

**Response to Attachment 4, Part 2 Comments on Energy Fuels Resources Piñon Ridge Mill
Emergency Response Plan (Vol. 12; Exhibit J5)**

Comment #	Section	Response
215.	1.2, 2.1	Refer to redline changes throughout the plan in Exhibit 3.
216.	Table 3	Wording describing the potential for incidents to occur concurrently (such as a chemical spill as a result of a fire/explosion or severe weather) was included in Section 1.3. Also, wording was included in “Chemical Spill” row of Table 3 to include chemical spills as a result of other incidents. Refer to redline changes in Table 3 and Section 1.3 of the plan.
217.	Table 3	As sabotage/terrorism would not be a type of incident, but instead a initiating cause of an incident(s), it was not added to Table 3. Refer to redline changes in Section 1.3 of the plan for a brief discussion of sabotage/terrorism as a potential initiating cause of an incident and Sections 4.1, 4.2, 4.4, 4.5, 4.7, and 9.0 for discussion regarding collection of evidence for such events.
218.	1.3.3	Refer to redline changes in Section 1.4.3 of the plan
219.	Table 5	Refer to redline changes in Table 5 of the plan
220.		Refer to redline changes in Section 5.1.1 of the plan
221.	5.2	Modeling of potential accident scenarios was performed by SENES and documented in the Risk Assessment. Protective actions discussed in Sections 4.1-4.7 and 5.0 were developed with the Risk Assessment in mind. Refer to redline changes in Sections 1.3 and 5.2 of the plan reinforcing this relationship.
222.	5.3.3	Procedures in the Health and Safety Plan that were referenced in the Emergency Response Plan were reviewed and, where appropriate, edits were made to the procedures to integrate with the requirements of the ERP. The edits to the procedures are presented in Exhibit 4 of this submittal. These edits are in addition to the Health and Safety Plan edits submitted to CDPHE on October 18, 2010.
223.	6.5.2	Refer to redline changes in Section 6.5.2 of the plan
224.	6.5.3	Refer to redline changes in Section 6.5.3 of the plan
225.		Refer to redline changes in Section 7.3 of the plan
226.	Appendix A	Refer to redline changes in Appendix A of the plan
227.	Appendix B	Refer to redline changes in Appendix B of the plan
228.		Refer to redline changes in Sections 4.1-4.7 and 9.0 of the plan
229.		Bullet 1: Refer to redline changes in Section 1.1 and Table 1 of the plan Bullet 2: Refer to redline changes in Sections 1.3.1-1.3.7 of the plan Bullet 3: Refer to redline changes in Section 5.0 and existing preplanned actions for each type of incident in Sections 4.1-4.7 of the plan Bullet 4: Refer to redline changes in Sections 4.1-4.7 and 9.0 of the plan

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230.		A number of local emergency planning organizations and other emergency response organizations were consulted and provided input during the preparation of this plan, including the Nucla/Naturita and Paradox Fire Departments, Montrose County Sheriff's Office, Basin Clinic, St. Mary's Hospital, Montrose Memorial Hospital, BLM, Montrose LEPC, Colorado State Patrol, Utah Highway Patrol, Colorado DOT, Utah DOT, and CDPHE. The local emergency planning organizations will be asked to review the plan and provide input prior to start-up of Mill construction and operations.
231.		The complete plan with redlines is included with Exhibit 3 of this submittal. A current version of the plan without redlines is also provided on the included data CD.
Verbal		Refer to redline changes in Section 6.2 of the plan incorporating quarterly review of contact information for off-site emergency responders