

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

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1.0 INTRODUCTION

This quarterly report provides data required for the assessment of air quality. These data collected during the fourth quarter 2009 will be used to augment 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 was collected from the second quarter 2008 to the first quarter 2009 and was subsequently 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 $\frac{1}{4}$ of the Southeast $\frac{1}{4}$ of Section 5, all of Section 8, the North $\frac{1}{4}$ of Section 17, and the Southeast $\frac{1}{4}$ of the Northwest $\frac{1}{4}$ 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 (PM₁₀) samplers are located at Sites 1 and 2 and are operated under 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 fourth quarter 2009 and provides data collected between October 1 and December 31, 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 PM₁₀ 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 PM₁₀ 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 PM₁₀ data is 75% valid data.

3.1 Meteorological Data

Meteorological data were collected continuously at Sites #1 and #2 from October 1 to December 31, 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, AZ – Audit, and IL – Seasonally Out of Service.

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. The Evaporation Pan was taken off line on November 2, 2009. The IL data qualifier was used for the period when the evaporation pan was out of service for the season.

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 between 98.2 and 99.9 percent for all parameters, except for evaporation which had data recovery of 85.9 percent. The reduced recovery for evaporation data is due to several suspected freezing events and the shortened data collection period. Data recovery at Site 2, also shown in Table 2, was between 98.7 and 99.8 percent for all parameters. All parameters at both sites exceeded the 90 percent data recovery requirement with the exception of the evaporation data. However, the evaporation data recovery for the year does exceed the 90 percent data recovery requirement at 97.2 percent.

**Table 2
Data Recovery for Meteorological Parameters**

Meteorological Parameter	Data Recovery Site #1	Data Recovery Site #2
Wind Speed	99.0%	98.7%
Wind Direction	99.0%	98.7%
Sigma Theta Wind	99.0%	98.7%
Vertical Wind Speed EPS Avg	99.2%	99.8%
Vertical Wind Speed EPS Std	99.2%	99.8%
Vertical Wind Speed CFT Avg	98.2%	99.8%
Vertical Wind Speed CFT Std	98.2%	99.8%
2m Temperature	99.9%	99.8%
10m Temperature	99.9%	N/A
30m Temperature	N/A	99.8%
DeltaT Avg	99.9%	99.8%
Precipitation Total	99.8%	N/A
Relative Humidity Avg	99.9%	99.8%
RH Temperature Avg	99.9%	99.8%
Barometric Pressure	99.9%	99.8%
Solar Radiation Avg	99.9%	99.8%
Evaporation Level Avg	85.9%	N/A
Gust Speed	99.0%	98.7%
Gust Direction	99.0%	98.7%
Gust Time	99.0%	98.7%

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 PM₁₀ Data

PM₁₀ 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. PM₁₀ filters were collected from the PM₁₀ monitors as soon as practical following the sampling day. The samples were placed in 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 PM₁₀ sample unit located at Site 1 experienced intermittent problems from late September through early November 2009. The sampler malfunctions led to several sample runs that were aborted early due to flow rate errors. Five samples were missed in the fourth quarter 2009. One make-up sample was successfully collected, however, make-up sample attempts for the remaining four aborted sample runs were also unsuccessful. A letter was sent to Ms. Nancy Chick at the CDPHE Air Pollution Control Division on December 9, 2009 notifying the Division of the missed samples and summarizing the actions taken to resolve the issues.

Daily, weekly, and monthly checks were performed on the Partisol PM₁₀ 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 80 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 PM₁₀ Samples**

	Site 1	Site 2
Total Number of Samples per Quarter	15	15
Number of Valid Samples Collected	12	15
Data Recovery	80%	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). High-volume (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:

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

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 data recovery that exceeded the 80 percent data recovery requirement for pollutant data and is summarized in Table 4.

Table 4
Data Recovery for Radionuclide Samples

	Site 1	Site 2	Site 3	Site 4	Site 5
Total Run Time (hours)	1926.0	2210.6	2213.5	2131.5	2212.4
Actual Run Time (hours)	2214.6	2215.2	2215.1	2213.6	2213.8
Data Recovery	87.0%	99.8%	99.9%	96.3%	99.9%

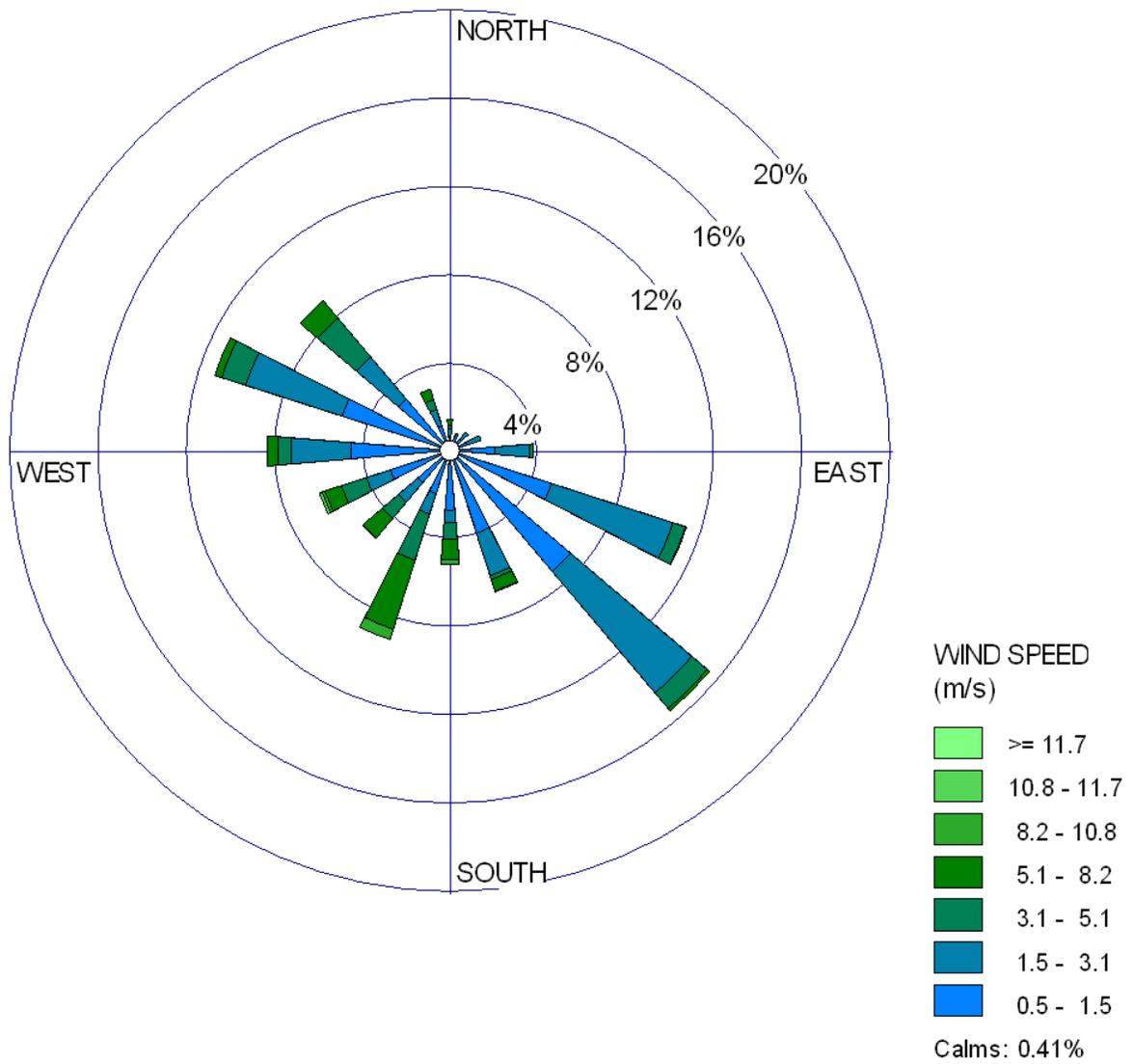
4.0 METEOROLOGICAL DATA ANALYSIS

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

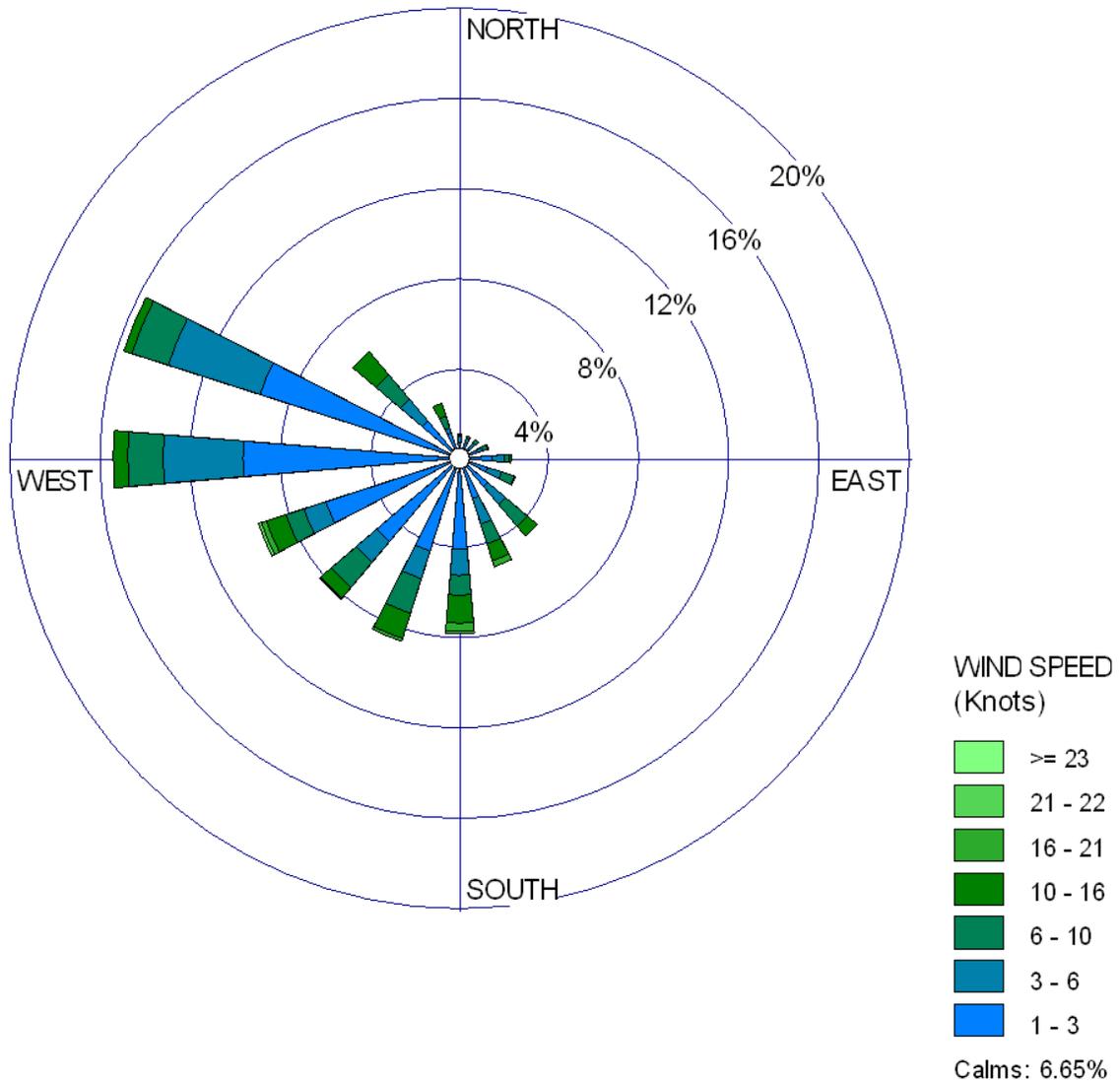
**Table 5
Monthly Average Meteorological Parameters**

Meteorological Parameter	October		November		December	
	Site #1	Site #2	Site #1	Site #2	Site #1	Site #2
Wind Speed (m/s)	3.03	2.84	2.03	1.77	1.99	1.69
Wind Direction (deg)	216.10	246.50	183.38	244.72	204.62	245.70
Sigma Theta Wind	26.21	29.21	29.29	30.87	29.45	27.59
Vertical Wind Speed EPS (cm/s)	2.08	6.32	1.05	3.49	1.30	3.15
Vertical Wind Speed EPS Std	20.26	37.53	13.56	26.21	11.62	18.34
Vertical Wind Speed CFT (cm/s)	8.45	14.61	5.14	8.61	4.32	7.23
Vertical Wind Speed CFT Std	21.89	41.53	14.49	28.93	13.04	20.93
2m Temperature (°C)	9.17	9.57	4.20	4.87	-5.70	-5.03
10m Temperature (°C)	9.73	N/A	5.19	N/A	-4.78	N/A
30m Temperature (°C)	N/A	10.20	N/A	6.14	N/A	-4.01
DeltaT (°C)	0.56	0.63	0.99	1.27	0.92	1.02
Relative Humidity (%)	41.44	40.04	55.61	52.91	69.52	66.59
RH Temperature (°F)	49.07	50.03	40.35	41.71	22.67	23.85
Barometric Pressure (in. Hg)	24.55	24.48	24.68	24.61	24.59	24.51
Solar Radiation (W/m ²)	168.40	165.88	134.16	128.68	100.95	96.67
Gust Speed (m/s)	6.32	6.30	4.32	4.24	4.21	3.87
Gust Direction (deg)	218.49	254.59	170.91	248.62	199.85	257.87
Total Precipitation (in.)	0.67	N/A	0.54	N/A	1.18	N/A
Total Evaporation (in.)	3.55	N/A	N/A	N/A	N/A	N/A
Average Daily Evaporation (in.)	0.11	N/A	N/A	N/A	N/A	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 west and northwest with a significant southwest component.



Site 1: 10m Wind Rose



Site 2: 30m Wind Rose

5.0 AIR QUALITY ANALYSIS

The EFR Monitoring Program collected data to examine both PM₁₀ 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 PM₁₀ Data Summary

The PM₁₀ 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 PM₁₀ data is required to be in LTP. The monthly and annual averages are presented in Table 6.

Table 6
PM₁₀ Concentrations

Sample Date	STP Concentration ($\mu\text{g}/\text{m}^3$)		LTP Concentration ($\mu\text{g}/\text{m}^3$)	
	Site #1	Site #2	Site #1	Site #2
October 4, 2009	47	45	39	37
October 10, 2009	NC	6	NC	5
October 16, 2009	NC	5	NC	4
October 22, 2009	5	4	4	3
October 28, 2009	2	2	2	2
November 3, 2009	5	5	4	4
November 9, 2009	NC	7	NC	6
November 15, 2009	5	6	5	5
November 21, 2009	7	7	6	6
November 27, 2009	6	7	6	6
December 3, 2009	3	3	3	3
December 9, 2009	5	5	5	5
December 15, 2009	3	3	3	2
December 21, 2009	5	5	5	4
December 27, 2009	3	3	3	3
October Average	18	12	15	10
November Average	6	6	5	5
December Average	4	4	4	3

NC – Not Collected

Elevated PM₁₀ concentrations on October 4 were likely due to high winds that day. The average wind speed on October 4 was 6.1 meters per second (m/s) compared to 2.4 m/s for the quarter and the average wind gust speed was 15.2 m/s compared to 5.0 m/s for the quarter.

5.2 Radionuclides

The fourth 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)	(pCi/liter)	(pCi/liter)	(pCi/liter)
Site 1	<7.4 x 10 ⁻⁹	3.6 x 10 ⁻⁶	4.4 x 10 ⁻⁹	-2.7 x 10 ⁻⁹
Site 2	<6.6 x 10 ⁻⁹	3.9 x 10 ⁻⁶	5.9 x 10 ⁻⁹	-6.4 x 10 ⁻⁹
Site 3	<6.5 x 10 ⁻⁹	3.9 x 10 ⁻⁶	4.4 x 10 ⁻⁹	3.5 x 10 ⁻⁸
Site 4	<6.7 x 10 ⁻⁹	4.7 x 10 ⁻⁶	5.7 x 10 ⁻⁹	1.3 x 10 ⁻⁹
Site 5	<6.5 x 10 ⁻⁹	3.1 x 10 ⁻⁶	2.3 x 10 ⁻⁹	-2.1 x 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 NRC Reg. Guide 4.14. Therefore, the negative concentrations presented in Table 7 are an 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 October 13 and 16, 2009 by EFR personnel. A copy of the EFR Calibration Report is included in Appendix E. Calibrations of meteorological instruments are performed semi-annually and were not performed in the fourth quarter 2009.

6.2 Independent Quarterly Audit Program

Independent auditing on the particulate matter equipment and meteorological instruments was performed by IML on November 18, 2009. A copy of the IML 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.

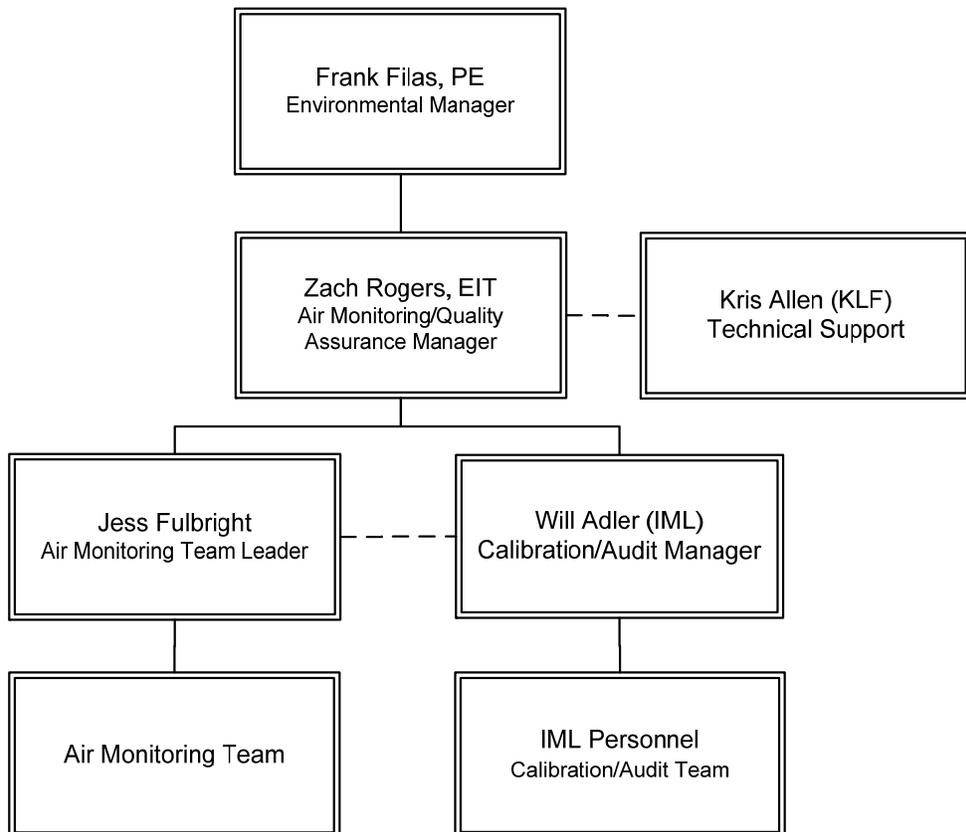
An intermittent equipment malfunction led to several missed PM₁₀ samples at Site 1 between September 22 and November 9, 2009 (see Section 3.2). The errors indicated that the flow rate fell below the required rate and the sampler terminated the sample run early as a result. Make-up samples were attempted, but were also unsuccessful in many instances. Field staff and manufacturer technicians performed thorough checks of the instrument and made fine adjustments. The instrument has performed without error since the November 15, 2009 sample run. The sampler will be monitored closely to determine if the issues arise again.

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

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