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Op/Ed

## The truth about Coles Hill and floods

By ALAN KUHN

As an engineering and a scientific professional with more than 40 years of experience in geological engineering and hydrology and who's now a consultant for Virginia Uranium, I was dismayed by the lack of real science in a recent "technical" report released by the Blue Ridge Environmental Defense League regarding the potential impact of flooding on the proposed Coles Hill uranium mine and mill site.

The report's author, Ann Rogers, openly states, without even a pretense of objectivity, that she wrote this document as an argument against uranium mining, specifically the Coles Hill site in Pittsylvania County. Despite her lack of scientific credentials or experience, Rogers nevertheless attempted to cobble together a technical basis for her predetermined conclusion that the Coles Hill project would create a "high risk of chronic and/or catastrophic release of radioactive contamination into the aquatic environment."

To be credible, a "technical report" must be based on facts and scientific analysis. The BREDL report contains no scientific data, analysis or risk assessment to support its conclusions. Instead, the report extracts quotations from an International Atomic Energy Agency report that, when taken out

of the context, appear to be critical of current tailings containment practices. Tailings are the non-uranium bearing material that is left over from the milling process and permanently stored in state-of-the-art containment facilities at the mill site, all under the most stringent federal regulations.

However, when the reader examines the entire IAEA report, it is clear that the IAEA identified both the potential risks of uranium mining and "the usefulness of an integrated approach, involving risk assessment, technical and management measures, as well as stakeholder participation" in planning and operating uranium projects. With so much at stake, it is hard to imagine that Virginia Uranium Inc. and state and federal regulators would completely disregard this IAEA recommendation.

The BREDL study authors fail as hydrologists. They attempt to erroneously portray the Coles Hill property as a dangerously flood-prone site. The site has hills and valleys, and the valleys have creeks with floodplains and wetlands. After some heavy rains, these lowland areas are flooded. The foregoing description could apply to any "site" in Virginia or, for that matter, anywhere on Earth. That's why Virginia Uranium has explicitly stated that the company will locate its facilities on high ground, above the floodplains.

The BREDL report's Attachment A also claims to show FEMA flood zones, but those yellow lines just highlight the stream channels of Mill and Whitethorn Creeks and the Banister River; even a casual search of the FEMA website would have enabled a qualified hydrologist to identify and accurately assess the actual flood zones.

The Nuclear Regulatory Commission, the U.S. Army Corps of Engineers and U.S. Environmental Protection Agency already have safeguards in place to protect such flood zones.

A study that purports to draw attention to this or other such concerns should be based on good science and knowledge of the regulations.

Unfortunately, the BREDL study shows neither of these attributes, and, regrettably, misinforms the public and stokes unnecessary fears.

*Kuhn, who is retained on a consulting basis by Virginia Uranium, is a consultant in the siting, designing and permitting of uranium facilities.*

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