

STATE OF COLORADO

Bill Ritter, Jr., Governor
Martha E. Rudolph, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department
of Public Health
and Environment

February 19, 2010

Mr. Frank Filas
Environmental Manager
Energy Fuels Resources Corporation
44 Union Blvd – Ste. 600
Lakewood, CO 80128

Subject: Air Permit Application
Reasonably Available Control Technology (RACT) Determination for the Piñon Ridge Uranium Mill.
(Permits 09MO0945 through 09MO0952, AIRS ID 085/0971/001-020)

Dear Mr. Filas:

The Division's preliminary review of the RACT determination has produced further questions:

A statement is made in the determination that most of the Volatile Organic Compounds (VOCs) will remain entrained in the tailings. Is there a technical basis for this assumption? Unless this can be demonstrated, the Division will assume that all organic compounds going to the tailings pond(s) will be emitted.

The Division needs more detail on why each of the Process Control technologies in the RACT Analysis, were determined to be technologically infeasible.

For the Steam Stripping technology, what technical information supports the statement that emulsified crud is not suitable for steam stripping. What "extensive pretreatment" would be required?

Currently some oil and gas facilities are utilizing dissolved air floatation and enhanced separation processes for produced water evaporation ponds. Please review these technologies for RACT for your proposed facility.

The application will be on hold until receipt of the requested information, at which time processing will continue.

Sincerely,

Charles N. Pray, P.E.-P.L.S.
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cc: file

Mr. Kris Allen (Kleinfelder), e-mail

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