

STATE OF COLORADO

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Colorado Department
of Public Health
and Environment

Zach Rogers
Environmental Engineer
Energy Fuels Resources Corporation
44 Union Boulevard, Suite 600
Lakewood, Colorado 80228

August 20, 2010

Dear Mr. Rogers,

I have received the recent quarterly monitoring reports for the Pinon Ridge Mill Site in Montrose County, Colorado. I have a few questions and comments.

1. Quarter 2, 2009 Report, Site 1 Hourly Meteorological Data File

In the Site 1 hourly data file, values start appearing in Column AA after June 1, 2009. This column is not labeled. What are these values?

2. Quarter 2, 2009 Report, Appendix D, Radionuclide Values

For Appendix D9, Page 1, Site 1 filter calculations, the 18,000 minute sampling time for the 6/16/09 filter date does not agree with the 21,600 minute sampling time shown on Page 1 of Appendix D8.

For Appendix D9, Page 2, Site 2 filter calculations, the 21,030 minute sampling time for the 6/16/09 filter date does not agree with the 21,390 minute sampling time shown on Page 2 of Appendix D8.

3. Quarter 3, 2009 Report

This report was very thorough. I have no questions or comments concerning it.

4. Quarter 4, 2009 Report, Table 6.

The values in Table 6, PM₁₀ Concentrations, appear to be reversed, with the Site 1 column listing results from Site 2, and the Site 2 column listing results from Site 1. (Compare this table to Table 3, Data Recovery, and the Tables in Appendix C). If you concur with this comment, please issue a new page 12 for the report.

5. Quarter 4, 2009 Report, Appendix D8_Tisch Hi Vol Flow Calculations 4Q09 Data Sheet

There appear to be a few inconsistencies in this spreadsheet, when compared to the rest of the report.

Site 1

The run time for the November 27 – December 15, 2009 sample filter is given as 146.0 hours here. The Field Form in Appendix B gives the run time as 67.8 hours. According to my calculations, the run time should have been about

431 hours. Which of the figures, 67.8 or 146, is correct? In any case, there appears to be too much sample run time lost for this filter.

For the December 15, 2009 through January 1, 2010 sample, the sampler m (slope) and sampler b (intercept) factors appear to be taken from the January 16, 2010 calibration. I believe this sample should use the same slope and intercept as used in the columns above it.

Site 4

In Appendix D8, the run time for the October 1 – October 16, 2009 sample is given as 290.4 hours. This does not agree with the field data sheet in Appendix B. The field data sheet lists a run time of 362.0 hours.

All Sites, October 1 – October 16, 2009 Samples

Site 4 appears to use the July 15, 2009 calibration slope and intercept to calculate results. All the other sites use the October 16, 2009 calibration slope and intercept to calculate the October 1 – 16 sample flows. I believe the July 15, 2009 calibration factors should be used for all October 1 – October 16 samples.

6. Quarter 1, 2010 Report, Table 5.

This table lists meteorological parameters from the Fourth Quarter of 2009. It needs to be updated to reflect the First Quarter 2010 period. Please send a revised copy.

7. Quarter 1, 2010 Report, Appendix C.

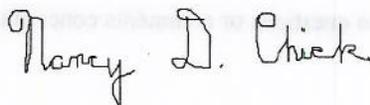
The sampler 1-2 table lists an actual volume of 24.00 m³ for the January 2, 2010 sample. However, the field data sheet in Appendix B gives the volume sampled as 24.7 m³.

8. Quarter 2, 2010 Report, Page 1.

There is an error on this page. One sentence reads: "Meteorological and ambient air quality data were collected at five air monitoring stations (network) from the second quarter 2008 through the first quarter 2009, comprising 24 months of data" I believe the second year cited should be 2010.

Thank you for submitting these reports. This letter does not include comments from the Radiation Management Section, Hazardous Materials and Waste Management Division. Mr. Phil Egidi may have additional comments.

Sincerely,



Nancy D. Chick
Environmental Protection Specialist
Air Pollution Control Division

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Cc: R.K. Hancock, SSP Permit files
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