



ENERGY FUELS RESOURCES CORPORATION



August 23, 2011

Ms. Nancy Chick
Air Pollution Control Division
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

Re: Response to August 15, 2011 letter

Dear Ms. Chick,

Please see the attached responses to your August 15, 2011 comments on the First Quarter 2011 Data Report for Meteorological Monitoring for the Piñon Ridge Mill site. We have included your comments (in italics) with our responses below. Attached are replacement pages and a data CD containing the revised sections and full report in pdf format. The CD also includes all the qualified meteorological data from Site 1 and Site 2 for the Second Quarter 2008 through First Quarter 2011.

1. *There is a typographic error on page 1 of the report, which refers to meteorological data collection at five air monitoring stations. This should be "two stations".*

This correction has been made and a replacement page is provided with this letter.

2. *I was curious about some of the data records in the Site 2 files, which are highlighted in yellow. In the hourly file, hour 11 of March 22, 2011 is highlighted. In the 15-minute Site 2 file, periods 11:00 – 11:45 for March 22, 2011 are highlighted.*

I had highlighted rows of the draft meteorological data records referenced above for purposes of qualifying the data and inadvertently left them highlighted in the final version. The original audit report indicated that the tower was lowered at 10:48 MST. However, Energy Fuels' field notes indicated that the Site 2 meteorological tower was lowered at 11:48 MST. As a result, I highlighted these rows for possible data qualification pending resolution of this issue. The audit team double-checked their field notes and found that there was a transcription error in their report. They revised their QA Audit Report to indicate the time of lowering the tower to be 11:48 MST. As a result, the qualification of the rows in question was determined to be unnecessary. The highlighting of these rows has been removed and the meteorological data files included in the enclosed CD reflect this change.

3. *Now that three years of meteorological data (Second Quarter 2008 through First Quarter 2011) have been collected, I would like to get a summary data disk of all 15-minute and hourly data from Sites 1 and 2. This will serve as the final record of the meteorological data, and will bring it all into one file for future use.*

The enclosed CD includes the requested data.

| Description of Page(s) to be Changed | | |
|---------------------------------------|---|-----------------------|
| First Quarter 2011 Data Report | | |
| <input type="checkbox"/> Add | <input checked="" type="checkbox"/> Replace | Cover page (1 page) |
| <input type="checkbox"/> Add | <input checked="" type="checkbox"/> Replace | Page 1 of 12 (1 page) |

Please feel free to contact me at (303) 974-2151 if you need any additional information.

Sincerely,



Zach Rogers, P.E.
Environmental Engineer

Cc: **Edgar Ethington (CDPHE)**
Phil Egidi (CDPHE), letter only
Kris Allen (Kleinfelder)
Frank Filas (Energy Fuels)

**First Quarter 2011 Data Report
Replacement Pages**



**FIRST QUARTER 2011 DATA REPORT
FOR METEOROLOGICAL MONITORING
ENERGY FUELS RESOURCES CORPORATION
URANIUM MILL LICENSING SUPPORT
PIÑON RIDGE MILL
MONTROSE COUNTY, COLORADO**

**August 22, 2011
Revision: 1**

Prepared By:



**Energy Fuels Resources Corporation
44 Union Boulevard, Suite 600
Lakewood, Colorado 80228**

1.0 INTRODUCTION

This quarterly report provides meteorological data required for the assessment of air quality. The data collected during the First Quarter 2011 augments 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 (collected from the second quarter 2008 through the first quarter 2009) were summarized in the Meteorology, Air Quality and Climatology Report, revision 1, dated October 9, 2009 and prepared by Kleinfelder West, Inc. (Kleinfelder). Meteorological data were collected at two air monitoring stations (network) from the second quarter 2008 through the first quarter 2011, comprising 36 months of data which is three times the minimum required for permitting purposes. Meteorological monitoring was suspended at the end of the first quarter 2011 per the proposed changes to the monitoring program outlined in a letter to CDPHE dated March 12, 2010 and subsequently approved by CDPHE. Ambient air and meteorological monitoring will resume prior to the start of mill construction.

The project is under the regulation of the Colorado Department of Public Health and Environment (CDPHE) and will require a mill license (radioactive material license) by CDPHE's Radiation Management Program and construction permits by CDPHE's Air Pollution Control Division (APCD) to construct and operate. Radioactive Material License number 1170-01, Amendment Number 00 was issued by CDPHE on March 7, 2011. The APCD construction permits are currently pending.

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); 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.