present any significant radiation exposure risks, impacts on groundwater quality are as limited  
393 as is practicable, and the site will be fit for agreed future land uses.” Risk analysis, such as that  
394 undertaken here, would ideally be based on data coupled with geo- and biosphere transport  
395 codes, as appropriate and should be used to assist in setting site closure criteria. A data-driven  
396 approach is necessary at ISR uranium mines, where predictive modelling of changes to  
397 subsurface geochemistry resulting from mining may not be reliable, and intra- and inter- site  
398 variability is extremely high, making adherence to a generalized standard at sites with diverse  
399 geochemical conditions impractical.

400

401 Finally, the USEPA notes that there is “only very limited data in the open literature” concerning  
402 the stability of restored ISR well fields in the United States (USEPA 2014). This lack of data makes

403 it difficult to establish regulatory endpoints and is damaging both to both regulators and mining  
404 operations. While it may be tempting to require mining companies to bear the financial burden  
405 for generating this data, such work is better funded and conducted by impartial institutions, e.g.,  
406 federal or state governments, universities, or other independent agencies. Such a separation  
407 would ensure the integrity and pedigree of reported data by preventing conflicts of interest.

408 **6. Future Work**

409 The results of this study were unexpected and have underscored how poorly studied ISR uranium  
410 operations are in the United States. Further work investigating the magnitude of impacts that ISR  
411 uranium mining has on the geosphere and biosphere – both in the short and the long term – is  
412 critical to the establishment of a reasonable regulatory structure and the protection of the public.

413  
414 Within the next decade, additional data will become available as more ISR mine units near the  
415 end of their life cycle: such data should be the subject of additional analysis, similar to the one  
416 conducted as a part of this study, so that the impacts of ISR uranium mining on groundwater  
417 quality may be better understood.

418  
419 **7. Acknowledgements**

420 The authors thank Dr. James Clay of Cameco Resources for providing data related to  
421 groundwater quality at Smith Ranch-Highlands and Dr. Peter Woods of the International Atomic  
422 Energy Agency for furnishing literature concerning ISR best practices in Australia.  
423 This study was funded by the State of Wyoming ISR Uranium Technologies Research Program,  
424 with matching funds from Cameco Resources.

425  
426 **8. Conflict of Interest**

427 This study was financed by the State of Wyoming. Cameco Resources provided no financial  
428 assistance. The authors maintain technical and personal relationships with employees of Cameco  
429 Resources but have never been employed by nor accepted any remuneration from that  
430 organization.

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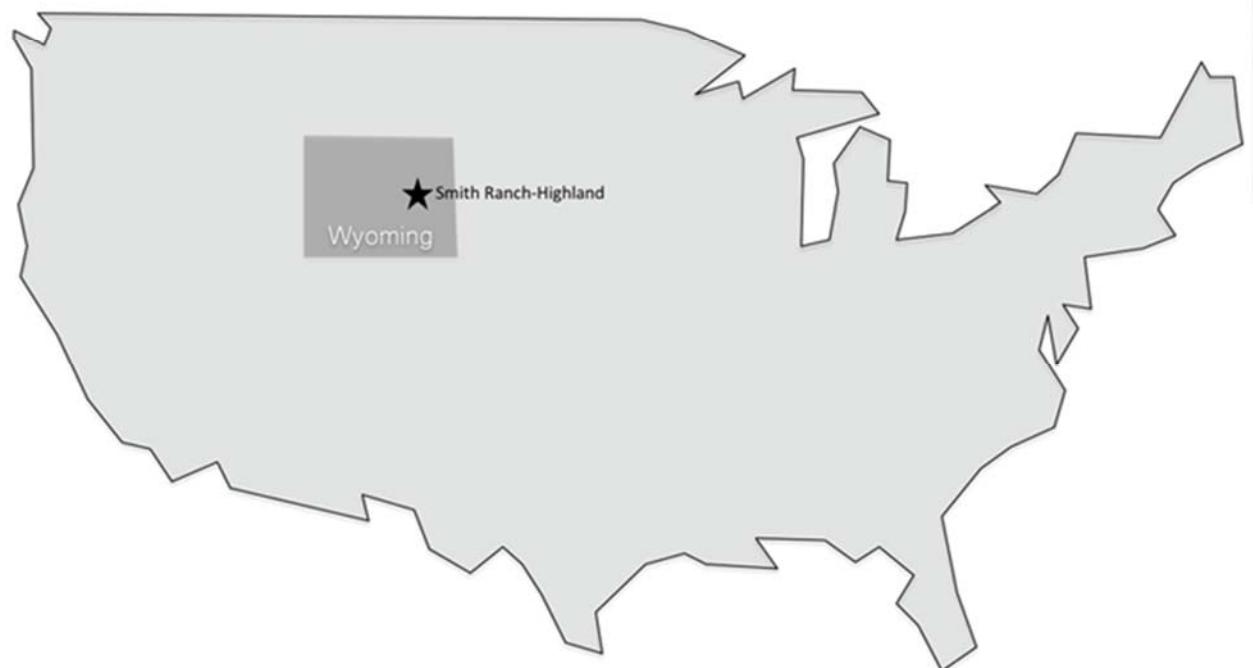
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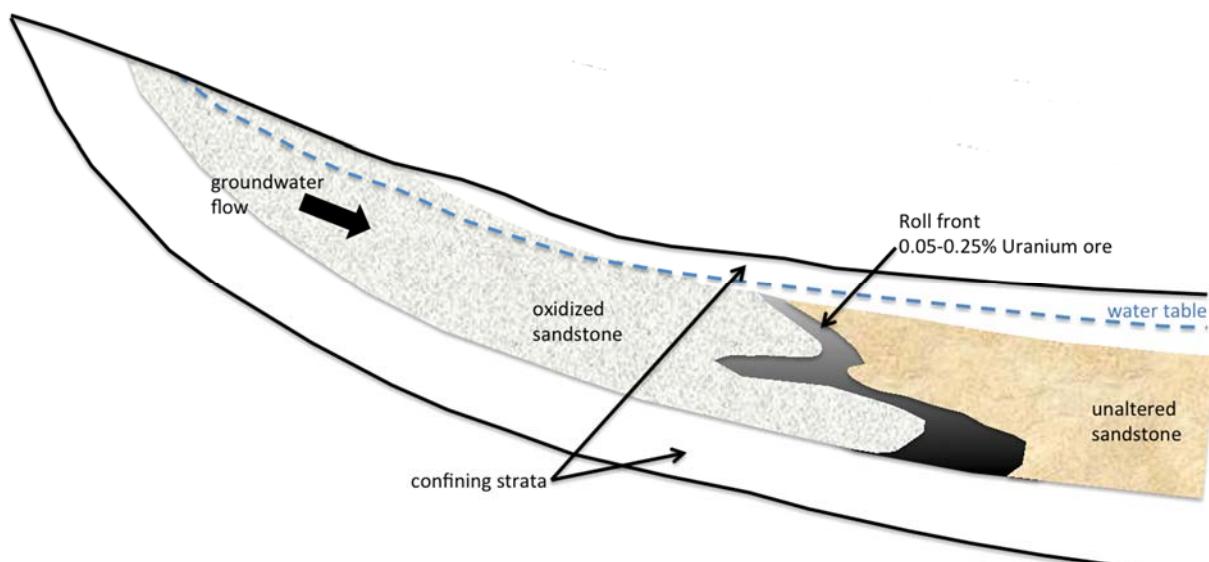
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**Figure 1:** Map showing location of the Smith Ranch-Highlands site and photograph depicting site landscape and a typical well-field.

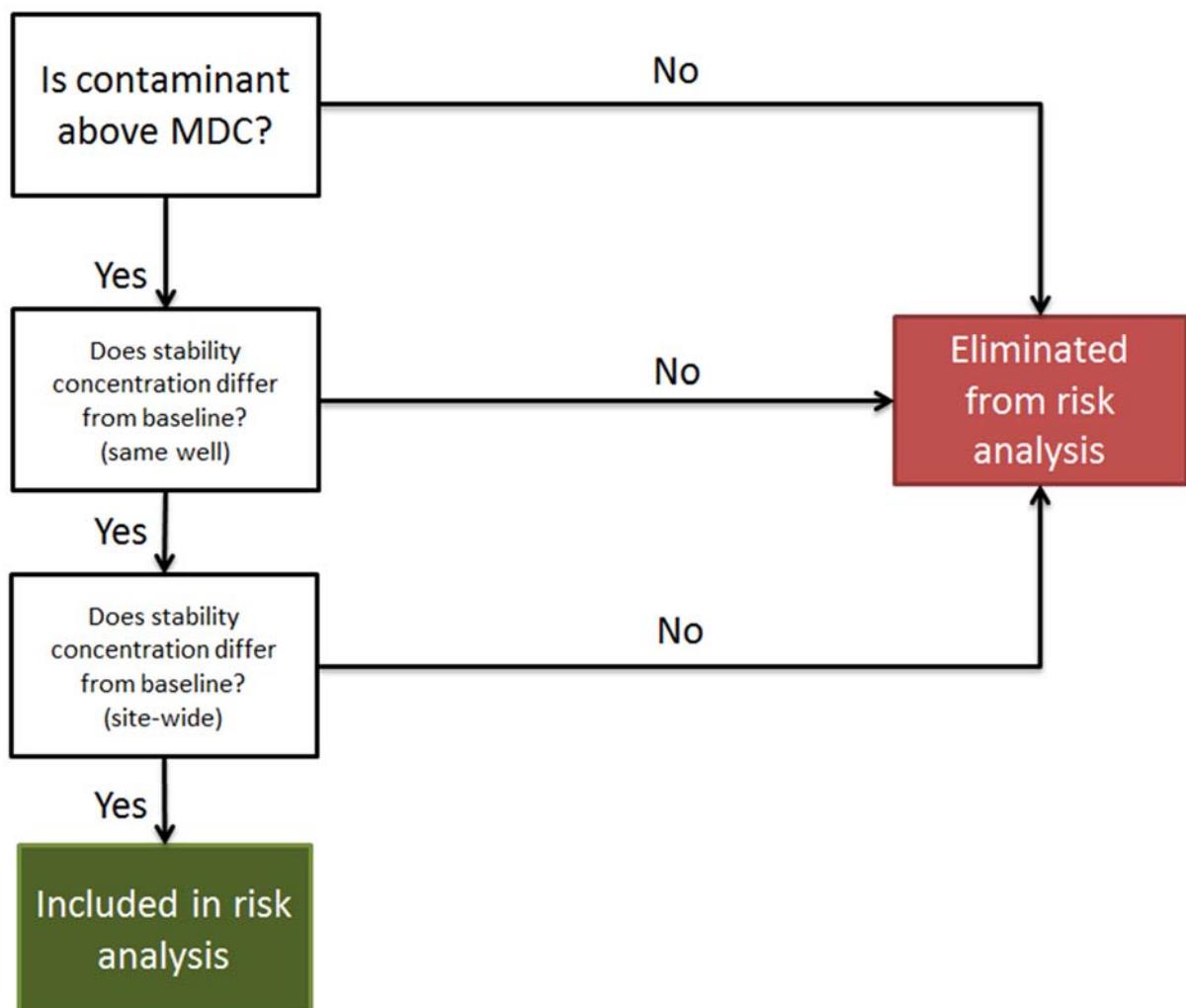


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**Figure 2:** The formation of a uranium roll front. Adapted from Davis and Curtis (2007).



546 **Figure 3** Flowchart describing how contaminants were eliminated from risk analysis.

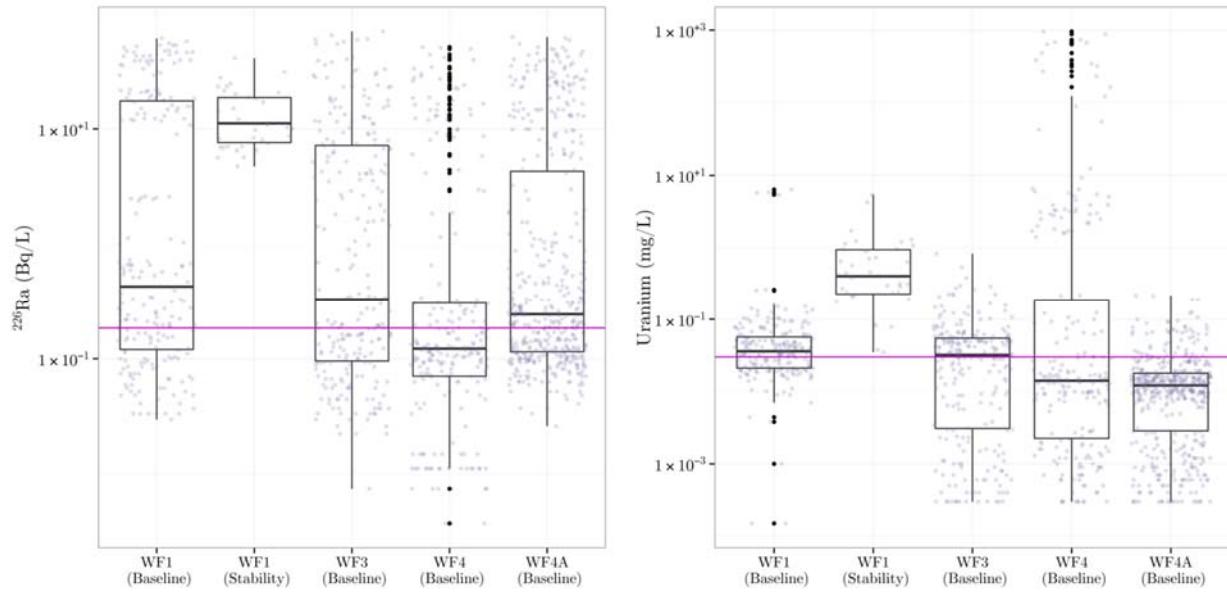


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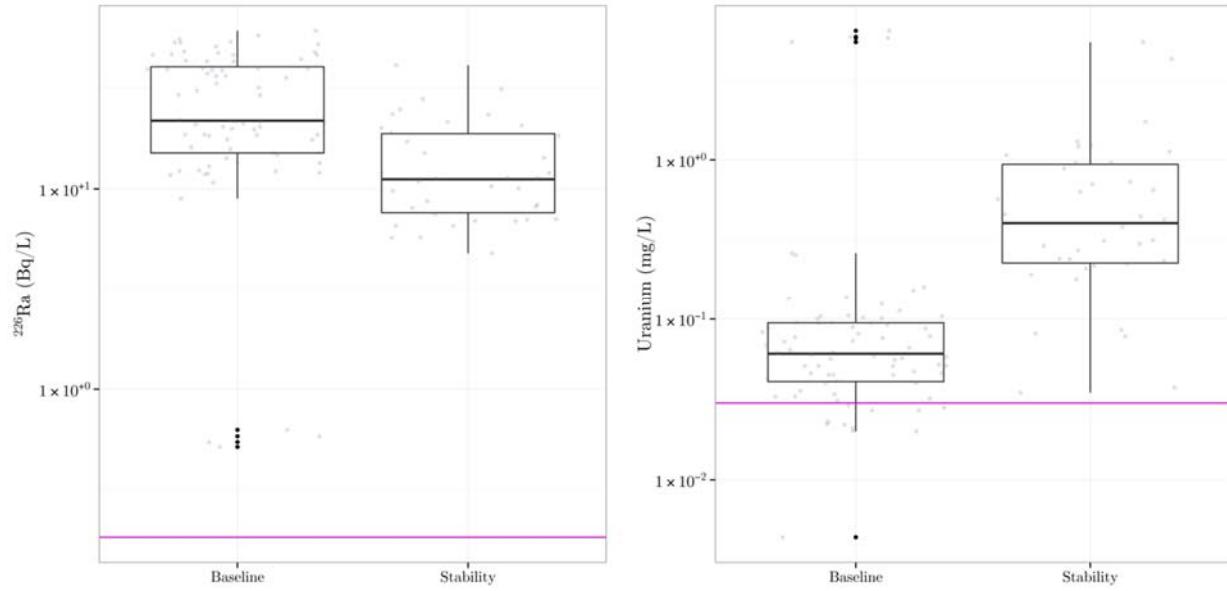
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550 **Figure 4** Stability concentrations of  $^{226}\text{Ra}$  and  $^{\text{nat}}\text{U}$  in well field 1 compared to baseline conditions  
551 site-wide. USEPA's limit appears as a pink horizontal line.



552

553 **Figure 5** Stability concentrations of  $^{226}\text{Ra}$  and  $^{\text{nat}}\text{U}$  in well field 1 compared to baseline concentrations  
554 in well field 1. Only matched wells - tested both at baseline and in stability - are displayed. USEPA's  
555 limit appears as a pink horizontal line.



556

557

558 **Table 1:** Abundance of groundwater constituents of interest to USEPA, and others selected for study  
 559 by the authors. Underlined text indicates a constituent was present in multiple wells above the  
 560 minimum detectable concentration (MDC) in groundwater from Smith Ranch-Highlands. We have  
 561 also included data about the total number of wells sampled, and the total number of samples  
 562 acquired. Note that these data describe the results of the first round of stability (post-mining) testing,  
 563 completed in September 2014.

Constituent	Regulated by USEPA	Well Field 1 (stability)	Well Field 1 (baseline)	Well Field 3 (baseline)	Well Field 4 (baseline)	Well (ba
		n <sub>wells</sub> =20 n <sub>measurement</sub> =40	n <sub>wells</sub> =66 n <sub>measurement</sub> =275	n <sub>wells</sub> =69 n <sub>measurement</sub> =248	n <sub>wells</sub> =72 n <sub>measurement</sub> =220	n <sub>wells</sub> =72 n <sub>measurement</sub> =220
<u>As</u>	yes	> MDC	> MDC	> MDC	> MDC	> MDC
Ba	yes	< MDC	not analyzed	not analyzed	< MDC	not analyzed
Cd	yes	< MDC	< MDC	< MDC	< MDC	< MDC
Cr	yes	< MDC	< MDC	< MDC	< MDC	< MDC
Pb	yes	< MDC	not analyzed	not analyzed	< MDC	not analyzed
Hg	yes	not analyzed	not analyzed	not analyzed	> MDC	not analyzed
<u>Se</u>	yes	> MDC	> MDC	> MDC	> MDC	> MDC
Ag	yes	not analyzed	not analyzed	not analyzed	not analyzed	not analyzed
<u>NO<sub>3</sub>+NO<sub>2</sub></u>	yes	> MDC	> MDC	> MDC	> MDC	> MDC
Mo	yes	< MDC	< MDC	< MDC	< MDC	< MDC
<u><sup>226</sup>Ra</u>	yes (as total Ra)	> MDC	> MDC	> MDC	> MDC	> MDC
<u>U</u>	yes	> MDC	> MDC	> MDC	> MDC	> MDC
gross alpha	yes	not analyzed	not analyzed	not analyzed	not analyzed	not analyzed
<u>TDS</u>	no	> MDC	> MDC	> MDC	> MDC	> MDC
<u>Alkalinity</u>	no	> MDC	> MDC	> MDC	> MDC	> MDC
<u>pH</u>	no	> MDC	> MDC	> MDC	> MDC	> MDC

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566 **Table 2:** US Safe Water Drinking Act Standards for 13 groundwater constituents proposed by the  
567 USEPA to be of interest at ISR mine facilities.

<b>Constituent</b>	<b>SWDA Limit</b>
Arsenic	0.010 mg L <sup>-1</sup>
Barium	2 mg L <sup>-1</sup>
Cadmium	0.005 mg L <sup>-1</sup>
Chromium	0.1 mg L <sup>-1</sup>
Lead	0.015 mg L <sup>-1</sup>
Mercury	0.002 mg L <sup>-1</sup>
Selenium	0.05 mg L <sup>-1</sup>
Silver	0.1 mg L <sup>-1</sup>
Nitrate (as nitrogen)	10 mg L <sup>-1</sup>
Molybdenum	Unregulated contaminant
Radium (226+228)	0.185 Bq L <sup>-1</sup>
Uranium	0.030 mg L <sup>-1</sup>
Gross- $\alpha$	0.555 Bq L <sup>-1</sup>

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571 **Table 3:** Comparison of stability (post-restoration) conditions in well field 1 with baseline conditions  
572 in well field 1 and site-wide baseline conditions.

Groundwater constituent	Stability conditions differ from MU1 baseline?	Stability conditions differ from site-wide baseline?
Alkalinity	Yes p<0.001	Yes p<0.001
As	Yes p<0.001	Yes p<0.001
NO <sub>3</sub> +NO <sub>2</sub>	Yes p=0.02	No
pH	Yes p<0.001	No
<sup>226</sup> Ra	Yes p<0.001	Yes p<0.001
Se	Yes p=0.02	No
TDS	Yes p<0.001	Yes p<0.001
<sup>nat</sup> U	Yes p<0.001	Yes p<0.001

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575 **Table 4:** Magnitude and significance of change from baseline to stability in groundwater  
576 concentrations of  $^{226}\text{Ra}$  and  $^{\text{nat}}\text{U}$  for matched well measurements. Twenty matched wells were  
577 measured. In total, 40 measurements were made at baseline (December 1996 – January 1997), and  
578 40 have been made so far in stability (January 2014 – September 2014).

<b>Constituent</b>	<b>Change in median concentration, baseline to stability</b>	<b>95% Confidence Interval</b>	<b>p-value</b>
$^{226}\text{Ra}$	0.56 times less	0.42-0.75 times less	<0.001
$^{\text{nat}}\text{U}$	5.61 times greater	3.6-8.9 times greater	<0.001

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581 **Table 5:** Sources of total radiation dose, as a fraction of total dose and by pathway, calculated by  
582 RESRAD. Note that this is per nuclide, as nuclide concentrations (and therefore contribution to total  
583 dose) change between baseline and stability.

Species	Ground	Inhalation	Water	Plants	Meat	Milk
<b>Shine</b>						
$^{238}\text{U}$	0	0	0.60	0.35	0.01	0.04
$^{226}\text{Ra}$	0	0	0.57	0.34	0.03	0.06

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586 **Table 6:** RESRAD calculated radiation dose rates to resident farmer based on concentrations of  
587 radionuclides in groundwater at baseline and stability, for matched wells.

Species	Baseline median concentration (Bq L <sup>-1</sup> )	Baseline median dose rate (mSv y <sup>-1</sup> )	Stability median concentration (Bq L <sup>-1</sup> )	Stability median dose rate (mSv y <sup>-1</sup> )	Δdose rate (mSv y <sup>-1</sup> )
<sup>238</sup> U	0.9	0.08	5.1	0.44	0.36
<sup>226</sup> Ra	21.4	12.6	11.9	7.0	-5.6

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590 **Electronic supplement 1: RESRAD parameters for risk model.**

591 All parameters not detailed here were left as RESRAD defaults.

**Contaminated Zone**

Not considered in model. Our model scenario considered groundwater contamination only, with no contaminated zone near the surface.

**Cover / Hydrology**

Evapotranspiration coefficient	0.2	National Oceanic and Atmospheric Administration Technical report NWS-33. <a href="http://www.wrds.uwyo.edu/sco/climateatlas/evaporation.html">http://www.wrds.uwyo.edu/sco/climateatlas/evaporation.html</a>
Wind speed	4.5 m/s	<a href="https://weatherspark.com/averages/30046/Douglas-Wyoming-United-States">https://weatherspark.com/averages/30046/Douglas-Wyoming-United-States</a>
Precipitation	0.012 m/yr	National Oceanic and Atmospheric Administration Climatology of the United States No. 81 <a href="http://cdo.ncdc.noaa.gov/climate normals/clim81/WYnorm.pdf">http://cdo.ncdc.noaa.gov/climate normals/clim81/WYnorm.pdf</a>
Irrigation	0.65 m/yr	Enough to grow corn, minus natural precipitation <a href="http://www.extension.org/pages/14080/corn-water-requirements#.VCSCho_F-5I">http://www.extension.org/pages/14080/corn-water-requirements#.VCSCho_F-5I</a>
Runoff coefficient	0.2	RESRAD user manual table E.1, for "rolling land"

**Saturated Zone**

Groundwater transport not considered; only pumping from groundwater to the biosphere. These parameters were left as default and do not affect the outcome of the model.

**Unsaturated Zone**

Left as default

**Occupancy**

Inhalation rate	2591 m <sup>3</sup> /yr	USEPA Exposure Factors Handbook <a href="http://www.epa.gov/ncea/efh/pdfs/efh-complete.pdf">http://www.epa.gov/ncea/efh/pdfs/efh-complete.pdf</a>
Indoor dust filtration	0.4	Alzona et al. 1979 : Alzona, J., et al., 1979, "Indoor-Outdoor Relationships for Airborne Particulate Matter of Outdoor Origin," Atmospheric Environment 13:55-60.
External gamma shielding	0.68	Dickson, Elijah. Experimental shielding evaluation of the radiation protection provided by residential structures. Dissertation, Oregon State University 2013. <a href="https://ir.library.oregonstate.edu/xmlui/handle/1957/38431">https://ir.library.oregonstate.edu/xmlui/handle/1957/38431</a>
Indoor time fraction	0.5	Consistent with farmer
Outdoor time fraction	0.5	Consistent with farmer

**Ingestion - Dietary**

Fruit, veg, grain	330 kg/yr	USEPA Exposure Factors Handbook <a href="http://www.epa.gov/ncea/efh/pdfs/efh-complete.pdf">http://www.epa.gov/ncea/efh/pdfs/efh-complete.pdf</a> ; 70kg adult
Leafy veg	50 kg/yr	USEPA Exposure Factors Handbook <a href="http://www.epa.gov/ncea/efh/pdfs/efh-complete.pdf">http://www.epa.gov/ncea/efh/pdfs/efh-complete.pdf</a> ; 70kg adult
Milk	250 L/yr	USEPA Exposure Factors Handbook <a href="http://www.epa.gov/ncea/efh/pdfs/efh-complete.pdf">http://www.epa.gov/ncea/efh/pdfs/efh-complete.pdf</a> ; 70kg adult
Meat and poultry	150 kg/yr	USEPA Exposure Factors Handbook <a href="http://www.epa.gov/ncea/efh/pdfs/efh-complete.pdf">http://www.epa.gov/ncea/efh/pdfs/efh-complete.pdf</a> ; 70kg adult
Fish	0	No surface water - no source of fish, take assumed poundage instead to be beef
Other seafood	0	No surface water - no source of fish, take assumed poundage instead to be beef
Soil	7.3 g/yr	USEPA Exposure Factors Handbook <a href="http://www.epa.gov/ncea/efh/pdfs/efh-complete.pdf">http://www.epa.gov/ncea/efh/pdfs/efh-complete.pdf</a> ; 70kg adult
Drinking water	1095 L/yr	USEPA Exposure Factors Handbook <a href="http://www.epa.gov/ncea/efh/pdfs/efh-complete.pdf">http://www.epa.gov/ncea/efh/pdfs/efh-complete.pdf</a> ; 70kg adult
Contaminated fraction	1	No other source for food, all food comes from areas/foods irrigated with mine water

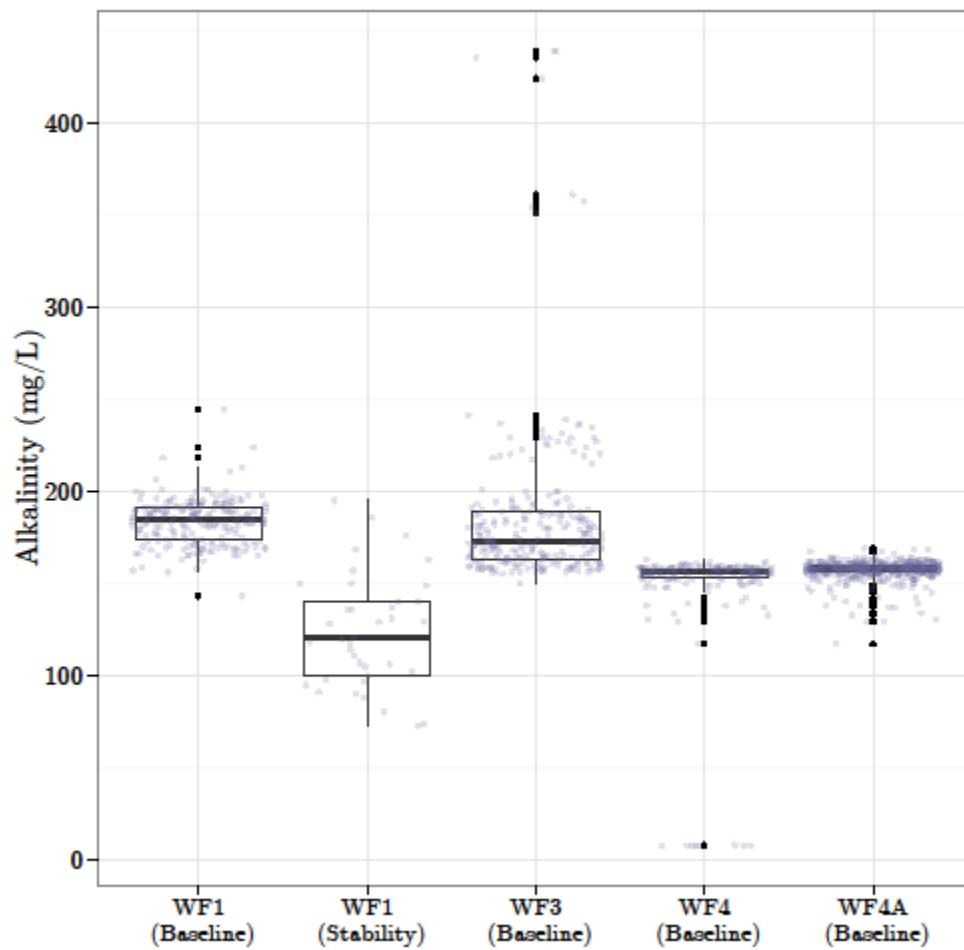
<b>Storage Times</b>		
Fruit, veg, grain	14d	RESRAD Default
Leafy veg	1d	RESRAD Default
Milk	1d	RESRAD Default
Meat and poultry	20d	RESRAD Default
fish	n/a	No seafood consumption
Crustacean and mollusks	n/a	No seafood consumption
Well water	1d	RESRAD Default
Surface water	1d	RESRAD Default
Livestock fodder	140d	Roughly half the time (winter), livestock are on fodder that has been stored from the summer harvest.

594 **Electronic supplement 2: All boxplot data**

595 The first boxplot displayed for each constituent includes all data points, the second boxplot is  
596 matched wells – those wells that have entered the stability phase and been characterized. The pink  
597 line represents the US EPA's potable water limit – where it is not displayed, no regulatory limit  
598 exists.

599

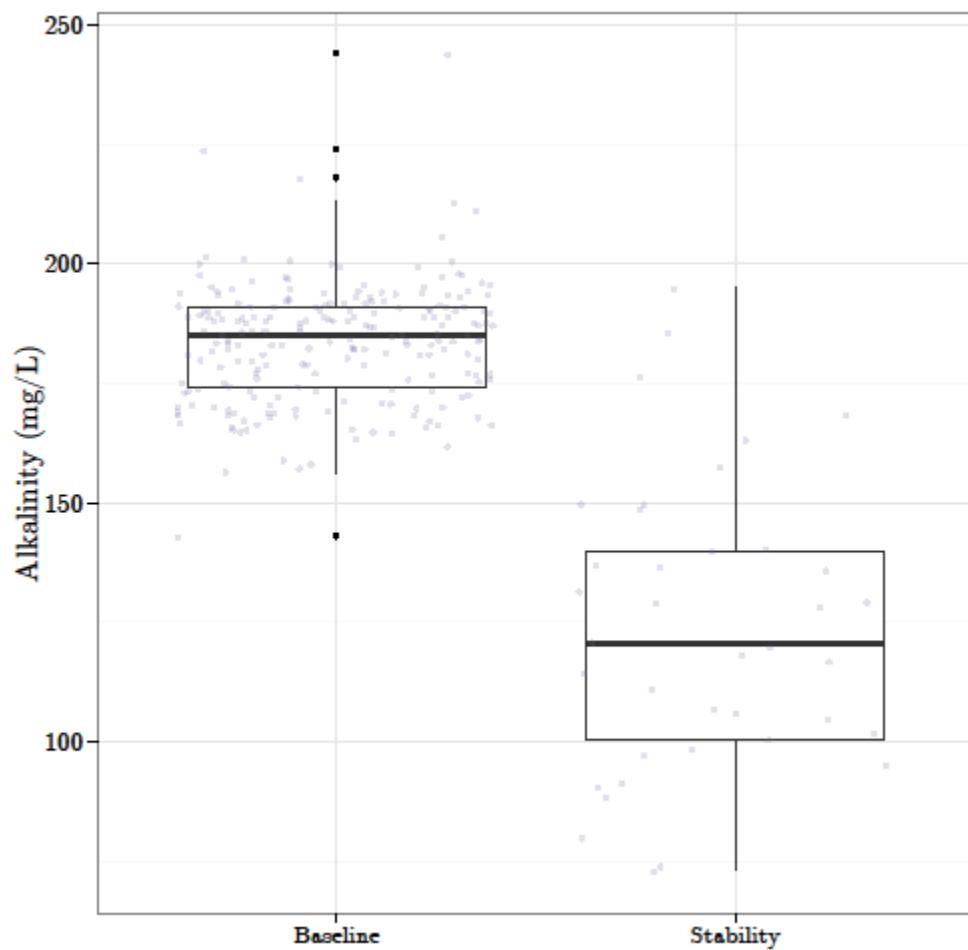
600 Alkalinity - all wells



601

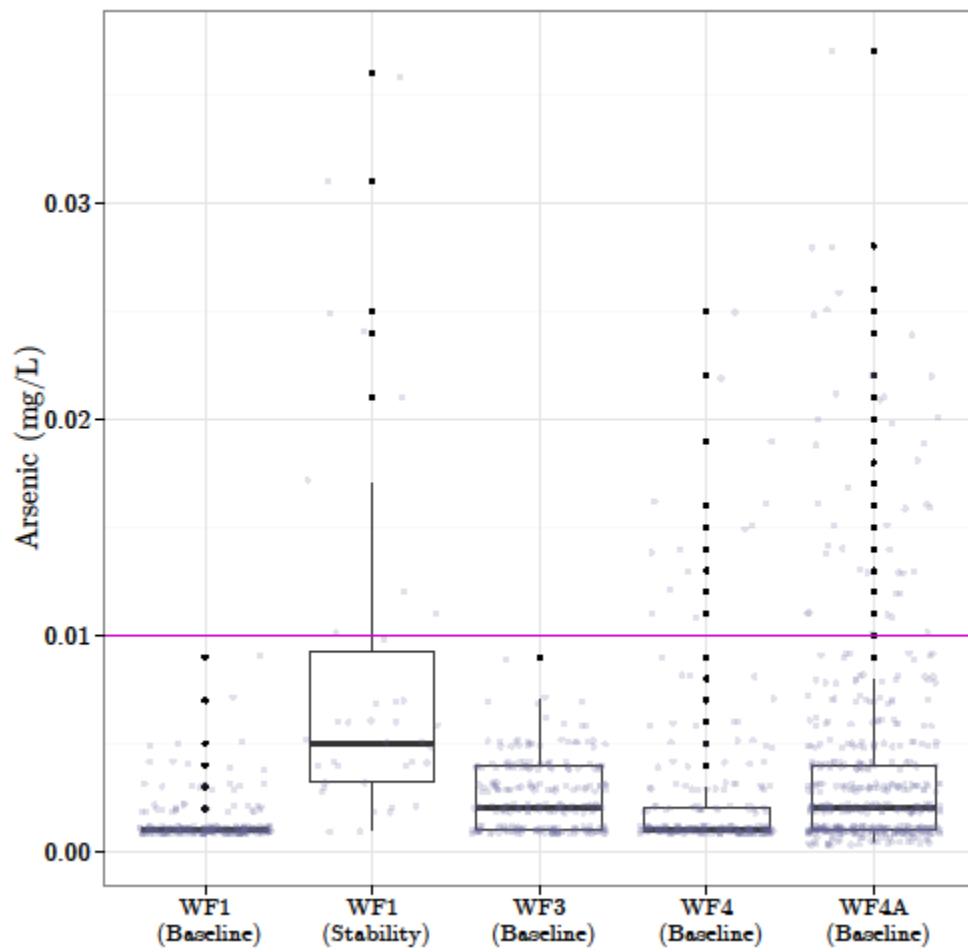
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603 Alkalinity - matched wells



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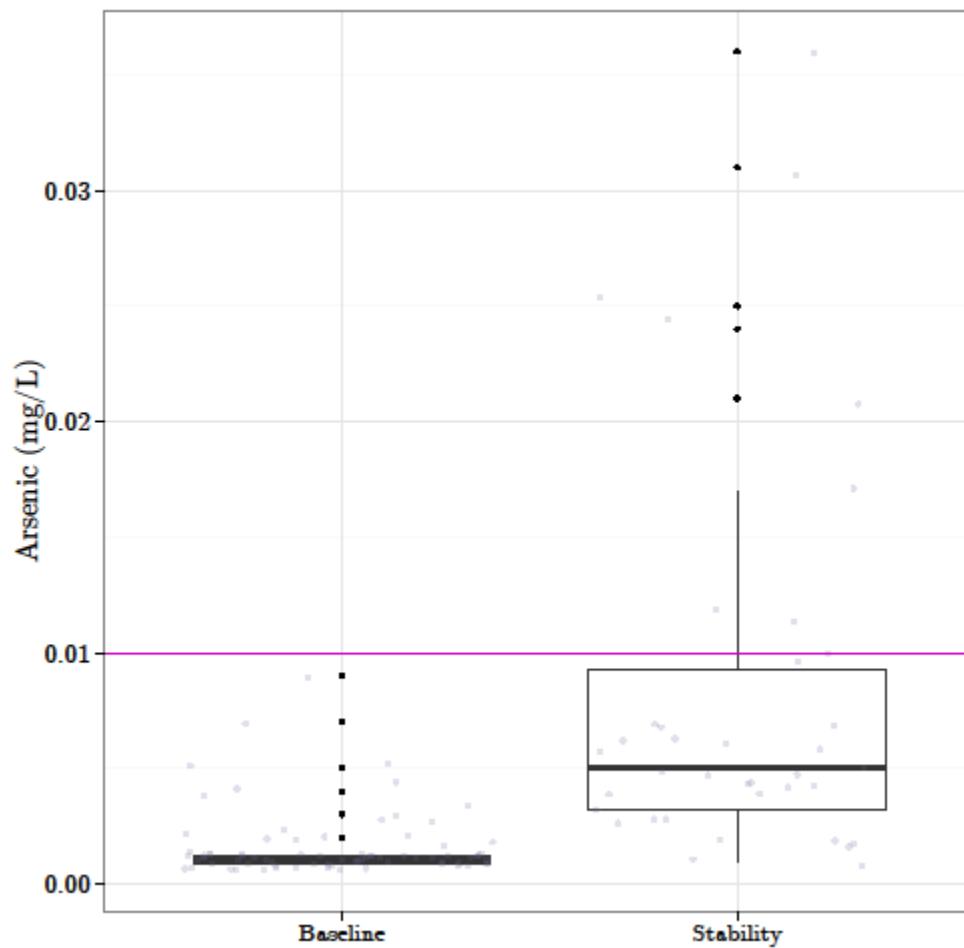
606 Arsenic – all wells



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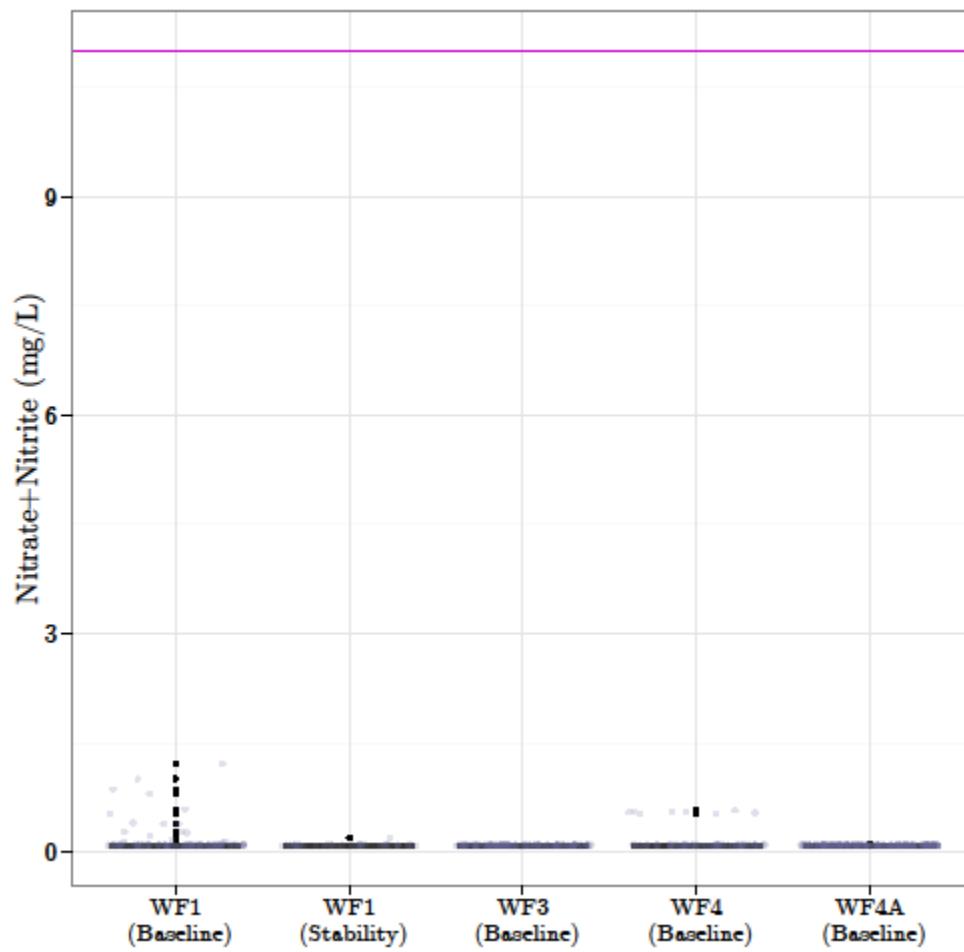
609 Arsenic - matched wells



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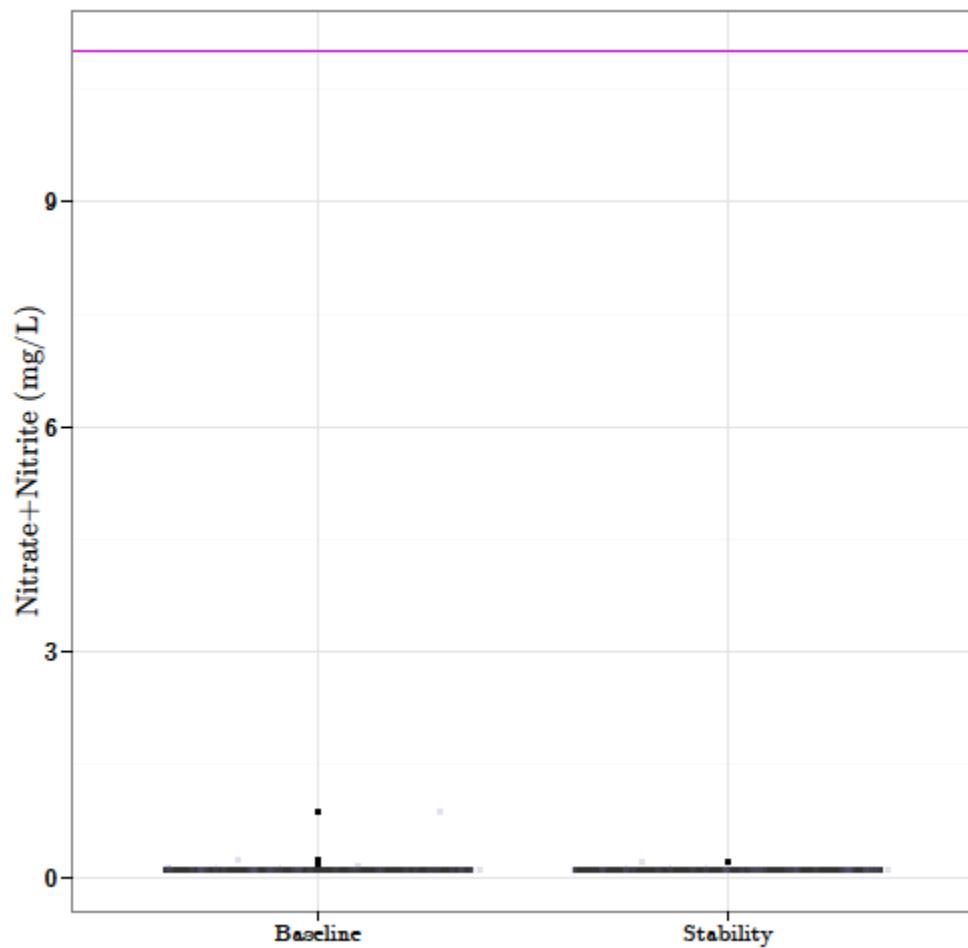
611

612 Total N - all wells



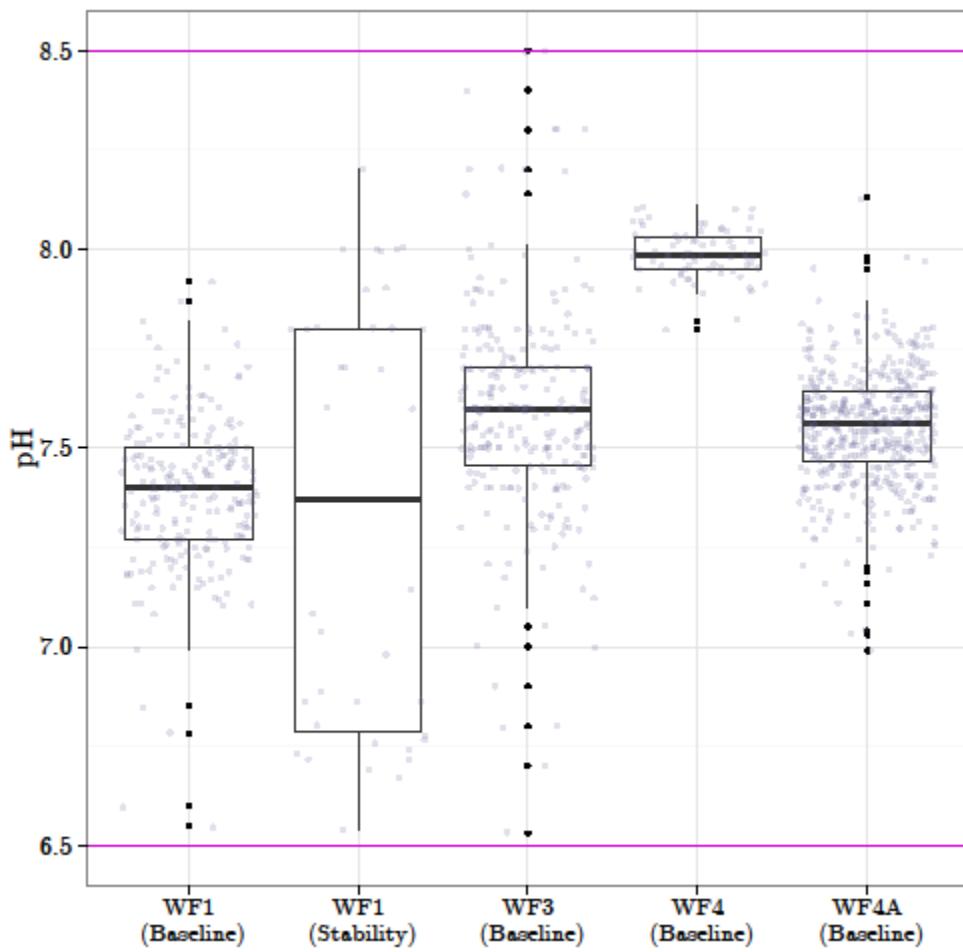
613  
614

615 Total N - matched wells



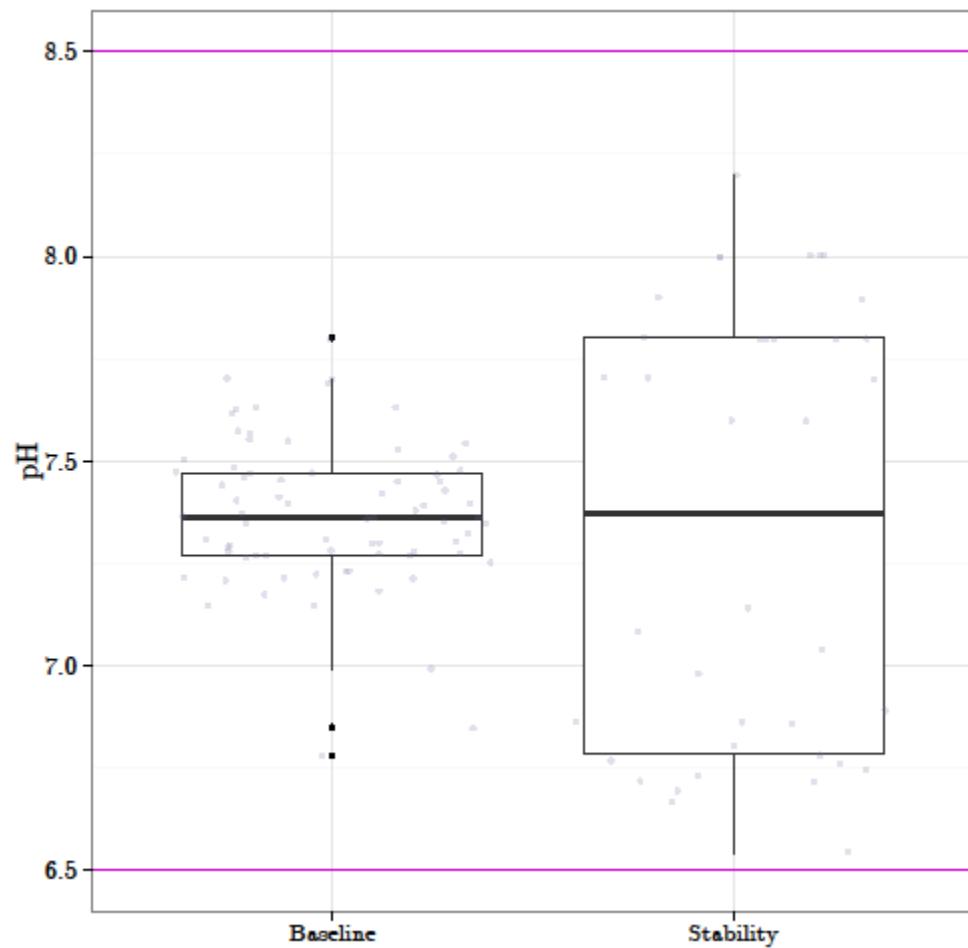
616  
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618 pH - all wells



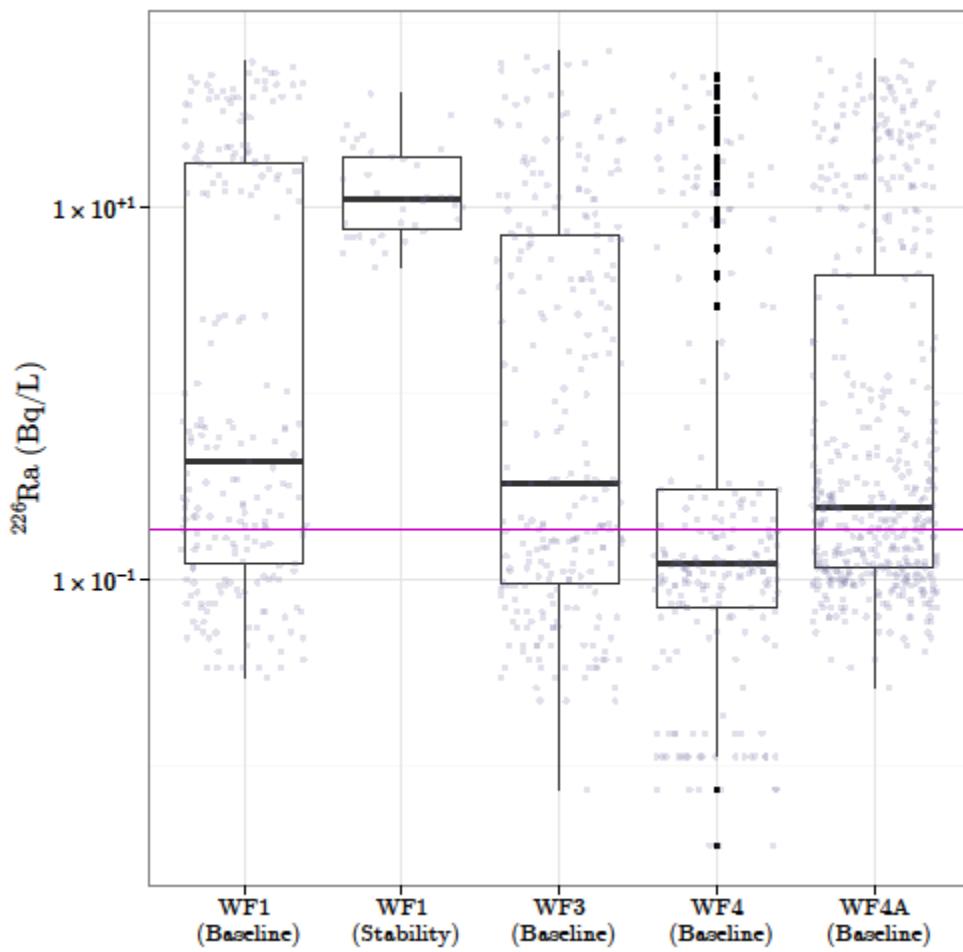
619  
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621 pH - matched wells



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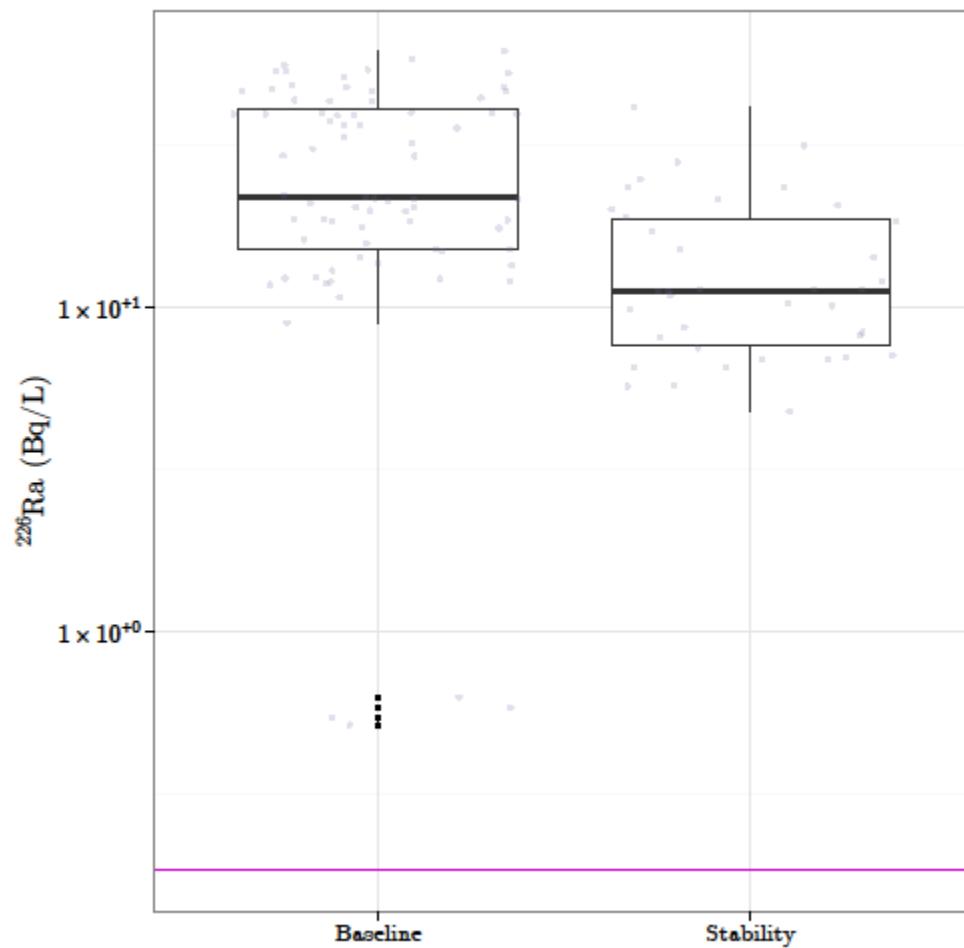
624  $^{226}\text{Ra}$  - all wells



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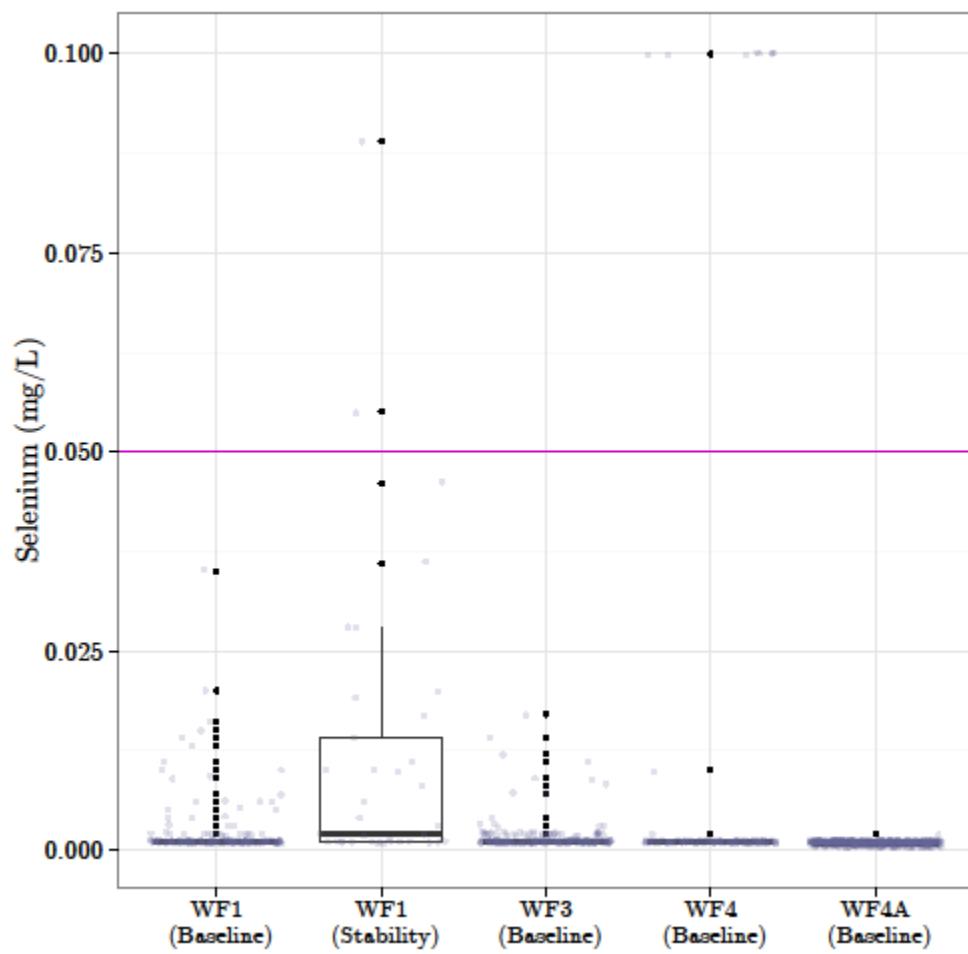
627  **$^{226}\text{Ra}$  - matched wells**



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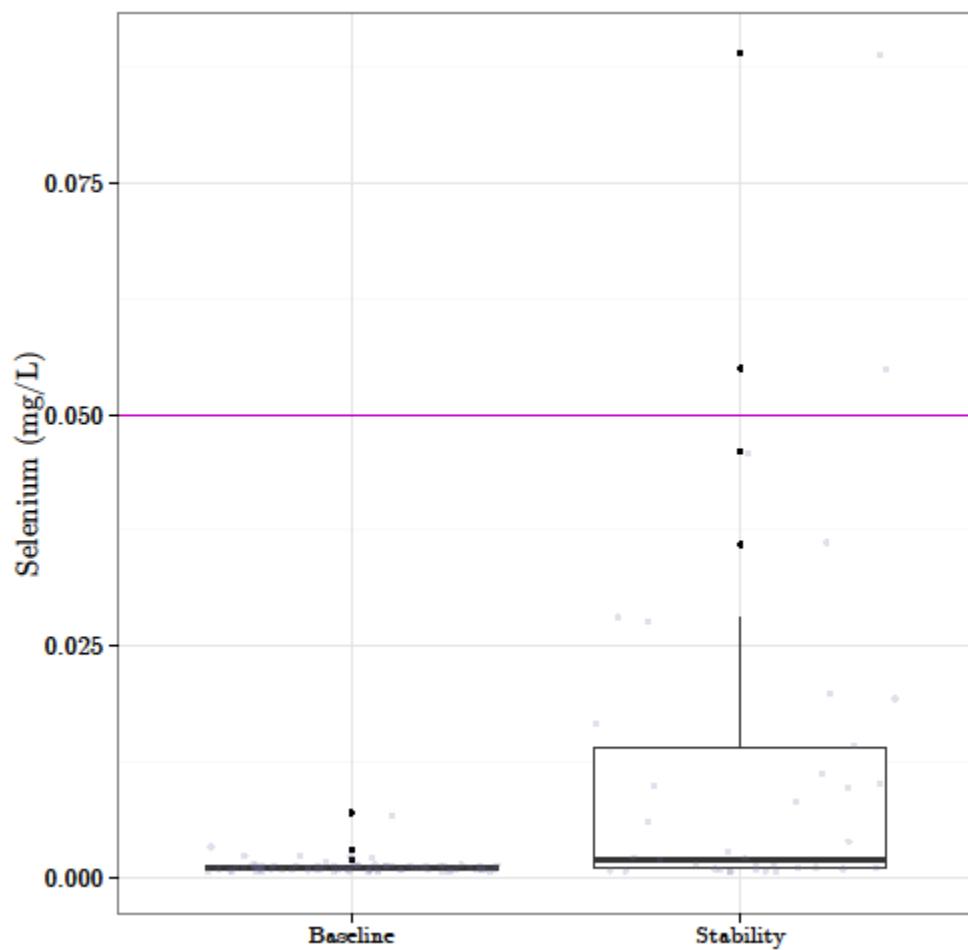
630 Se - all wells



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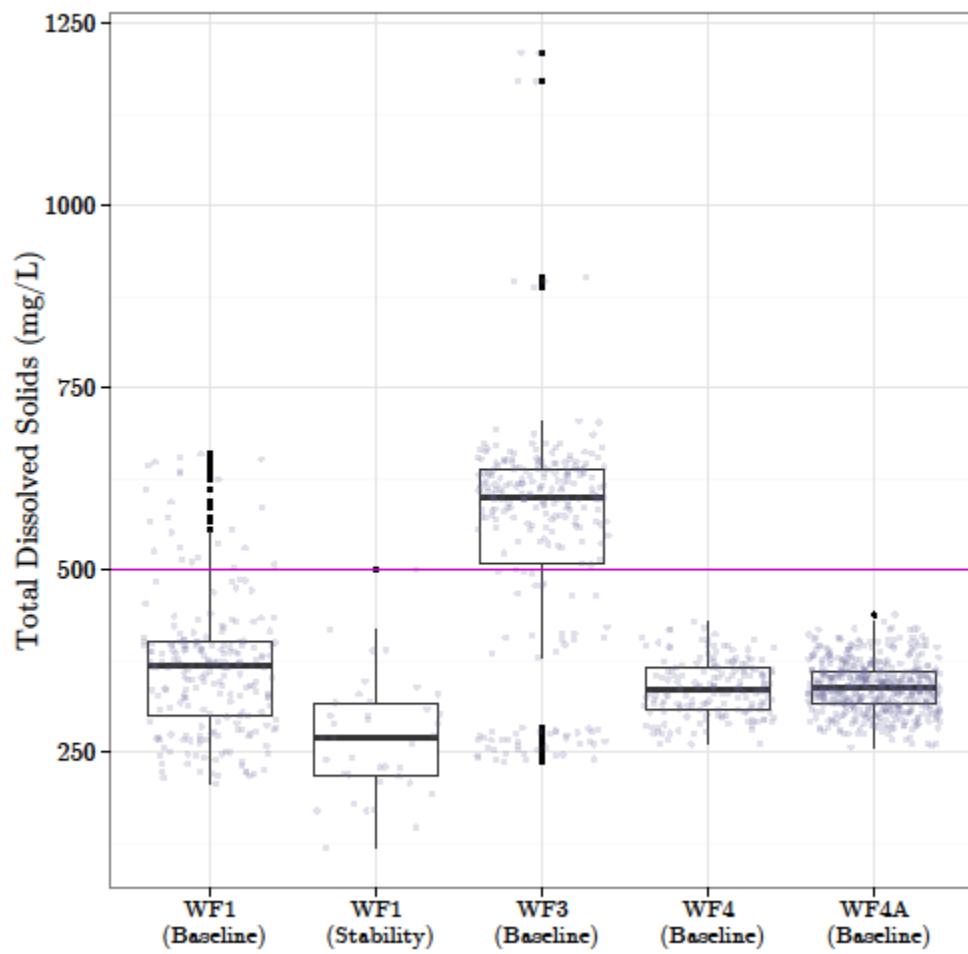
632

633 Se - matched wells



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636 TDS – all wells



637