



November 15, 2024

Daniel Czecholinski, Director
Division of Air Quality
Arizona Department of Environmental Quality
Technical Services Unit
1110 West Washington Street
Phoenix, AZ 85007

Re: Voluntary Reporting of COMPLY-R Dose Modeling for the Pinyon Plain Mine, January 1 to June 30, 2024

Dear Mr. Czecholinski:

Energy Fuels Resources (USA) Inc. ("EFRI") operates the Pinyon Plain Mine (the "Mine") located in Coconino County, Arizona. The purpose of this letter is to provide certain results of EFRI's voluntary reporting of COMPLY-R dose modeling for the Mine for the period January 1 to June 30, 2024.

Background

On July 2, 2015, EFRI submitted an Application for Approval of Construction or Modification of a New Source under 40 CFR 61.07 (the "Application"), which was approved by the U.S. Environmental Protection Agency ("EPA") on September 21, 2015. Under 40 CFR 61.22, emissions of radon-222 to the ambient air from an underground uranium mine shall not exceed those amounts that would cause any member of the public to receive in any year an effective dose equivalent ("dose") of 10 millirem per year ("mrem/yr") above background. In addition, 40 CFR 61.23(a) provides that compliance with this emission standard shall be determined, and the effective dose equivalent calculated by the EPA computer code COMPLY-R. Further, 40 CFR 61.24(a) provides that a mine owner or operator shall annually calculate and report the results of the compliance calculations in § 61.23, for each calendar year, to EPA by March 31 of the following year. EFRI's most recent report in accordance with § 61.23 was submitted to the EPA and Arizona Department of Environmental Quality ("ADEQ") on March 28, 2024.

Voluntary Reporting of COMPLY-R Dose Modeling

In September 2024, at the request of ADEQ, EFRI voluntarily committed to performing COMPLY-R dose modeling for the first six months of each calendar year (i.e., January 1 to June 30) to provide additional information to EFRI for use in complying with the annual emission standard in § 61.22 for the entire calendar year, and to reporting such results for the most impacted receptor or potential receptor to ADEQ within 30 days of completion of such modeling. For the first six months of 2024, EFRI agreed that such modeling would be performed, and the results to the most impacted receptor or potential receptor would be reported to ADEQ, by November 15, 2024. For each subsequent calendar year, such modeling would be completed and such results reported to ADEQ by September 30 of each year.

For the period January 1 to June 30, 2024, the results of COMPLY-R dose modeling show that the dose to the most impacted potential receptor is 0.0019 mrem, which is well below the 10 mrem/yr

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standard. Further, this “potential” receptor is not an actual receptor, but an uninhabited building located on lands managed by the U.S. Forest Service, which EFRI uses during dose modeling to provide a level of conservatism in performing dose estimates.

Should you have any questions regarding this report, please contact me at (303) 389-4134.

Yours very truly,



ENERGY FUELS RESOURCES (USA) INC.
Kathy Weinel
Director, Regulatory Compliance

cc: Matthew Lakin
Mark Chalmers
Dave Frydenlund
Scott Bakken
Travis Chiotti
Matt Germansen
Race Fisher
Jordan App
Nick Martin
Doug Chambers (Arcadis)
Arnon Ho (Arcadis)