THIRD QUARTER 2009 DATA REPORT
FOR AMBIENT AIR MONITORING
ENERGY FUELS RESOURCES CORPORATION
URANIUM MILL LICENSING SUPPORT
PIÑON RIDGE MILL
MONTROSE COUNTY, COLORADO

December 22, 2009
Revision: 0

Prepared By:

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44 Union Boulevard, Suite 600
Lakewood, Colorado 80228

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1.0 INTRODUCTION

This Quarterly Report provides data required for the assessment of air quality. These data will be used to support the environmental baseline study at Energy Fuels Resources Corporation (EFR) proposed Piñon Ridge Mill (the "Site") located in Montrose County, Colorado. Twelve months of meteorological and air quality data has been collected from the second quarter 2008 to the first quarter 2009 and has been summarized in the Meteorology, Air Quality and Climatology Report, revision 1, dated October 9, 2009 and prepared by Kleinfelder. Data were collected at five air monitoring stations (network). Three stations are located on-site, with one station upwind and one downwind of the site vicinity in order to obtain a representative block of data for assessment.

The project is under the regulation of the Colorado Department of Public Health and Environment (CDPHE) and the mill license (radioactive source materials license) will be issued and administered by CDPHE. Monitoring sites were chosen according to guidance outlined in Nuclear Regulatory Commission (NRC) Regulatory Guide (Reg. Guide) 3.63 Onsite Meteorological Measurement Program for Uranium Recovery Facilities – Data Acquisition and Reporting (NRC Reg. Guide 3.63); NRC Reg. Guide 4.14 Radiological Effluent and Environmental Monitoring at Uranium Mills (NRC Reg. Guide 4.14); and Environmental Protection Agency (EPA) Meteorological Monitoring Guidance for Regulatory Modeling Applications (MMGRMA) (EPA-454/R-99-005).

The Site is located 14 miles northwest of Naturita at 16910 Highway 90, Montrose County, Colorado. The property consists of approximately 880 acres that include the Southwest ¼ of the Southeast ¼ of Section 5, all of Section 8, the North ¼ of Section 17, and the Southeast ¼ of the Northwest ¼ of Section 17, Township 46 North, Range 17 West, of the New Mexico Principal Meridian. See Figure 1 for the site layout.

2.0 PROGRAM DESCRIPTION AND MONITOR SITE DESCRIPTIONS

2.1 Ambient Air Monitoring Time Period

Based on NRC Reg. Guides 3.63 and 4.14, pre-operational particulate matter air monitoring must occur for at least twelve months prior to the submittal of the radiation permit application. This data was presented in the Meteorology, Air Quality and Climatology Report submitted with the Radioactive Material License Application on November 18, 2009. Particulate matter ≤ 10 microns (PM_{10}) samplers are located at Sites 1 and 2 and are operated under Environmental Protection Agency (EPA) sampling protocol (see Figures 1 and 2 for monitoring site locations). Tisch Hi-Vol samplers are used to monitor radionuclides at all five monitoring locations.

This report summarizes the monitoring activities conducted during the third quarter 2009 and provides data collected between July 1 and September 30, 2009.

2.2 Selection of Monitoring Sites

Selection of air monitoring station locations was based on both the pre-operational and operational air monitoring criteria set forth in NRC Reg. Guide 4.14. Three monitoring locations were selected near the Site boundaries. A fourth location was selected as a background location to the northwest and a fifth location was selected at the nearest residence located to the southeast. Wind direction is predominantly from northwest and from the southeast depending on time of day due to the presence of a down-valley/up-valley flow through the area.

The five selected monitoring locations are discussed below:

Air Monitoring Site #1: This location is also referred to as Met Site #1 and is located near the northern boundary of the Site. This location includes the 10 meter (10m) meteorological tower, one of the two on-site PM_{10} monitoring locations, and an air monitor for radionuclide sampling.

Air Monitoring Site #2: This location is also referred to as Met Site #2 and is located near the eastern boundary of the Site. This location includes the 30 meter (30m) meteorological tower, one of the two on-site PM_{10} monitoring locations, and an air monitor for radionuclide sampling.

Air Monitoring Site #3: This location is also referred to as the West Site and is located near the western boundary of the Site. This location includes an air monitor for radionuclide sampling.

Air Monitoring Site #4: This location is also referred to as the Cooper Site and is located northwest of the Site. This site is assumed to be upwind. This site will be the background site following startup of operations. This location includes an air monitor for radionuclide sampling.

Air Monitoring Site #5: This location is also referred to as the Carver Site and is located southeast of the Site. This site is assumed to be a downwind site, and was chosen as the site of the nearest residence. This location includes an air monitor for radionuclide sampling.

2.3 Locations

The Site is located at 16910 Highway 90, Montrose County, Colorado. See Table 1 and Figures 1 and 2 for locations of the monitoring sites.

Table 1
Monitor Site Locations

Site ID	UTM Zone 12 (NAD83)	
	Easting	Northing
Site #1 (North Site) – 10m Tower	695211.43	4237487.24
Site #2 (East Site) – 30m Tower	695930.42	4235452.56
Site #3 (West Site)	694443.09	4235724.28
Site #4 (Cooper Site) – Upwind Resident	691782.99	4239297.89
Site #5 (Carver Site) – Downwind Resident	700135.95	4232939.27

3.0 DATA COLLECTION AND COMPLETENESS

According to the Prevention of Significant Deterioration (PSD) regulations, the data recovery goal for meteorological data is 90% data recovery per quarter. The PSD data recovery goal for pollutant data is 80% per quarter. The minimum annual acceptable data recovery for PM_{10} data is 75% valid data.

3.1 Meteorological Data

Meteorological data were collected continuously at Sites #1 and #2 from July 1 to September 30, 2009 and are reported in Appendix A. EPA Air Quality System (AQS) data qualifiers were used to flag invalid data. Data qualifiers used for meteorological data this quarter include: BA – Maintenance/Routine Repairs, AQ – Collection Error and AT – Calibration.

Daily, weekly, and monthly checks were performed on meteorological equipment at each site according to standard operating procedures (SOPs) presented in the Energy Fuels Resources Corporation Uranium Mill Licensing Support Ambient Air Monitoring Plan Piñon Ridge Mill Site, 2008.

Site #1 includes the 10m tower and the following parameters are measured based on EPA MMGRMA guidance:

- wind speed, wind direction, and sigma theta
- vertical wind speed,
- temperature,
- relative humidity,
- delta temperature,
- barometric pressure,
- solar radiation,
- precipitation, and
- evaporation.

At the 10m level, wind speed, wind direction, sigma theta, vertical wind speed, and delta temperature are measured. At the 2m level, temperature, relative humidity, delta temperature, barometric pressure, and solar radiation are measured. At the ground level, precipitation and evaporation are measured.

Evaporation data is scheduled for collection between April 1 and October 31 of each year and was in service throughout the third quarter 2009.

Site #2 includes the 30m tower and the following parameters are measured based on EPA MMGRMA guidance:

- wind speed, wind direction, and sigma theta,
- vertical wind speed,
- temperature,
- relative humidity,
- delta temperature,
- barometric pressure, and
- solar radiation.

At the 30m level, wind speed, wind direction, sigma theta, vertical wind speed, and delta temperature are measured. At the 2m level, temperature, relative humidity, delta temperature, barometric pressure, and solar radiation are measured.

Sigma theta values for both sites are calculated from wind monitor readings. Wind gusts are measured at both of the sites. The measurement indicates the speed of the gust based on a 3-second average of the wind speed, along with the gust direction and time of the gust.

Data recovery was calculated for each parameter at both of the meteorological sites. As shown in Table 2, data completeness at Site 1 was 99.9 percent for all parameters, except for precipitation and evaporation which had data recoveries of 99.8 and 98.6 percent, respectively. Data recovery at Site 2, also shown in Table 2, was 99.9 percent for all parameters, except 2m temperature and Delta Temperature which each had data recoveries of 99.8 percent. All parameters at both sites exceeded the 90 percent data recovery requirement.

Table 2
Data Recovery for Meteorological Parameters

Meteorological Parameter	Data Recovery Site #1	Data Recovery Site #2
Wind Speed	99.9%	99.9%
Wind Direction	99.9%	99.9%
Sigma Theta Wind	99.9%	99.9%
Vertical Wind Speed EPS Avg	99.9%	99.9%
Vertical Wind Speed EPS Std	99.9%	99.9%
Vertical Wind Speed CFT Avg	99.9%	99.9%
Vertical Wind Speed CFT Std	99.9%	99.9%
2m Temperature	99.9%	99.8%
10m Temperature	99.9%	N/A
30m Temperature	N/A	99.9%
DeltaT Avg	99.9%	99.8%
Precipitation Total	99.8%	N/A
Relative Humidity Avg	99.9%	99.9%
RH Temperature Avg	99.9%	99.9%
Barometric Pressure	99.9%	99.9%
Solar Radiation Avg	99.9%	99.9%
Evaporation Level Avg	98.6%	N/A
Gust Speed	99.9%	99.9%
Gust Direction	99.9%	99.9%
Gust Time	99.9%	99.9%

N/A – Not Applicable. Sensors for 10-meter Temperatures, Evaporation, and Precipitation were not installed at Site 2. Sensors for 30-meter Temperature were not installed at Site 1.

3.2 PM_{10} Data

PM_{10} data were collected at two of the five monitoring sites (Site 1 and Site 2) following the EPA Ambient Particulate Monitoring Sample Day Schedule for 1-in-6 day sampling. PM_{10} filters were collected from the PM_{10} monitors as soon as practical following the sampling day. The samples were placed in a re-sealable plastic bags immediately following collection and stored in a secured location. The samples were shipped to Inter-Mountain Laboratories (IML) on a monthly basis under standard chain-of-custody procedures. IML analyzed the samples in accordance with their standard operating procedures (SOPs). Refer to Appendices B and C for sampling sheets and IML analytical data, respectively.

The PM_{10} sample that was scheduled to be collected on September 22, 2009 at Site 1 was not collected due to malfunction of the PM_{10} sampler. Staff attempted to collect a make-up sample on September 23, 2009, but were again unsuccessful due to sampler malfunction. A letter was sent to Ms. Nancy Chick at the CDPHE Air Pollution Control Division on October 12, 2009 notifying the Division of the missed sample.

Daily, weekly, and monthly checks were performed on the Partisol PM_{10} monitors at each site according to SOPs presented in the Energy Fuels Resources Corporation Uranium Mill Licensing Support Ambient Air Monitoring Plan Piñon Ridge Mill Site, 2008.

Data recovery was calculated for each site. Site 1 had 93 percent data recovery and Site 2 had 100 percent data recovery. Each site exceeded the 75 percent requirement for data recovery (Table 3).

Table 3
Data Recovery for PM_{10} Samples

	Site 1	Site 2
Total Number of Samples per Quarter	15	15
Number of Valid Samples Collected	14	15
Data Recovery	93.3%	100%

3.3 Radionuclide Data

Filters for radionuclide data analysis were collected at each of the five monitoring sites (Sites 1, 2, 3, 4, and 5). Hi-Vol monitors were run continuously on a 14-day filter exchange schedule. Filters were collected and immediately placed in sample filter envelopes and into re-sealable plastic bags and stored in a secured location. The samples were shipped to ACZ Laboratories (ACZ) at the end of the quarter under standard chain-of-custody procedures. ACZ composited the sample filters by quarter and analyzed the samples in accordance with their SOPs. Refer to Appendices B and D for sampling sheets and ACZ analytical data, respectively.

ACZ Labs reports a concentration of analyte per composited filter set. The average air flow rate was calculated for each filter exposure period based on the calibration values of the samplers and average stagnation pressure, temperature and pressure during the filter exposure period. The formula used to calculate the average air flow is:

$$\text{Average Flow Rate } (m^3/\text{min}) = \frac{\left(\frac{P_a - P_{stag}}{P_a} - b\right) \times \sqrt{T_a + 273.15}}{m}$$

Where:
P_a = Average ambient pressure (inches Hg) (averaged over individual filter exposure periods)
T_a = Average ambient temperature (°C) (averaged over individual filter exposure periods)
P_{stag} = Average stagnation pressure (inches Hg) (measured at sample start and end)
b = Sampler calibration intercept value (unitless)
m = Sampler calibration slope value (unitless)

The air sample volume for each filter was calculated based on the average flow rate and time of exposure and the total air volume for each composited sample was calculated as the sum of the air sample volume of each filter included in the composite. Refer to Appendix D for a summary of the above calculations.

Daily, weekly, and monthly checks were performed on the Tisch Hi-Vol monitors at each site according to SOPs presented in the Energy Fuels Resources Corporation Uranium Mill Licensing Support Ambient Air Monitoring Plan Piñon Ridge Mill Site, 2008.

All five sites had a data recovery that exceeded the 80 percent data recovery requirement for pollutant data (Table 4).

Table 4
Data Recovery for Radionuclide Samples

	Site 1	Site 2	Site 3	Site 4	Site 5
Total Run Time (hours)	2209.7	2209.6	2203.0	2196.0	2193.8
Actual Run Time (hours)	2198.1	2203.3	2199.6	2191.1	2188.7
Data Recovery	99.5%	99.7%	99.8%	99.8%	99.8%

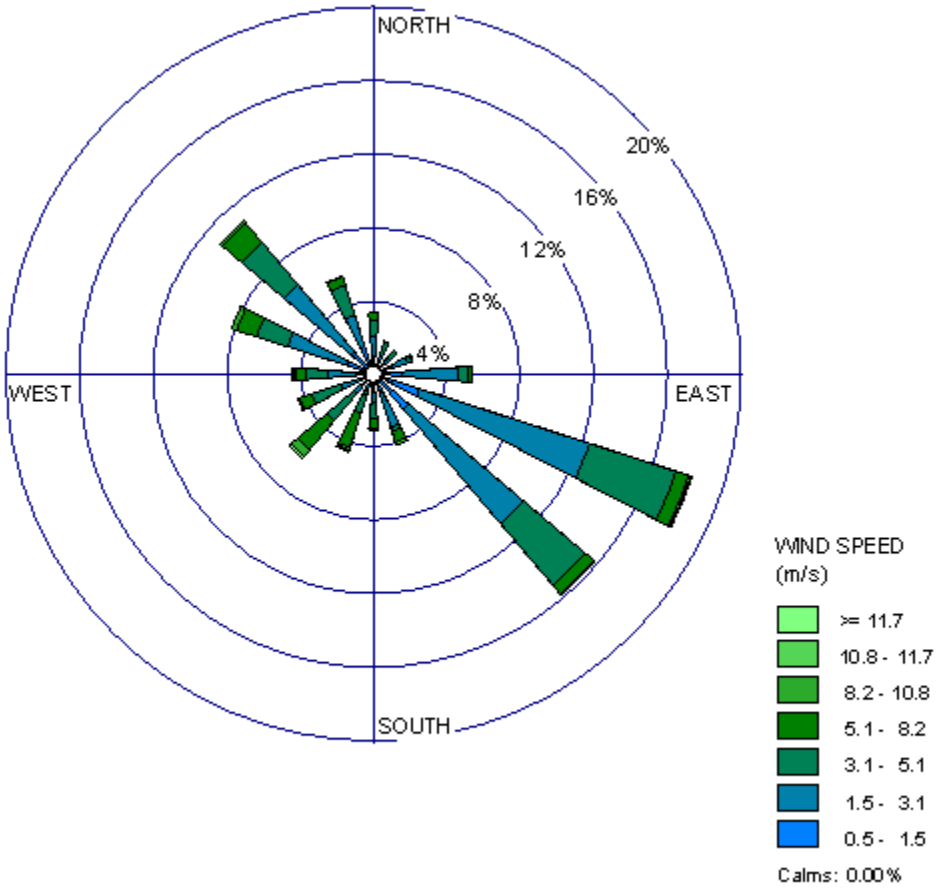
4.0 METEOROLOGICAL DATA ANALYSIS

The monthly averages of meteorological parameters are summarized in Table 5.

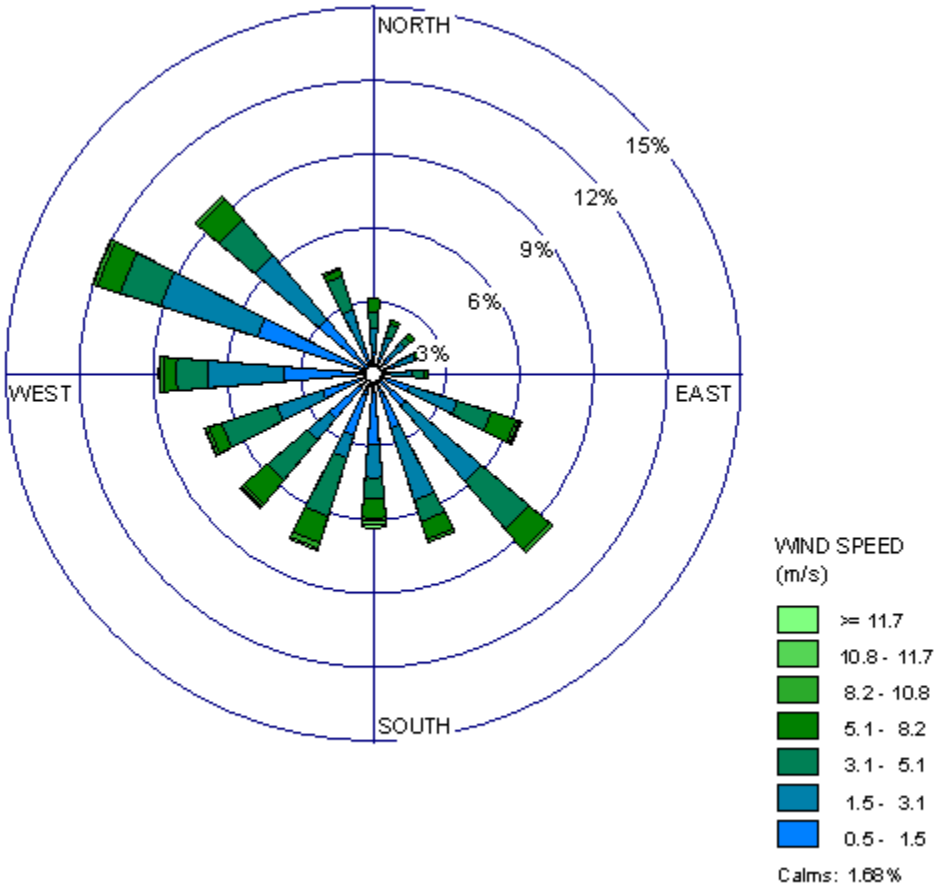
Table 5
Monthly Average Meteorological Parameters

	July		August		September	
Meteorological Parameter	**Site #1**	**Site #2**	**Site #1**	**Site #2**	**Site #1**	**Site #2**
Wind Speed (m/s)	3.03	2.93	3.27	3.01	3.02	2.88
Wind Direction (deg)	121.05	257.00	171.31	229.10	141.30	227.09
Sigma Theta Wind	29.03	30.67	27.74	30.90	29.05	31.53
Vertical Wind Speed EPS (cm/s)	3.43	8.35	3.23	7.03	3.16	8.17
Vertical Wind Speed EPS Std	21.29	35.37	22.68	39.58	21.54	36.04
Vertical Wind Speed CFT (cm/s)	6.05	13.90	8.75	14.94	7.07	15.11
Vertical Wind Speed CFT Std	22.49	39.69	23.84	43.88	22.60	40.27
2m Temperature (ºC)	24.63	25.16	23.23	23.57	18.25	18.49
10m Temperature (ºC)	25.22	N/A	23.64	N/A	18.66	N/A
30m Temperature (ºC)	N/A	25.64	N/A	24.07	N/A	19.10
DeltaT (ºC)	0.60	0.48	0.41	0.49	0.41	0.61
Relative Humidity (%)	29.09	27.74	22.94	21.91	39.58	38.51
RH Temperature (°F)	77.28	78.09	74.33	75.24	65.36	66.11
Barometric Pressure (in. Hg)	24.67	24.60	24.67	24.61	24.69	24.62
Solar Radiation (W/m^2)	303.51	296.15	283.09	276.24	226.49	220.80
Gust Speed (m/s)	6.44	6.51	6.82	6.83	6.43	6.45
Gust Direction (deg)	98.42	277.86	151.64	226.86	128.08	220.73
Total Precipitation (in.)	0.93	N/A	0.05	N/A	0.55	N/A
Total Evaporation (in.)	10.71	N/A	10.44	N/A	6.02	N/A
Average Daily Evaporation (in.)	0.35	N/A	0.34	N/A	0.20	N/A

The wind roses for Sites 1 and 2 are shown below. As can be seen in the Site 1 wind rose below, the wind direction at the 10 m tower site (Site 1) is predominantly from the southeast, with less frequent, yet still prominent northwest and southwest components. The southeast/northwest wind directions depict the down-valley/up-valley flow through the area. The wind direction at the 30m tower site (Site 2 wind rose, below) is distributed predominantly from the northwest with significant southeast and southwest components.



Site 1: 10m Wind Rose



Site 2: 30m Wind Rose

5.0 AIR QUALITY ANALYSIS

The EFR Monitoring Program collected data to examine both PM_{10} and radionuclide trends at the Mill Site. Mill Site area concentrations were calculated from the data at the monitoring sites and the results were less than federal and state standards and recognized national averages.

5.1 PM_{10} Data Summary

The PM_{10} concentrations are summarized in Table 6. The results summarized in Table 6 are provided in both standard temperature and pressure (STP) and local (or actual) temperature and pressure (LTP). Reporting of PM_{10} data is required to be in LTP. The monthly and annual averages are presented in Table 6.

Table 6
PM_{10} Concentrations

	STP Concentration ($\mu g/m^3$)		LTP Concentration ($\mu g/m^3$)	
Sample Date	**Site #1**	**Site #2**	**Site #1**	**Site #2**
July 6, 2009	2	8	2	7
July 12, 2009	2	10	2	8
July 18, 2009	13	14	11	11
July 24, 2009	12	12	10	10
July 30, 2009	13	11	11	9
August 5, 2009	11	11	9	9
August 11, 2009	18	16	15	13
August 17, 2009	10	10	9	8
August 23, 2009	11	7	9	6
August 29, 2009	12	11	10	9
September 4, 2009	27	15	22	13
September 10, 2009	8	8	6	7
September 16, 2009	7	6	6	5
September 22, 2009	NC	5	NC	4
September 28, 2009	15	14	13	12
July Average	**8**	**11**	**7**	**9**
August Average	**12**	**11**	**10**	**9**
September Average	**14**	**10**	**12**	**8**

NC – Not Collected

Increases in PM_{10} concentrations for short periods of time may be attributed to several wild fires during the third quarter 2009. The following wild fires could have contributed to elevated PM_{10} concentrations at the mill site:

- The Grammar Fire started on July 14 , 2009 near Norwood, Colorado, approximately 27 miles southwest of the site.
- The Narraguinnep Fire started on August 7, 2009 near Dove Creek, Colorado, approximately 34 south of the site.
- The Station Fire started on August 26, 2009 near Los Angeles, California. The affects of this fire were noted as hazy skies and loaded hi-volume particulate filters during the September 9 site visits.
- The Tabeguache Fire started on August 29, 2009 north of Nucla, Colorado, approximately 12 miles from the site.

5.2 Radionuclides

The third quarter 2009 radionuclide monitoring data for EFR Sites 1, 2, 3, 4, and 5 are presented in Table 7. The samples for each site were collected continuously throughout the quarter and were analyzed for concentrations of Uranium, Lead-210, Radium-226, and Thorium-230.

Table 7
Radionuclide Concentrations

EFR Sites	Uranium	Lead-210	Radium-226	Thorium-230
	µg/liter	ρCi/liter	ρCi/liter	ρCi/liter
Site 1	$<6.2 \times 10^{-9}$	3.4×10^{-6}	1.6×10^{-9}	1.1×10^{-9}
Site 2	$<6.3 \times 10^{-9}$	3.4×10^{-6}	3.4×10^{-9}	-1.4×10^{-9}
Site 3	6.3×10^{-9}	3.4×10^{-6}	3.8×10^{-9}	6.9×10^{-9}
Site 4	$<6.2 \times 10^{-9}$	2.8×10^{-6}	3.2×10^{-9}	-5.5×10^{-9}
Site 5	$<7.0 \times 10^{-9}$	2.7×10^{-6}	1.6×10^{-9}	-6.0×10^{-9}

As shown in Table 7, some radionuclides have results less than zero. The negative concentrations are a result of quality control procedures by the analyzing laboratory. Occasionally, field samples have a lower radionuclide count than the laboratory blank sample used to set the “zero” point, thus, some samples have a negative concentration. Presenting negative concentrations rather than data qualifiers allows for temporal trend analysis of the data and is consistent with Section 7.5 of the United States Nuclear Regulatory Commission’s Regulatory Guide 4.14. Therefore, the negative concentrations presented in Table 7 are acceptable representation of the radionuclide concentrations collected in the Mill Site Area.

6.0 QUALITY ASSURANCE PROGRAM

6.1 Quarterly Calibrations

Calibrations were performed on particulate matter equipment on July 14-15, 2009 by EFR personnel. A copy of the EFR Calibration Report is included in Appendix E. Calibrations of meteorological instruments were performed on July 15, 2009 by IML. A copy of the IML Calibration and Quality Assurance Audit Report is included in Appendix F.

6.2 Independent Quarterly Audit Program

Independent auditing on the particulate matter equipment was performed by IML on July 15, 2009. A copy of the IML Calibration and Quality Assurance Audit Report is included in Appendix F.

6.3 Internal Quality Control Procedures

In the event of any operational errors or missed sampling events, a corrective action procedure is implemented. The quality assurance manager for the site will investigate the cause and effect of the incident, take corrective action, and prepare a letter to the CDPHE Air Pollution Control Division (APCD) and the Radiation Management Unit (RMU), as necessary.

One equipment malfunction led to a missed PM_{10} sample at Site 1 on September 22, 2009. The error indicated that the flow rate fell below the required rate and the sampler terminated the sample run early as a result. The parameters on the unit were verified and a make-up sample was programmed to run on September 23. The make-up sample encountered a similar error and failed to be collected as well. A new make-up sample was unable to be run prior to the next scheduled sample run day and the sample event was missed. The unit did collect a valid sample on September 29 without any error. However, several subsequent sample runs failed due to similar unit malfunctions in October and November 2009. The corrective actions taken during that period will be discussed in the Fourth Quarter 2009 Data Report.

7.0 PERSONNEL

Project staff and their respective roles are detailed in Table 8. The overall project organization is shown schematically in the Project Organization Chart below.

Program administration, management, and quality assurance is performed by Energy Fuels Resources personnel. The Air Monitoring Team Leader will provide onsite oversight and will assist the field team with technical, operational, or other project-related issues. Meteorological equipment calibrations and audits and ambient air monitoring audits are performed by IML Air Science. Technical support is provided by Kleinfelder West, Inc (KLF).

Project Organization Chart

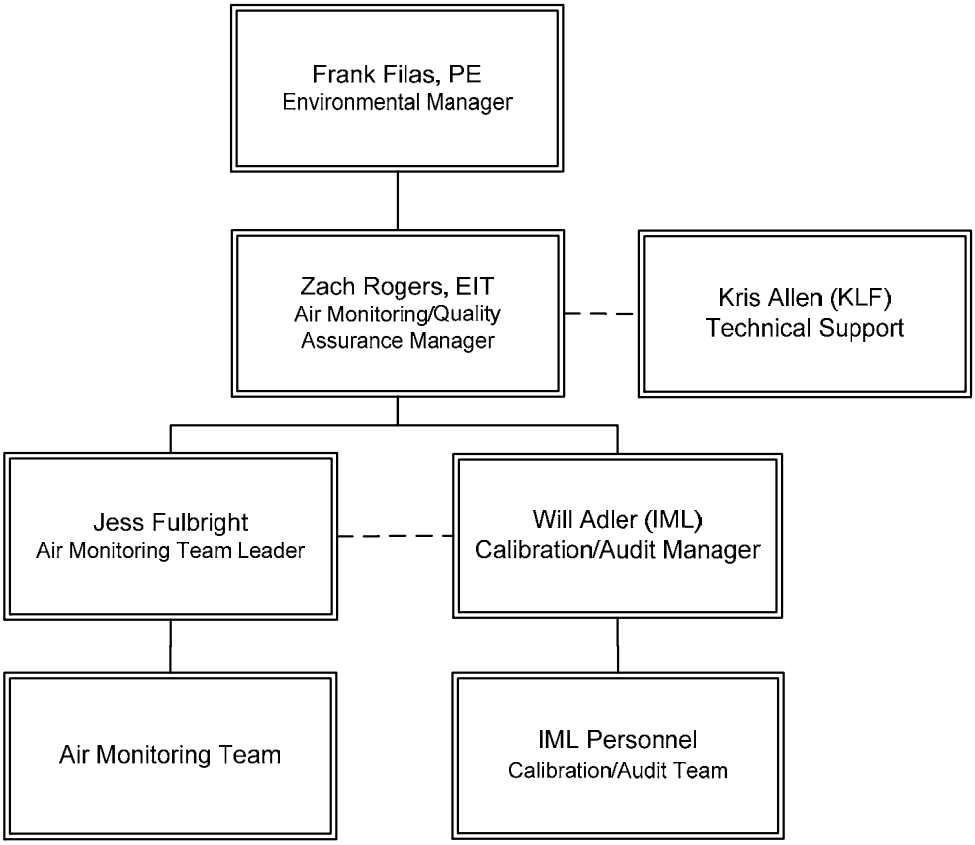


Table 8
Roles and Responsibilities

Name	Project Role	Responsibilities	Experience
Frank Filas, PE	Environmental Manager	Program Management	Engineering, Licensing, Operations Management
Zach Rogers, EIT	Air Monitoring/Quality Assurance Manager	Project Management, Quality Assurance, Report Preparation	Project Management, Field Operations, Air Quality, Quality Control, Meteorology
Jess Fulbright	Air Monitoring Team Leader/ Health & Safety Officer	Field Operations Management, Sampling, Health & Safety Compliance	Field Operations, Health & Safety Compliance
EFR Personnel	Air Monitoring Team	Sampling	Field Operations
Will Adler (IML)	Calibration/Audit Project Manager	Project Management, Field Work/Calibration/ Audit	Project Management, Meteorology, Air Quality, Ambient Air Quality Modeling
IML Personnel	Calibration/Audit Team	Field Calibrations and Audits	Meteorology, Air Quality, Ambient Air Quality Modeling
Kris Allen, EIT (KLF)	Technical Support	Field Management, Air Quality Project Management	Air Quality, Field Management, Meteorology

8.0 STANDARDS AND REFERENCES

Colorado Department of Public Health and Environment (CDPHE), 2001. Ambient Air Monitoring Requirements for the Air Pollution Control Division of the Colorado Department of Public Health and Environment, Technical Services Program Air Pollution Control Division, April.

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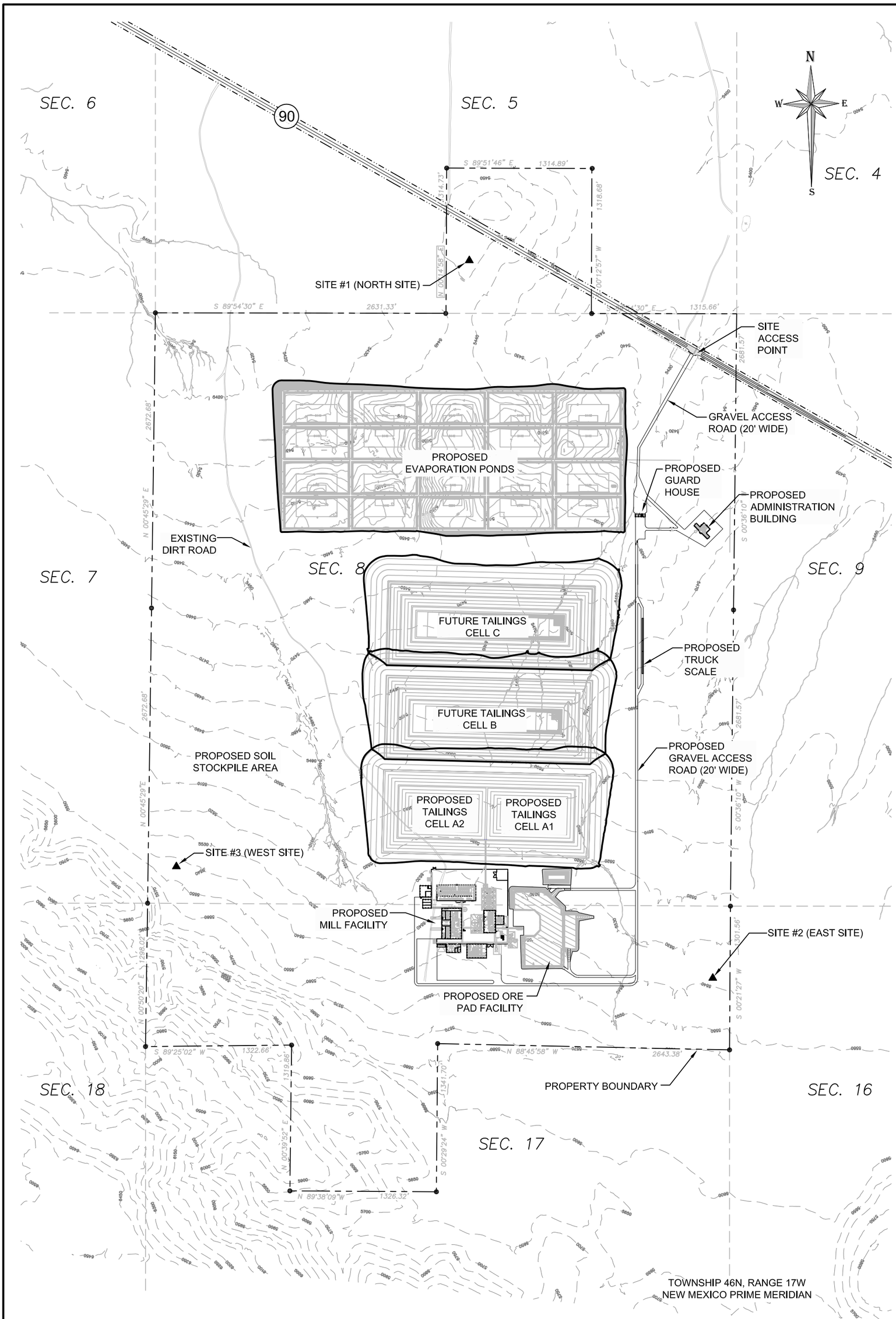
FIGURES



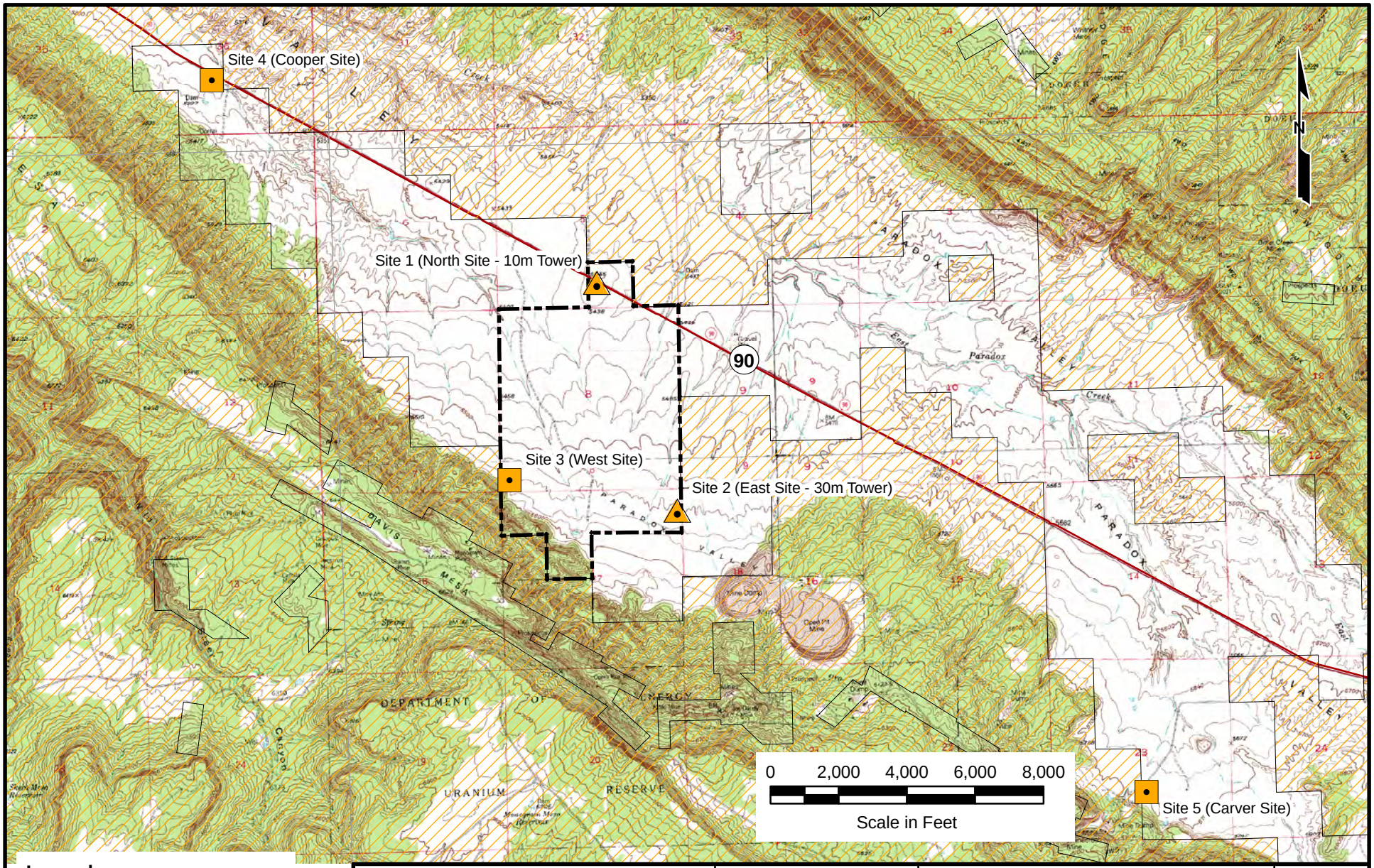
Energy Fuels Resources Corporation

FIGURE 1

PIÑON RIDGE MILL
SITE LAYOUT

Scale	Created	Drawn by
1" = 800'	June 2, 2009	ZTR

N:\Environmental\Mill Permitting\Baseline Studies\Air Monitoring Stations\Quarterly Reports\1Q09 Report\FIgISiteLayout.dwg



Legend

- Air Sampler Only
- Meteorological Tower and Air Samplers
- Project Boundary
- BLM Land

Energy Fuels Resources Corporation

PROJECT	Pinon Ridge
DRAWN:	6/3/09
DRAWN BY:	Z Rogers
CHECKED BY:	F Filas
FILE NAME:	Figure2_SamplerLocationMap_060209.mxd

Air and Meteorological Site Location Map

ENERGY FUELS RESOURCES
PIÑON RIDGE MILL SITE
MONTROSE COUNTY, COLORADO

ORIGINATOR:	Z Rogers
APPROVED BY:	F Filas

FIGURE

2