

Attachment I
Spill Prevention, Control and
Countermeasures Plan

**Spill Prevention, Control, and
Countermeasure Plan
Daneros Mine**



**Prepared by
Energy Fuels Resources (USA) Inc.
225 Union Boulevard, Suite 600
Lakewood, CO 80228**

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List of Acronyms and Abbreviations

AST	Above Ground Storage Tank
EFRI	Energy Fuels Resources (USA) Inc.
EPA	U.S. Environmental Protection Agency
IBC Totes	Intermediate Bulk Containers
NRC	National Response Center
PE	Professional Engineer
SPCC	Spill Prevention, Control, and Countermeasure
STI	Steel Tank Institute
UDEQ	Utah Department of Environmental Quality

Introduction

The purpose of this Spill Prevention, Control and Countermeasures Plan (“SPCC Plan”) is to describe measures implemented by Energy Fuels Resources (USA) Inc. (“EFRI”) to prevent oil discharges from occurring, and to prepare site personnel to respond in a safe, effective and timely manner to mitigate the impacts of a discharge. This plan addresses petroleum products stored and used on site including diesel fuel and various types of oils.

This SPCC plan for the Daneros Mine has been prepared and implemented as required by the U.S. Environmental Protection Agency’s (EPA’s) regulations contained in Title 40, Code of Federal Regulations, Part 112, (40 CFR 112) Oil Pollution Prevention.

This plan provides guidance on key actions that EFRI must perform to comply with the SPCC rule. The key actions are:

- Complete monthly and annual inspections as outlined in Section 3.7 of this plan. The inspection sheets can be found in Appendix C.
- Perform annual training for site personnel that are responsible for facility inspections and oil handling as outlined in Section 3.8 of this plan. An annual training form is included in Appendix E.
- Perform preventative maintenance and implement best management practices to minimize the potential for spills as described in Sections 3 and 4.
- Control and clean up any spills in a safe and timely manner as described in Section 5.
- Report major spills to the appropriate agencies. A major spill is defined as a spill of 25 gallons or more or any spill that reaches surface waters. Surface waters do not include the on-site sediment ponds but do include the dry drainages adjacent to the Daneros, Bullseye and South Portal Areas. In the event of a major spill, the Utah Department of Environmental Quality (“UDEQ”) is to be notified. In the event that a spill of any size reaches surface waters, both UDEQ and the National Response Center (“NRC”) are to be notified. A Discharge Notification Form is included in Appendix I. The Discharge Notification Form contains the appropriate contact information. All spills, both major and minor, are to be documented on the Discharge Notification Form.
- Review the plan annually to address personnel and contact information changes as necessary. In addition, this plan needs to be reviewed every 5 years or more frequently to address potential control measures changes that may reduce the risk of a discharge. Changes in the facility design, construction, operation or installed tanks must be reflected in this SPCC Plan as soon as practicable. Minor changes can be hand written in the document while larger changes will typically require a revision of this plan.

In the event that the mine is on standby status and the oil products have been removed from the site, the procedures in this plan will not be implemented. If tanks remain on site, they will be tagged out of service to prevent accidental filling.

1.0 Plan Administration

1.1 Management Approval and Designated Person (40 CFR 112.7)

EFRI is committed to preventing discharges of oil to the environment through regular review and implementation of this SPCC Plan. EFRI management has approved this SPCC Plan and has committed the necessary resources to implement the measures described in this SPCC Plan.

The SPCC Plan will be implemented as herein described.

Frank Filas (Printed Name)
Director, Environmental & Regulatory (Title)
Affairs (Signature)

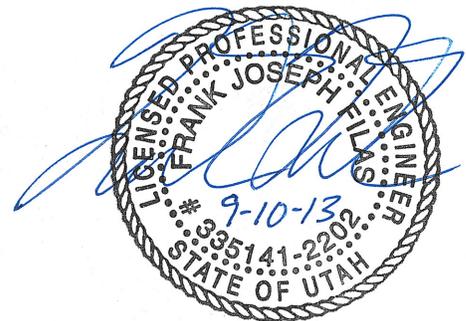
1.2 Professional Engineer Certification (40 CFR 112.3(d))

The undersigned Registered Professional Engineer ("PE") is familiar with the requirements of Part 112 of Title 40 of the Code of Federal Regulations (40 CFR 112) and has visited and examined the facility or has supervised the examination of the facility by a qualified person. The undersigned PE attests that this SPCC Plan has been prepared in accordance with good engineering practice including consideration of applicable industry standards and the requirements of 40 CFR 112. The procedures and required inspections and testing have been established and that this SPCC Plan is adequate for the facility.

This certification in no way relieves EFRI to prepare and fully implement this SPCC Plan. This SPCC Plan is valid only to the extent that EFRI maintains, tests, and inspects equipment and the containment as described in this SPCC Plan.

Professional Engineer: Frank Joseph Filas

Seal: Utah



1.3 Location of SPCC Plan (40 CFR 112.3(e))

A complete copy of this SPCC Plan will be maintained at the Daneros Mine office when oil products are being stored and used on site. A copy will also be maintained at the corporate office in Lakewood, Colorado.

1.4 Plan Review (40 CFR 112.3 and 112.5)

1.4.1 Changes in Facility Configuration

EFRI periodically reviews and evaluates this SPCC Plan for any changes to facility design, construction, operation, or maintenance that materially affects the facility's potential to discharge oil. These changes may include, but are not limited to:

- Commissioning of containers
- Installation or repair of piping
- Construction or modification of secondary containment

Amendments to the SPCC Plan that are made to address changes of this nature are referred to as technical amendments, and must be certified by a professional engineer or an otherwise qualified person. Technical amendments need to be incorporated into the SPCC within 6 months of the changes being implemented. Non-technical amendments can be made by site personnel and typically consist of changes in contact information.

1.4.2 Scheduled Plan Reviews

This SPCC Plan must be reviewed a minimum of every 5 years by a qualified person. Amendments made during the 5-year review must be implemented within 6 months of the review.

The next plan review is scheduled for January 2018.

1.4.3 Record of Plan Reviews

Scheduled reviews and SPCC Plan amendments are recorded in Table 1-1. This log is to be completed even if no amendment is made to the SPCC as a result of the review.

Table 1-1 SPCC Plan Review Log

By	Date	Activity	PE Certification Required?	Comments
Ryan Ellis	2/28/2013	Prepare SPCC Plan for expansion of facility	Yes	Initial SPCC Plan
Ryan Ellis	9/3/2013	Revision to South Portal Area	No	No Changes to Oil Handling facilities or procedures

1.5 Facilities, Procedures, Methods, or Equipment Not Yet Fully Operational (40 CFR 112.7)

Bulk storage containers are to be tested periodically after installation. Section 4.2.6 of this SPCC Plan describes the inspection program to be implemented, including the frequency of required testing for each of the bulk storage containers.

1.6 Cross Reference with SPCC Provisions (40 CFR 112.7)

This SPCC Plan does not follow the exact order presented in 40 CFR 112. Section headings, where appropriate, include the relevant sections of the SPCC Rule.

2.0 General Facility Information

Name: Daneros Mine

Operator: Energy Fuels Resources (USA) Inc.
225 Union Blvd, Suite 600
Lakewood, CO 80228
(303) 974-2140

Address: South ½ of Section 6, Township 37 South, Range 16 East and the Northeast ¼ of the Northeast ¼ of Section 18, Township 37S, Range 16 East

Driving Directions: The Daneros Mine is located approximately 4.8 miles southwest of Fry Canyon, Utah, in western San Juan County off Highway 95. The mine is accessed utilizing approximately 14 miles of Radium King Road, which is maintained by San Juan County.

Type: Underground Uranium Mine.

Primary Contact: Race Fisher, Facility Manager, 970-739-5742

2.1 Facility Description (40 CFR 112.7(a)(3))

2.1.1 Location and Activities

Location maps are included in Appendix A. Figure 1, General Location Map, shows the location of the Daneros Mine relative to Blanding, Utah, which is the nearest town. Figure 2, Site Plan, shows the three areas of the site consisting of the Daneros, Bullseye, and South portal areas. Figures 3, 4, and 5 show the layouts of each portal area, including details on fuel storage. Bullseye Canyon is an ephemeral drainage that traverses through both the Daneros and Bullseye portal areas. The oil storage facilities have been designed to minimize the potential for a release of diesel fuel or oil to the drainage.

EFRI uses oil products to generate electricity and compressed air and to operate mobile equipment. The Daneros, Bullseye and South Portal Areas make up the Daneros Mine. Each of these locations store oil products to support operations. Oil products are supplied from a fuel truck or through shipments in barrels. Hours of operation vary depending on desired production and the stage of mine/resource development. Gates and buildings are locked when the mine is not operating.

2.1.2 Oil Storage

Oil storage at the Daneros Mine occurs in 5 locations as shown below. Table 2-1 includes the tank ID, Capacity, Contents, Location and Description. Used oil and spilled oil material may be stored in 55 gallon drums or IBC totes.

Table 2-1 Oil Containers

Tank ID	Capacity	Content	Location	Description
Fixed Bulk Storage Tanks				
1	6,000 Gallon	Diesel	Daneros Portal Area - Fuel Area	Aboveground Steel Horizontal Tank Elevated on Built-in Saddles
2	6,000 Gallon	Diesel	Daneros Portal Area - Fuel Area	Aboveground Steel Horizontal Tank Elevated on Built-in Saddles
3	6,000 Gallon	Diesel	Bullseye Portal Area - Fuel Area	Aboveground Steel Horizontal Tank Elevated on Built-in Saddles
4	6,000 Gallon	Diesel	South Portal Area - Fuel Area	Aboveground Steel Horizontal Tank Elevated on Built-in Saddles
5	6,000 Gallon	Diesel	South Portal Area - Fuel Area	Aboveground Steel Horizontal Tank Elevated on Built-in Saddles
Portable Storage - Barrels				
	330 Gallon	Motor Oil	Daneros and South Portal Areas- Shop	55-gallon drums, (variable stock up to 6 at one time)
	330 Gallon	Hydraulic Oil	Daneros and South Portal Areas- Shop	55-gallon drums, (variable stock up to 6 at one time)
	330 Gallon	Used Oil	Daneros and South Portal Areas- Shop	55-gallon drums, (variable stock up to 6 at one time)
	330 Gallon	Rock Drill Oil	Daneros and South Portal Areas- Shop	55-gallon drums, (variable stock up to 6 at one time)
	330 Gallon	Collected Spilled	Daneros and South Portal Areas- Shop	55-gallon drums, (variable stock up to 6 at one time)

2.2 Evaluation of Discharge Potential

2.2.1 Distance to Navigable Waters and Flow Paths

The Daneros Portal Area consists of a relatively flat pad area in front of the mine's portals that is bermed to prevent a spill or release from impacting the adjacent drainage that flows into Bullseye Canyon. The Bullseye Portal Area slopes gently to Bullseye Canyon but will also have perimeter berms to control runoff. The South Portal Area will be constructed away from major drainages and will have a perimeter berm and sediment pond to control runoff. Bullseye Canyon is an ephemeral tributary to the Colorado River. It reaches the river at Lake Powell, approximately 10 miles west of the site.

2.2.2 Discharge History

There have been no major spills since EFRI began operating the Daneros Mine in 2011.

3.0 Discharge Prevention – General SPCC Provisions

The following measures are implemented to prevent oil discharges during the handling, use or transfer of oil products at the Daneros Mine. Employees receive periodic training in the proper implementation of these measures.

3.1 Compliance with applicable Requirements (40 CFR 112.7(a)(2))

Bulk oil containers of 55-gallon capacity or larger are required to have secondary containment. No evaluation of environmental equivalency is required.

3.2 Facility Layout Diagram (40 CFR 112.7(a)(3))

The General Location, Site Plan and Facility Diagrams are included in Appendix A. The Facility Diagrams (Figures 3 – 5) show the location and contents of the Above-Ground Storage Tanks (“ASTs”). The Facility Diagrams also show the stormwater flow directions for each area as well as the distance and general direction of the closest surface water feature.

3.3 Spill Reporting (40 CFR 112.7 (a)(4))

The Discharge Notification Form included in Appendix I will be completed upon detection of a discharge and prior to reporting a spill. See the Discharge Notification Form for the notification instructions and details. The spill location and quantity dictate the notification requirements. Major spills are to be reported to the appropriate agencies. A major spill is defined as a spill of 25 gallons or more or any spill that reaches surface waters. Surface waters do not include the on-site sediment ponds but do include the ephemeral drainages adjacent to the Daneros and Bullseye Portal Areas. In the event of a major spill, the Utah Department of Environmental Quality (“UDEQ”) is to be notified. In the event that a spill of any size reaches surface waters, both UDEQ and the National Response Center (“NRC”) are to be notified.

3.4 Potential Discharge Volumes and Directions of Flow (40 CFR 112.7 (b))

Table 3-1 presents the expected maximum volume, discharge rate, and flow direction of stored oil products in the event of equipment failure. The type of secondary containment for oil use, storage, and handling is also described for each location.

Table 3-1: Potential Discharge Volumes and Direction of Flow

Potential Event	Volume Released	Discharge Rate (gpm)	Direction of Flow	Secondary Containment
Bulk Storage Areas (Tank 1,2,3, 4 and 5)				
Failure of Tank	6,000	Gradual to Instantaneous	South	Concrete Fuel Containment
Tank Overfill	1 to 120	60	South	Concrete Fuel Containment
Pipe Failure	6,000	60	South	Concrete Fuel Containment
Leaking Pipe or Valve	600	1	South	Concrete Fuel Containment
Fuel Truck Leak	6000	Gradual to Instantaneous	South	Concrete Fuel Containment
Leak in Fuel Truck Delivery Line	300	60	South	Concrete Fuel Containment
Shop (IBC Totes and 55 Gallon Barrels)				
Leak or Drum Tip Over	55	Gradual to Instantaneous	Low Point in Shop	Shop Containment
IBC Puncture or Valve Failure	330	Gradual to Instantaneous	Low Point in Shop	Shop Containment

3.5 Containment and Diversionary Structures (40 CFR 112.7 (c))

Methods of secondary containment at the Daneros Mine include concrete fuel containment, shop building walls and spill kits to prevent discharge of oil to surface waters.

- Concrete Fuel Containment – The concrete fuel containment will house the bulk fuel tanks and will be constructed to hold greater than 110% of the capacity of the largest containers stored within the containment area. The concrete containment area will also be used to store materials that are awaiting shipment off site such as used oil and collected spilled materials. The concrete containment will be kept clean to aid in removing accumulated precipitation when necessary.
- Shop Buildings – The shops will have concrete floors and will be sloped to maintain spills within the building. An area within the shop will be designated for storage of 55-gallon drums and IBC Totes. Secondary containment dollies will be used for the 55-gallon drums that are moved throughout the shop during maintenance activities.
- Spill Kits – Spill kits will be stationed at the concrete fuel containment areas as well as in the shop buildings. These kits will include absorbent materials and containment bags and will be stored within a containment drum. These kits will also include a material inventory sheet to make sure that they remain stocked after use. Prior to

removal of precipitation in the concrete containment areas, the absorbent materials from the spill kits may be used to remove any visible oil sheen.

- Drip Pans - Drip pans will be used during maintenance activities and placed under parked equipment with leaks.

3.6 Practicability of Secondary Containment (40 CFR 112.7 (d))

EFRI has determined that secondary containment for bulk oil storage is practicable at the Daneros Mine and will be implemented at those storage areas.

3.7 Inspections, Tests, and Records (40 CFR 112.7 (e))

3.7.1 Daily Inspections

An EFRI employee performs a walk-through of the surface facility of the Daneros Mine each day that it is operating. The visual inspection walk-through includes inspection of:

- Tanks and piping for damage and/or leaks,
- Soils and building floors for oil staining,
- Concrete containment areas for adequate capacity (i.e., no accumulation of precipitation), and
- Oil container (55 gallons or greater) storage locations (i.e., containers are to be stored in designated areas with secondary containment).

3.7.2 Monthly Inspections

A monthly inspection checklist is included in Appendix C. The key elements covered in the monthly inspection are:

- Checking the bulk storage tanks and piping for signs of damage.
- Checking the concrete containment areas for signs of damage or instability.
- Inspecting each tank foundation for signs of instability.
- Inspecting tank foundations to assure that all sides of the tanks are visible and not leaking.
- Verifying the overfill protection system is working on the fuel tanks.
- Checking the inventory of the spill kits.

3.7.3 Annual Inspections

Annual inspections are a complement to the monthly inspections. The annual inspection is preferably conducted after a storm event to verify the adequacy of the secondary containment measures. The annual inspections are signed by the Facility Manager and are kept with this SPCC Plan for three years.

3.7.4 Periodic Integrity Testing

In addition to the monthly and annual inspections performed by site personnel, periodic integrity tests are required for the 6,000 gallon fuel tanks. The Steel Tank Institute recommends an integrity testing interval of once per 20 years for these tanks.

3.8 Personnel, Training, and Discharge Prevention Procedures (40 CFR 112.7 (f))

The Facility Manager is responsible for oil discharge prevention, control and response preparedness at the Daneros Mine. EFRI instructs its personnel with oil-handling responsibilities in the operation and maintenance of oil pollution prevention equipment, discharge procedures, applicable pollution control laws, general facility operations and the content of this SPCC Plan. Any new employee with oil-handling responsibilities will receive this same training prior to being involved in oil-handling operations.

Annual discharge prevention briefings are held by the Facility Manager for personnel with oil-handling responsibilities. The briefings are to ensure the continued understanding of, and adherence to, the discharge prevention procedures outlined in this SPCC Plan. The briefings also outline the best practices implemented at the site and review any spills that occurred in the previous year. A simulation of a spill is also conducted to ensure proper and prompt response and to address any changes to current procedures that are needed.

Briefings are recorded on the form included in Appendix E and are retained with this SPCC Plan for three years.

3.9 Security (40 CFR 112.7 (g))

The Daneros Mine does not have a fence around the facility due to the remote nature of the site. When unattended, access along Radium King Road will be prevented through a locked gate at the eastern portion of the site. There are no drains for the secondary containment. All fuel tanks will be locked to prevent unauthorized operation of the fuel dispensing system. The shops will be locked when unattended. There will be no security lighting. During periods of extended inactivity, fuel will be removed from the site to reduce the risk of spills caused by equipment failure or vandalism.

3.10 Tank Truck Loading/Unloading Rack Requirements (40 CFR 112.7 (h))

The potential for discharges during fuel delivery and dispensing is of particular concern at the Daneros Mine. The following measures are to be implemented to prevent spills during fuel transfer operations.

3.10.1 Secondary Containment (40 CFR 112.7 (h)(1))

The concrete secondary containment includes a concrete apron for the delivery truck to park over while transferring fuel. The concrete secondary containment has capacity for the largest container plus the precipitation from the 100-year, 24-hour storm event (2.8 inches). During fuel dispensing, the piece of equipment being fueled will park over the apron to collect any spills within the concrete containment. The concrete apron includes a 4" roll over berm to keep spills in and stormwater out. The concrete apron drains any oil or water away from the vehicle and into the concrete containment. A diagram of the concrete fuel containment is included in Appendix A. The accumulation of precipitation within the containment will be removed by an EFRI Employee after verifying that there is no oil sheen on the water and after filling out the containment pumping log included in Appendix D.

3.10.2 Loading/Unloading Procedures (40 CFR 112(h)(2) and (3))

All suppliers must meet the minimum requirements for tank truck loading and unloading established by the U.S. Department of Transportation. EFRI verify that fuel delivery drivers

understand the facility layout and have the necessary equipment to respond to a discharge from the delivery hose or vehicle.

The Facility Manager or designee supervises oil deliveries for all new suppliers, and periodically observes deliveries for existing suppliers. Employees trained in oil handling procedure will remain with the vehicle being fueled during the fuel transfer. Table 3-2 outlines the items that will be checked during fueling operations.

Table 3-2 Fuel Transfer Procedures

Stage	Task
Prior to fuel transfer	- Visually check transfer hose for signs of leaks
	- Verify sufficient volume (ullage) is available for the quantity planned to transferred
	- Secure the vehicle with wheel chocks and set parking brake
	- Verify valves are in the correct position for the fuel transfer
	- Turn off cell phone
During Fuel Transfer	- Stay with vehicle and monitor transfer
	- Turn the vehicle engine off unless it is required to transfer the fuel
	- Monitor fuel level to prevent overfill
	- Monitor flow meter to determine flow rate and gallons transferred
	- Reduce flow rate while topping off the tank
After Fuel Transfer	- Make sure the transfer operation is complete
	- Close valves before disconnecting the hose
	- Use a drip pan to collect any fuel remaining in the hose after closing the valve
	- Lock the dispensing hose to prevent unauthorized dispensing of fuel
	- Remove wheel chocks

3.11 Brittle Fracture Evaluation (40 CFR 112.7 (i))

There are no field constructed tanks and therefore brittle fracture evaluations are not necessary.

3.12 Conformance with State and Local Applicable Requirements (40 CFR 112.7 (j))

The bulk fuel tanks at the Daneros Mine are not regulated by the state of Utah or any local agency. The notification requirements for oil spills outlined in this SPCC plan are consistent with the Utah regulations.

4.0 Discharge Prevention – SPCC Provisions for Onshore Facilities

4.1 Facility Drainage (40 CFR 112.8 (b))

There are no drain valves for the secondary containment structures. The direction of surface drainage surrounding the concrete fuel containment areas and shops are shown on the facility diagrams. EFRI employees will verify that any precipitation collected in the secondary containment is oil free prior to removing the water. Removed precipitation can be sprayed on the pad area and allowed to evaporate. The facility stormwater drainage system is kept isolated from the containment area to prevent overtopping of the containment area with stormwater runoff.

4.2 Bulk Storage Containers (40 CFR 112.8(c))

Table 2-1 summarizes the construction, volume and content of the bulk storage containers at the Daneros Mine.

4.2.1 Construction(40 CFR 112.8(c)(1))

The bulk fuel tanks will be shop constructed steel tanks. The barrels and IBC totes will be steel or plastic and will be compatible with their contents.

4.2.2 Secondary Containment (40 CFR 112.8(c)(2))

Secondary containment structures at the three portal areas are shown on the facility diagrams. Their dimensions and containment volume are shown on the facility diagram as well as in Appendix F where the containment volume calculations are shown. The secondary containment structures are visually inspected monthly for cracks and settling to make sure the concrete structure would retain a spill of fuel or oil. Repairs will be made, as necessary, to maintain the integrity of the secondary containment area.

The drums and IBC totes stored within the shop are located in secondary containment basins. The shop floor is sloped away from doorways to low spots within the building. Barrel carts provide secondary containment when moving oil barrels within the shop.

4.2.3 Drainage of Diked Areas(40 CFR 112.8(c)(3))

Accumulated precipitation needs to be removed from secondary containment areas to prevent a reduction in available storage capacity. This precipitation needs to be oil free prior to removal from the secondary containment and prior to its application on the pad area for evaporation. If the content of the secondary containment is a mixture of oil and water, the absorbent socks included in the spill kit can be used remove the oil sheen. If the oil sheen can't be removed, the oil water mixture needs to be hauled off site for appropriate disposal by a disposal company. Records of containment drainage are maintained in Appendix D.

4.2.4 Corrosion Protection (40 CFR 112.8(c)(4))

There are no metal tanks or piping in contact with corrosive materials or soil. There are no locations where corrosion protection is necessary at the Daneros Mine.

4.2.5 Partially Buried or Bunkered Storage Tanks (40 CFR 112.8(c)(5))

There are no partially buried or bunkered tanks at the Daneros Mine.

4.2.6 Inspections and Tests (40 CFR(c)(6))

Visual inspections of the fuel tanks, barrels and IBC totes by facility personnel are completed according to the procedures described in this SPCC Plan. Leaks from tanks, gaskets, valves and hoses are promptly corrected. Records of inspections and tests are signed by the inspector and kept with this SPCC Plan at the Daneros Mine for at least three years.

Since the shop constructed steel fuel tanks have a capacity of greater than 5,000 gallons, they need to be tested for integrity at least once in 20 years. This testing interval is recommended by the Steel Tank institute. The fuel tanks will also be visually inspected on a monthly and annual basis. The drums and IBC totes are not re-used except for collection of used products. The tanks are inspected monthly and annually but are generally shipped off site for disposal within one year of arriving on site.

4.2.7 Heating Coils (40 CFR 112.8(c)(7))

Heating coils do not exist at the Daneros Mine.

4.2.8 Overfill Prevention System (40 CFR 112.8(c)(8))

All fuel tanks are equipped with a direct read level gauge that will be monitored during tank filling. Secondary containment is in place to collect spilled material in the event of a tank overflow.

Drums are not refilled with the exception of used product. Used product is transferred into the drum by hand reducing the risk of overflow.

4.2.9 Effluent Treatment Facilities (40 CFR 112.8(c)(9))

There are no effluent treatment systems in place at the Daneros Mine. Secondary containment and the design of the shop area where oil products are handled preclude oil products from mixing with stormwater runoff.

4.2.10 Visible Discharges (40 CFR 112.8(c)(10))

Visible leaks from tanks, barrels, hoses and valves are to be quickly fixed when identified. Spilled oil within the concrete secondary containment must also be removed in a timely manner and placed in drums. Keeping the secondary containment area clean helps prevent the mixing of oil with any accumulated precipitation.

4.2.11 Mobile and Portable Containers (40 CFR 112.8(c)(11))

Portable 55-gallon barrels and IBC totes are stored within the fuel secondary containment area or in the shops. There are designated secondary containment areas within each shop and barrel carts are available for when the drums need to be moved around the shop.

4.3 Transfer Operations (40 CFR 112.8(d))

Transfer operations at the Daneros Mine include:

- Fuel delivery to the fuel tanks.
- Vehicle fueling from the fuel tanks.
- Product delivery in 55-Gallon drums or IBC totes followed by moving the drums from the delivery truck into the shop.

- Pumping product from the drums into the equipment during maintenance operations.

All transfer operations utilize visible aboveground hoses which are inspected prior to using. Transfer equipment is locked when not in use either through locking the valve or shop doors to prevent unauthorized transfer. Signs are posted around the oil storage areas to warn equipment operators of the presence of stored fuels and oils and to prohibit smoking in close proximity to the oil storage areas.

5.0 Discharge Response

This section describes the response and cleanup procedures in the event of an oil spill or discharge. A spill or discharge is defined as a release of oil product to the environment (ground or water body). A release or leak within secondary containment is not considered a spill.

In general the following steps are taken:

- Eliminate potential spark sources.
- If possible and safe to do so, identify and shut down source of the leak.
- Contain the spill with berms or materials from the spill kits.
- Contact the Facility Manager.
- Fill out the discharge notification form, and as directed on the form, contact regulatory authorities and response organizations.
- Collect and dispose of the recovered products.

A List of emergency contacts is provided in Appendix H.

5.1 Response to a Minor Spill

A minor spill is defined as one that poses no significant harm or threat to human health and safety or to the environment. Minor spills are generally where:

- The quantity spilled outside of the secondary containment is less than 25 gallons.
- The spilled material is easily stopped and controlled at the time of the spill.
- Spilled material is not likely to reach surface waters.
- There is little risk to human health and safety.
- There is little risk of fire or explosion.

Minor spills can usually be cleaned up by EFRI employees. The following guidelines apply:

- Notify the Facility Manager.
- Under direction of the Facility Manager, contain the spilled materials and place the material in a properly labeled container.

Complete the Discharge Notification Form (Appendix I) and attach a copy to this SPCC Plan (this is typically done by or under the supervision of the Facility Manager).

5.2 Response to a Major Spill

A Major Spill is defined as a spill that exceeds 25 gallons or that reaches an adjacent drainage. The response to a major spill is the same as for a minor spill; however, it will also be necessary to notify one or more regulatory agencies of the spill and the corrective actions taken to control and clean up the spill. The Facility Manager will make these notifications after consulting with EFRI's Environmental Department.

5.3 Response to an Uncontrolled Spill

An Uncontrolled Spill is one that cannot be safely controlled or cleaned up by EFRI personnel, Such as when:

- The spill is large enough to spread beyond the immediate source location.
- The discharge material enters water.
- The spill requires special training or equipment to clean up.
- The spilled material poses a hazard to human health or safety.
- There is a danger of fire or explosion.

In the event of an Uncontrolled Spill, the following guidelines apply:

- All workers must immediately evacuate the discharge area.
- If the Facility Manager is not present, the senior on-site person notifies the Facility Manager of the spill and has authority to initiate the notification and response. The notification and response procedures are outlined on the Discharge Notification Form located in Appendix I.
- The Facility Manager or senior on-site person will call for medical assistance if workers are injured.
- The Facility Manager or senior on-site person will call the fire or police department if there is a risk of fire or explosion.
- The Facility Manager or senior on-site person will call the spill response contractor listed in the Emergency Contacts in Appendix H.
- The Facility Manager or senior on-site person will fill out the Discharge Notification Form and notify the required regulatory agencies as outlined on the Discharge Notification Form.

5.4 Spilled Material Disposal

Spilled material (oil product, contaminated soils, used cleanup materials) resulting from a controlled spill will be containerized by EFRI employees and removed from the site by a licensed disposal contractor. Spilled material resulting from an uncontrolled spill will be containerized and removed from the site by a cleanup contractor.

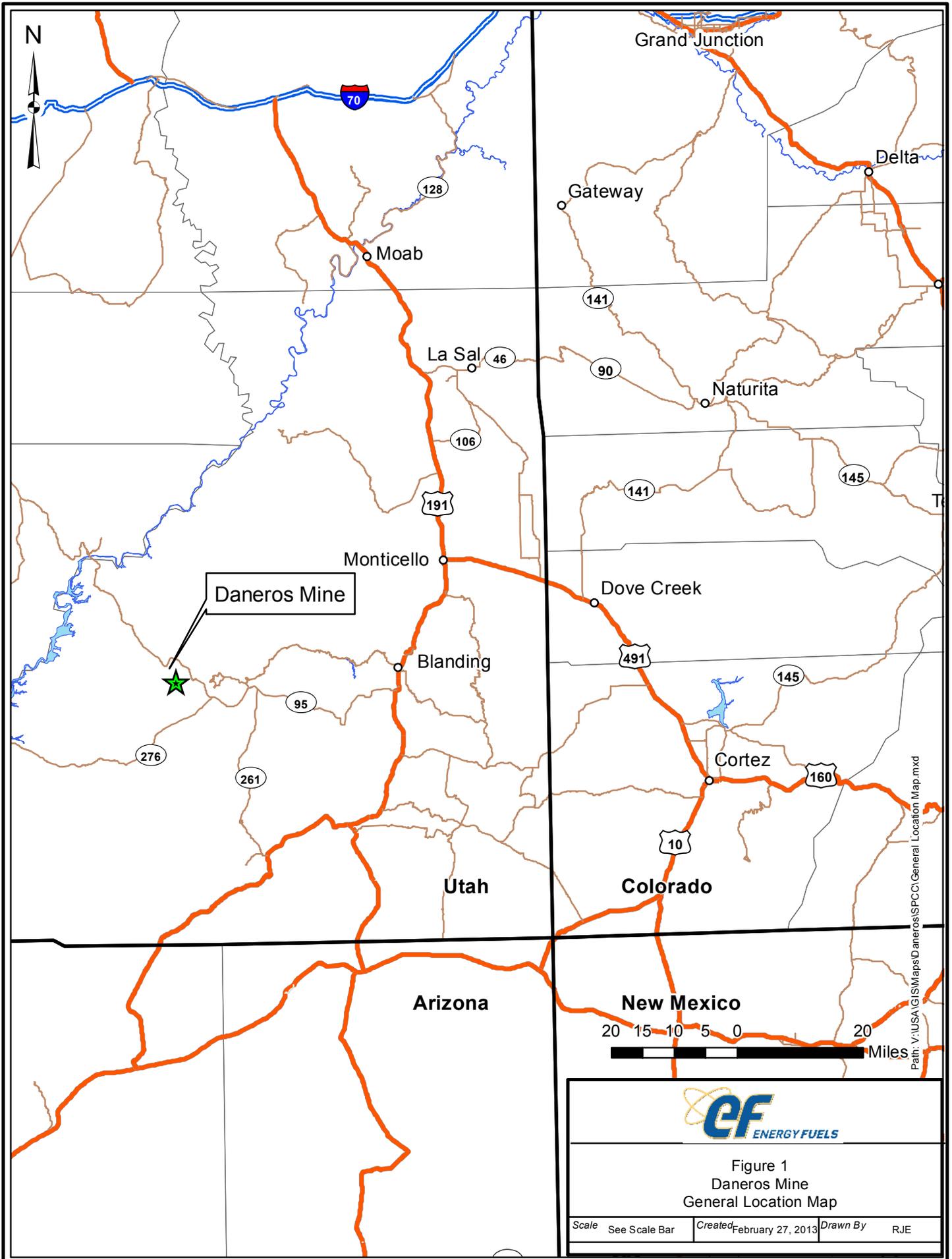
5.5 Discharge Notification

In the event of a discharge, the Facility Manager will fill out the Discharge Notification Form and notify the required agencies (after consultation with EFRI's Environmental Department) as outlined on the Discharge Notification Form.

5.6 Cleanup Contractors and Equipment Suppliers

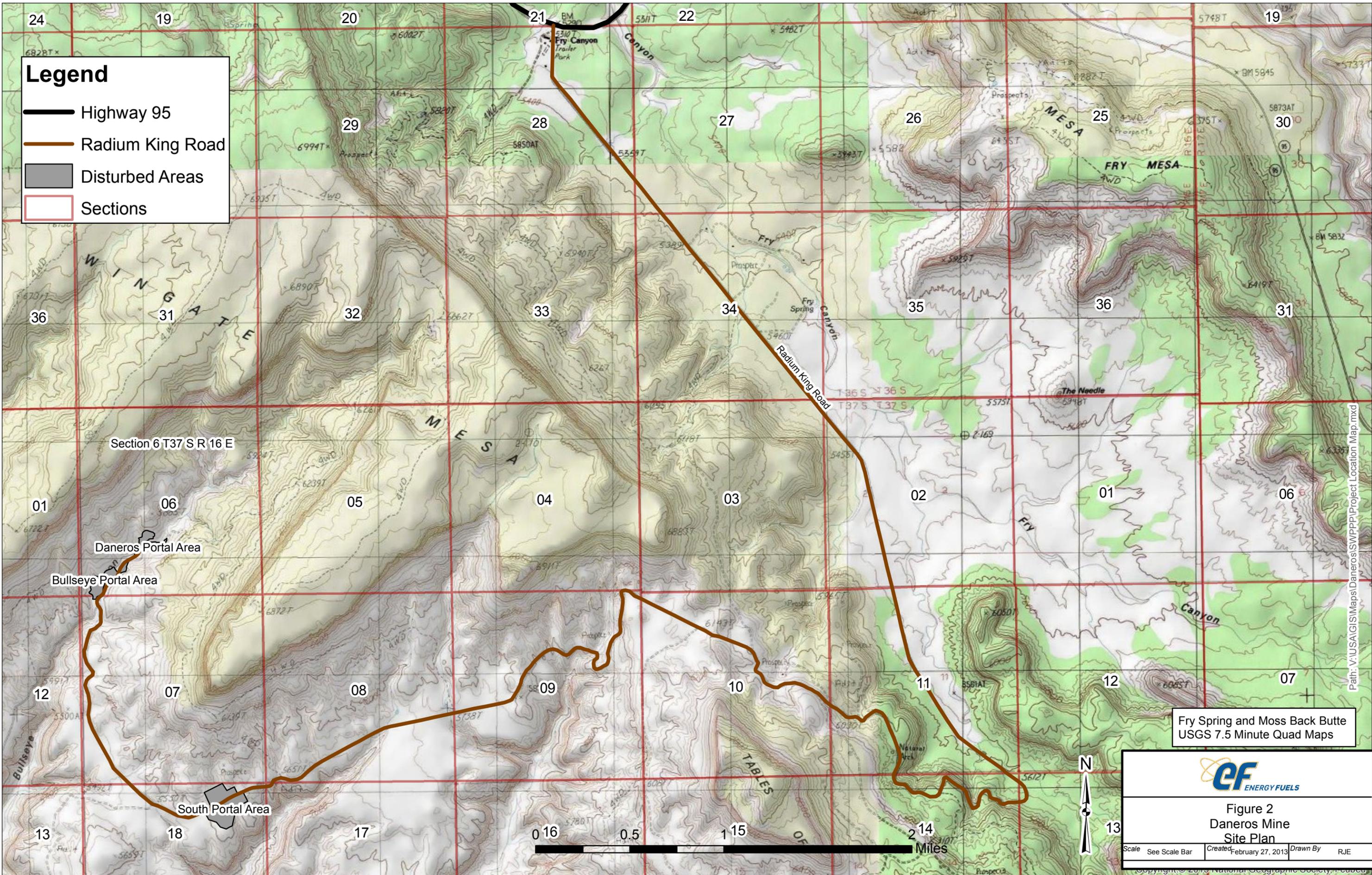
Contact information for cleanup contractors are included in Appendix H. Replacement spill kit supplies can be ordered from Grainger.com or 1-800 Grainger. An inventory of spill response equipment is listed in Appendix J.

Appendix A – General Location, Site Plan and Facility Diagrams



Legend

-  Highway 95
-  Radium King Road
-  Disturbed Areas
-  Sections



Fry Spring and Moss Back Butte
USGS 7.5 Minute Quad Maps



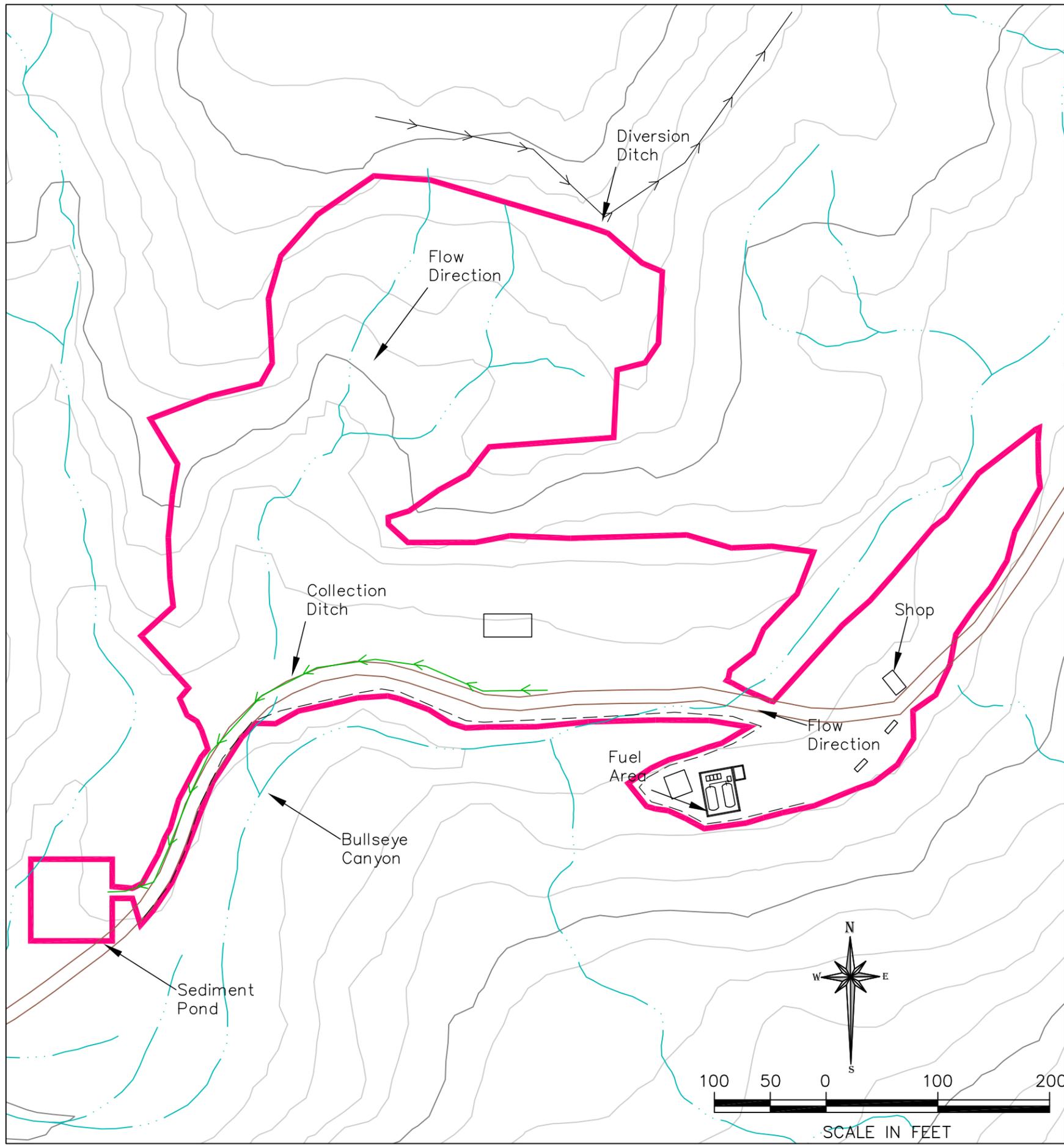
Figure 2
Daneros Mine
Site Plan

Scale	See Scale Bar	Created	February 27, 2013	Drawn By	RJE
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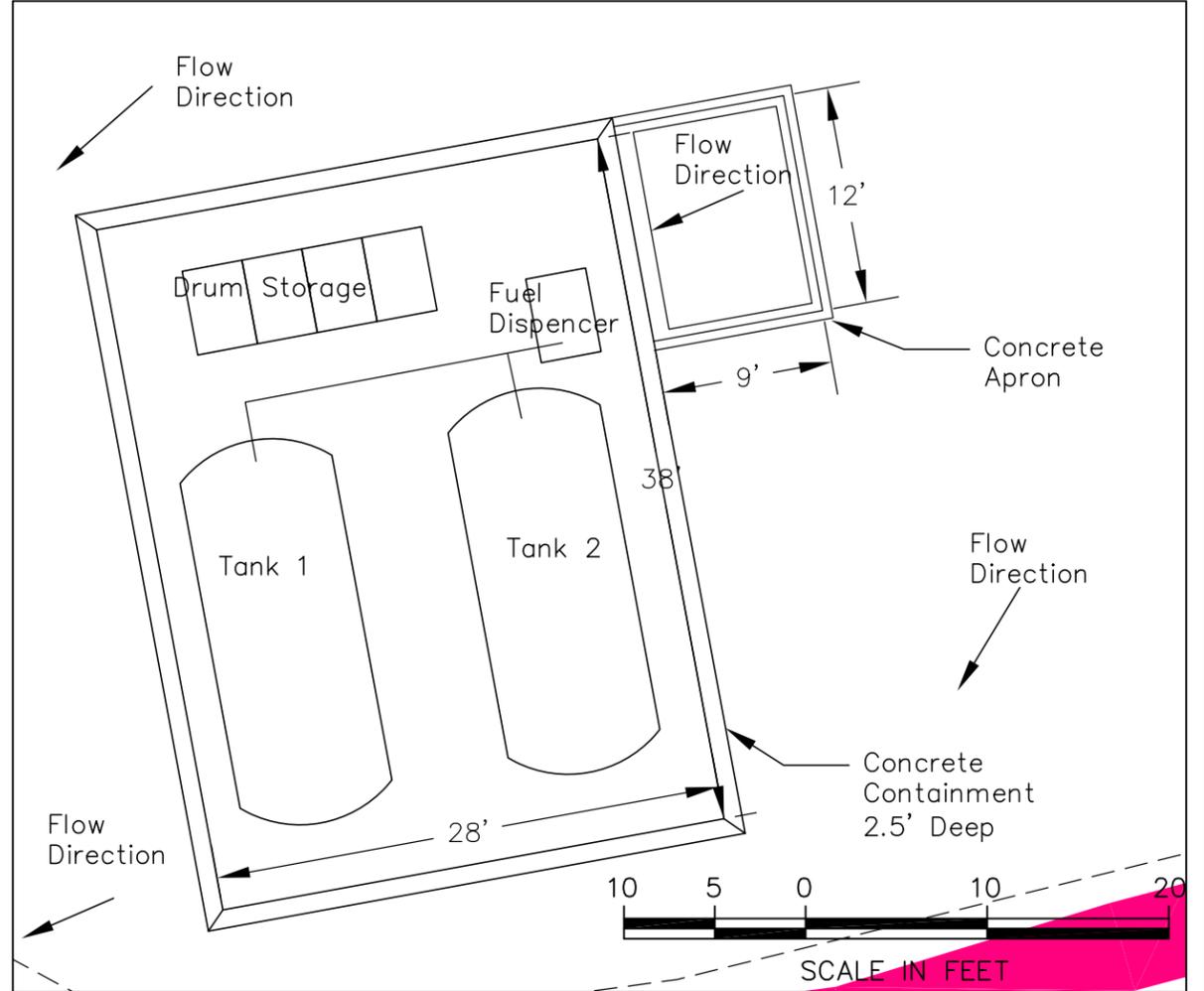
Path: V:\USA\GIS\Maps\Daneros\SWPPP\Project Location Map.mxd

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Fuel Area Detail



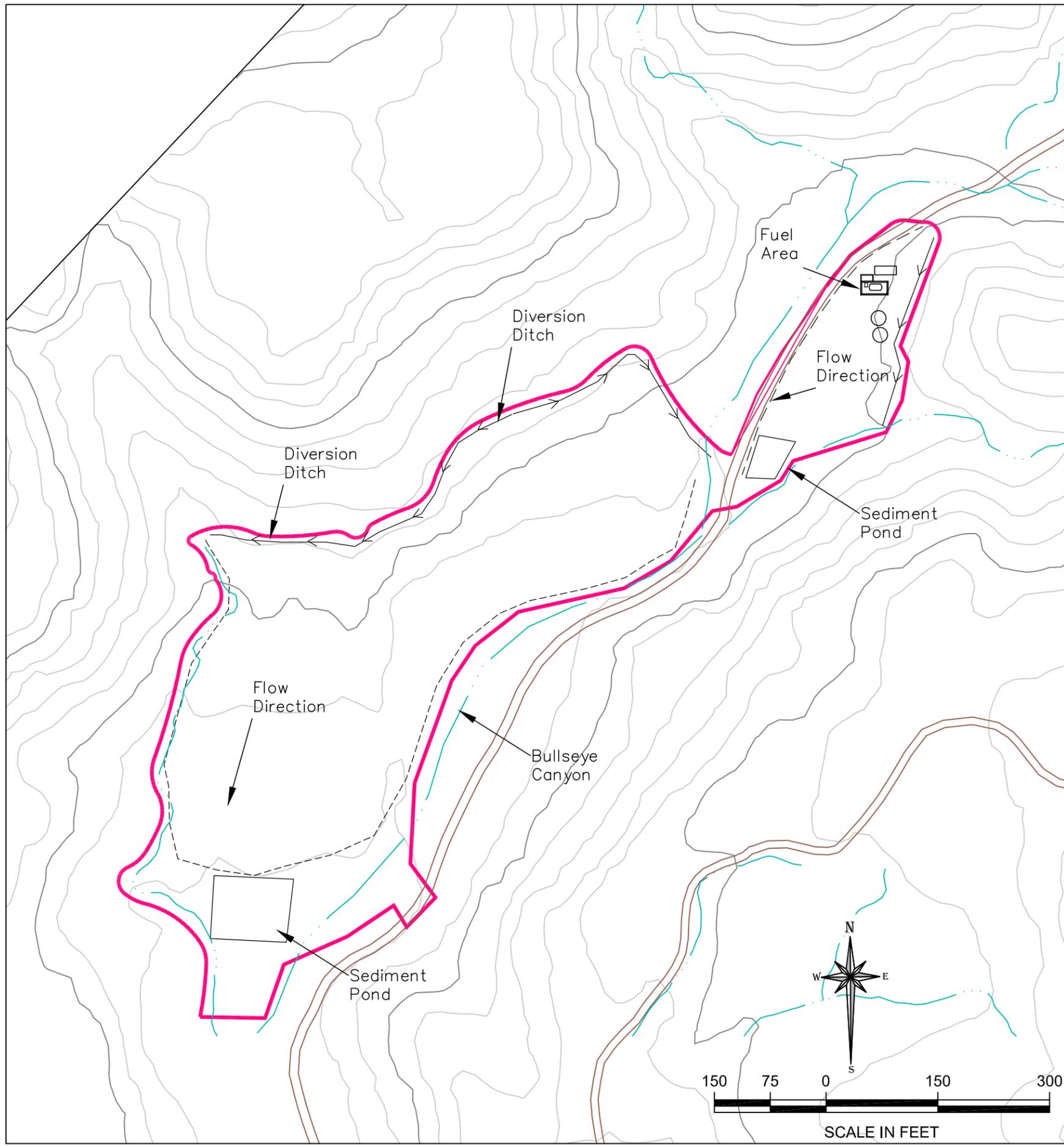
- Diversion Ditch
- Collection Ditch
- Containment Berm

Tank Contents		
Name	Content	Quantity
Tank 1	Diesel	6,000 gal
Tank 2	Diesel	6,000 gal
Barrels and IBC Totes	Used Oil, Contained Spilled Material	Up to 330 gal

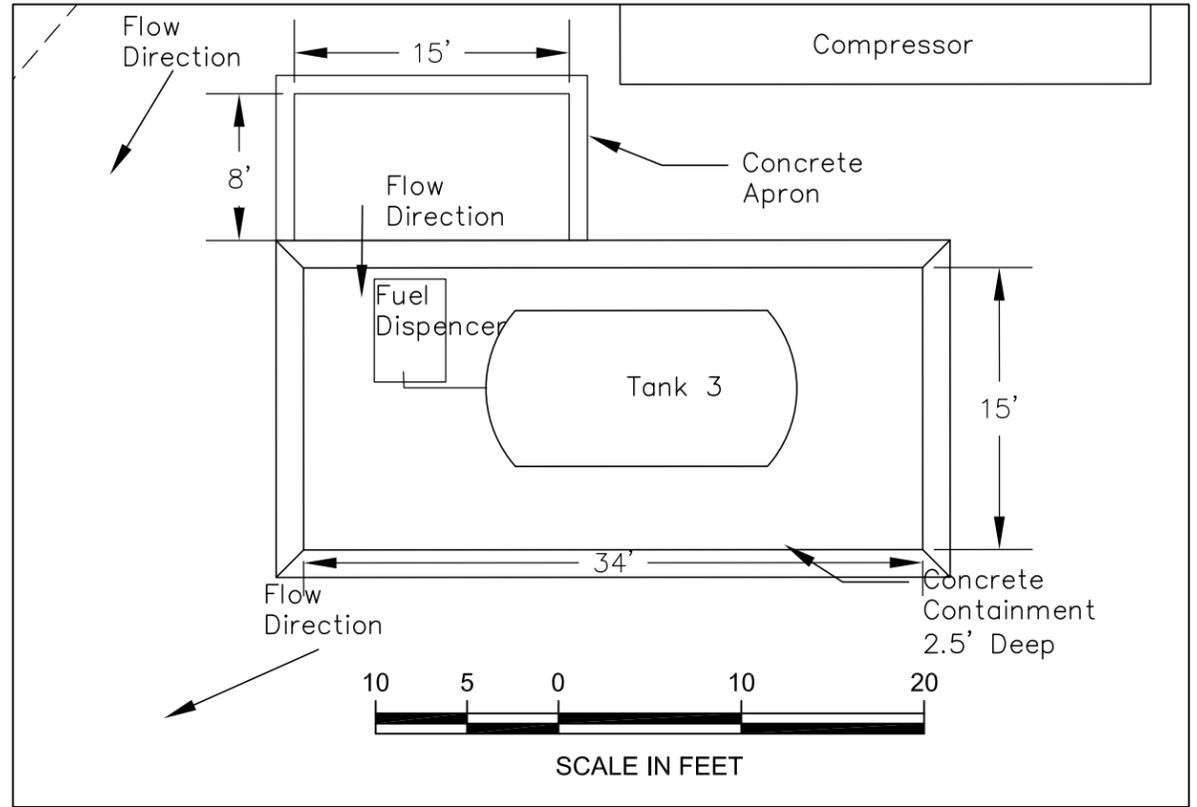
EF Energy Fuels Resources (USA) Inc.

REVISIONS	Project:	Daneros Mine	
Date	By	County: San Juan	State: Utah
		Location: Section 6 T37S R16E	
		Daneros Portal Area Facility Diagram	
	Author: RE	Date: 2/26/13	Drafted By: RE

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Fuel Area Detail



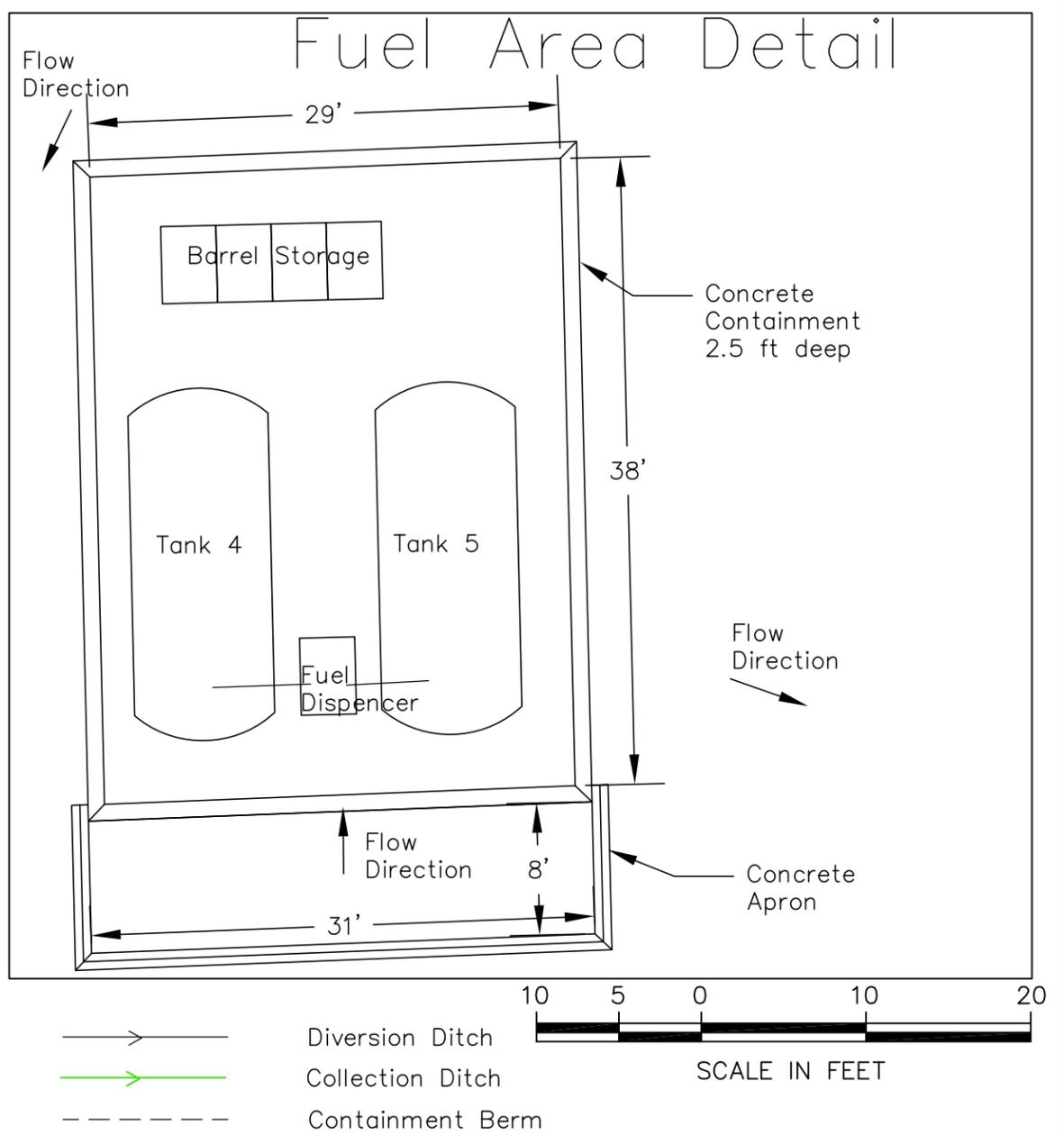
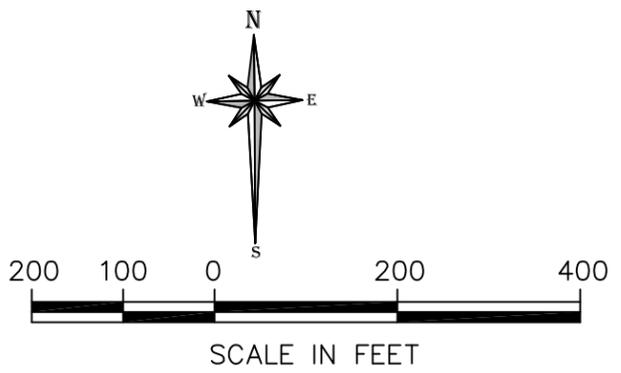
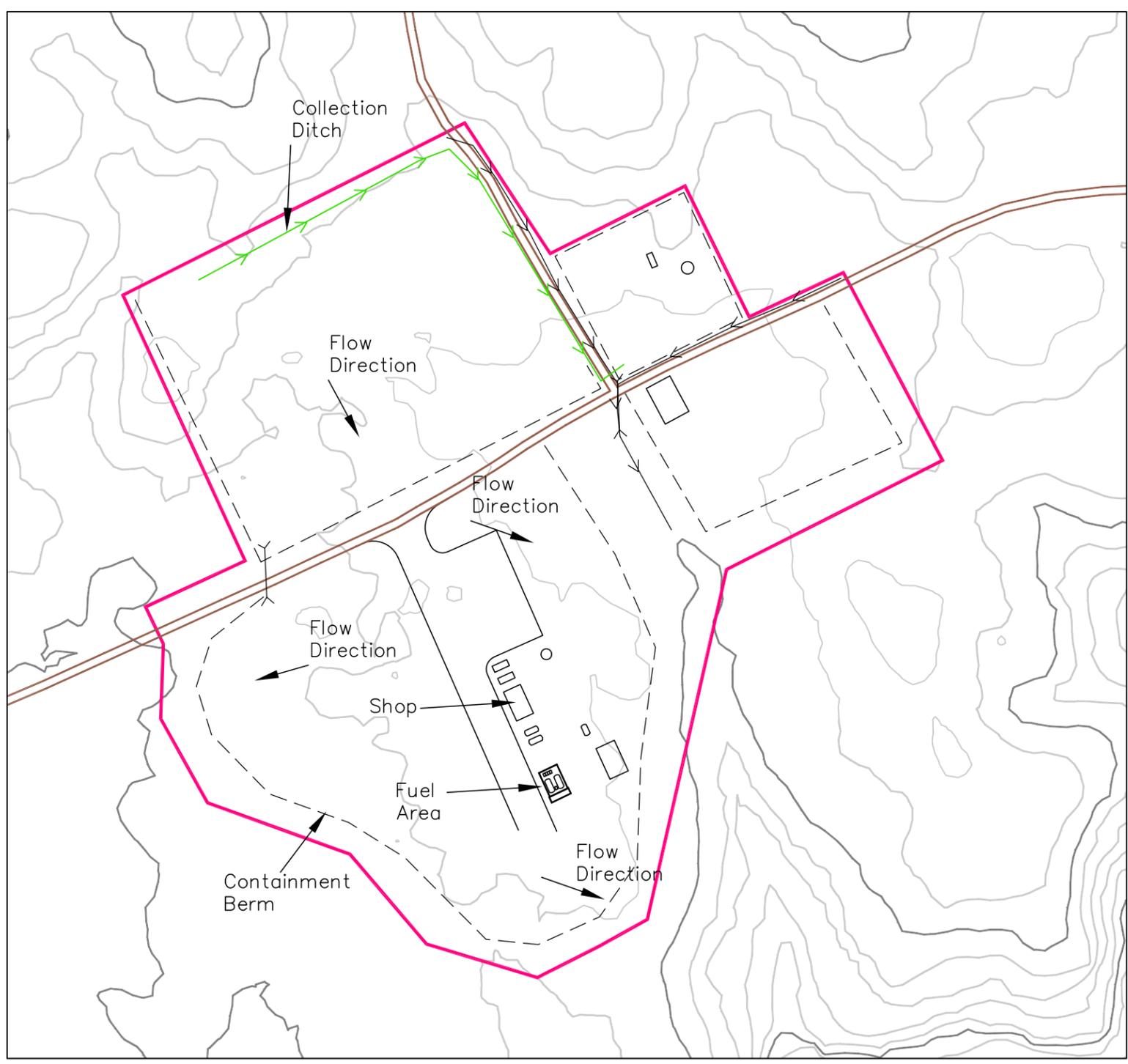
- Diversion Ditch
- - - Containment Berm

Tank Contents		
Name	Content	Quantity
Tank 3	Diesel	6,000 gal

EF Energy Fuels Resources (USA) Inc.

REVISIONS	Project: Daneros Mine	
Date	By	County: San Juan State: Utah
		Location: Section 6 T37S R16E
Figure 4 Bullseye Portal Area Facility Diagram		
	Author: RE	Date: 2/26/13
		Drafted By: RE

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Tank Contents		
Name	Content	Quantity
Tank 4	Diesel	6,000 gal
Tank 5	Diesel	6,000 gal
Barrels and IBC Totes	Used Oil, Contained Spilled Material	Up to 330 gal

EF Energy Fuels Resources (USA) Inc.

REVISIONS	Project: Daneros Mine		
Date	By	County: San Juan	State: Utah
		Location: Section 6 T37S R16E	
South Portal Area Facility Diagram			
	Author: RE	Date: 8/30/13	Drafted By: RE

Appendix B – Substantial Harm Determination

Facility Name: Daneros Mine

Facility Address: The Daneros Mine is located approximately 4.8 miles southwest of Fry Canyon, Utah in western San Juan County off Highway 95. The mine is accessed using approximately 14 miles of Radium King Road.

1	Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
2	Does the facility have a total oil storage capacity greater than or equal 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest above ground oil storage tank plus sufficient freeboard to allow for precipitation within the aboveground storage tanks area?
	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
3	Does the facility have a total oil storage capacity greater than or equal 1 million gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?
	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
4	Does the facility have a total oil storage capacity greater than or equal 1 million gallons and is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?
	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
5	Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?
	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature

Environmental Director

Title

Frank Filas

Name

Date

Appendix C – Facility Inspection Checklists

The following check lists are to be used for monthly and annual facility inspections. Completed checklists must be signed by the inspector and maintained at the facility with the SPCC Plan, for at least three years.



Monthly Inspection Checklist – Daneros Mine.

Date of Inspection: _____

Name of Inspector: _____

Signature: _____

Inspection Items		Yes	No
Fuel Tank Area			
-	Do the tanks contain oil Products?		
-	Are there any oil spills around the tanks?		
-	Are there any visible cracks or signs of rust or damage?		
-	Are all sides, including the bottom, visible for inspection?		
-	Do the tank foundations show signs of settling?		
-	Is the fuel level gauge working?		
-	Are the vents clear to allow proper operation?		
-	Is there precipitation in the concrete secondary containment?		
-	Are there drum awaiting removal from the site located within the concrete secondary containment?		
-	Does the secondary containment show signs of cracks or damage?		
Piping			
-	Does the dispensing hose show signs of leaks or damage?		
-	Is there a drip pan to collect small drips after fueling vehicles?		
-	Is the dispensing system locked when not in use?		
Shop Area			
	Are there oil containers located within the shop?		
	Are the oil containers located within the secondary containment area or on a barrel cart?		
	Are there any oils spills within the shop?		
General			
	Are oils containers properly labeled?		
	Are spill kits accessible and properly stocked?		
	Is the site kept orderly and free of debris?		
	Is the SPCC Plan available on site?		
	Were any recommended corrective actions fixed from the last inspection?		
	Is the site secured when not active?		
Comments and required corrective action			



Annual Inspection Checklist – Daneros Mine.

Date of Inspection: _____ Name of Inspector: _____

Facility Manage Signature: _____ Signature: _____

Inspection Items		Yes	No
Fuel Tank Area			
-	Do the tanks contain oil Products?		
-	Are there any oil spills around the tanks?		
-	Are there any visible cracks or signs of rust or damage?		
-	Are all sides, including the bottom, visible for inspection?		
-	Do the tank foundations show signs of settling?		
-	Is the fuel level gauge working?		
-	Are the vents clear to allow proper operation?		
-	Is there precipitation in the concrete secondary containment?		
-	Are there drum awaiting removal from the site located within the concrete secondary containment?		
-	Does the secondary containment show signs of cracks or damage?		
Piping			
-	Does the dispensing hose show signs of leaks or damage?		
-	Is there a drip pan to collect small drips after fueling vehicles?		
-	Is the dispensing system locked when not in use?		
Shop Area			
	Are there oil containers located within the shop?		
	Are the oil containers located within the secondary containment area or on a barrel cart?		
	Are there any oils spills within the shop?		
General			
	Are oils containers properly labeled?		
	Are spill kits accessible and properly stocked?		
	Is the site kept orderly and free of debris?		
	Is the SPCC Plan available on site?		
	Were any recommended corrective actions fixed from the last inspection?		
	Is the site secured when not active?		
Comments and required corrective action			



Annual Inspection Checklist Continued – Daneros Mine.

Date of Inspection: _____ Name of Inspector: _____

Facility Manager Signature: _____

Annual Reminders

Hold briefing for all the oil handling personnel.

Items covered in the annual briefing:

Personnel attending the briefing:

_____	_____
_____	_____
_____	_____
_____	_____

Additional Remarks:

Attach a photo log of corrective action items if applicable.

Appendix F – Calculation of Secondary Containment Capacity

The secondary containment volume calculations for the three concrete fuel areas are as follows:

The maximum contents within the containment + displacement volume of the tanks + 100 year 24 hr precipitation for the area = required containment volume with a 10% contingency.

1.0 Bullseye Portal Area

1.1 Capacity of Tanks within the Containment Area:

Tank 3 6,000 gallons

1.2 Tank Displacement at 2.5' Depth:

Tank 3 - 8' diameter, 16' length and 2.5' depth = 212.4 ft³ or **1,589 gal**

1.3 Precipitation:

Area of Concrete Containment – 34' x 15' = 510 ft²

Area of Concrete Apron – 8' x 15' = 120 ft²

Depth of 100yr 24 hr Storm: 2.8" or .23ft

Volume of Precipitation Capacity: 145 ft² or 1,083 gallons

1.4 Containment Volume

15' x 34' x 2.5' = 1,275ft³ or 9,562 gallons

Safety Factor 9,562/ (6,000+1,589+1,083) = **110%**

Appendix G – Records of Tank Integrity Testing

Attach copies of official records of tank integrity testing and pressure tests.

Appendix H - Emergency Contacts

Designated person responsible for spill prevention: Race Fisher, Facility Manager

Emergency Telephone Numbers:

Facility Manager

Race Fisher 970-739-5742

Local Emergency Response

Blanding Fire Department 435-678-2837

Spill Cleanup Contractor and Disposal Service

Enviro Care 801-229-1900

Notification

Utah Division of Environmental Quality 801-536-4300

National Response Center 800-424-8802

United States EPA, Region 8 303-312-6201

Other Emergency Contacts

BLM Monticello Field Office 435-587-1500

San Juan County Office of Emergency Management 435-587-3225

Appendix I – Discharge Notification Form

Discharge Information			
Company Name:	Energy Fuels Resources (USA) Inc.		
Company Address:	225 Union Blvd. Suite 600		
	Lakewood, CO 80228		
Company Telephone:	303-974-2140		
Site Name:	Daneros Mine		
Site Location:	Located approximately 4.8 miles southwest of Fry Canyon, Utah in western San Juan County off Highway 95. The mine is access using approximately 14 miles of Radium King Road.		
Primary Contact:	Race Fisher, Facility Manager, 970-739-5742		
Type of Oil:		Discharge Date and Time:	
Quantity Released:		Discovery Date and Time:	
Quantity Released to a water body (Including a dry drainage)		Discharge Duration:	
Location/Source:			
Actions taken to stop, remove and mitigate impacts of the spill:			
Affected media: Air, Water, Soil, Dry Channel,			
Nature of spill: environmental /health effects, damages			
Injuries or evacuation needed?			
Name and Phone Number of Person Completing Form:			
Notification Check List			
Contact Information	Date and Time of Notification	Name of Person Receiving Call	
Spill of any amount			
Race Fisher, Facility Manager, 970-739-5742			
Spill greater than 25 gallons outside of secondary containment not affecting a waterway			
Race Fisher, Facility Manager, 970-739-5742			
Utah DEQ, 801-536-4300			
Spill of any size affecting a waterway			
Race Fisher, Facility Manager, 970-739-5742			
Utah DEQ, 801-536-4300			
National Response Center, 800-424-8802			

Appendix J – Discharge Response Equipment Inventory

The Spill kit inventory is verified during monthly inspections and will be replenished as necessary.

Shop Spill Kits

Items	Quantity
Empty 55 gallon drum to place used clean up materials	2
Blank labels and marker to label containers after cleanup	10
Loose absorbent materials	100 lbs.
Absorbent pads	50
Absorbent socks	10
Rubber gloves	10
Dustpan and broom	1

Fuel Area Spill Kits

Items	Quantity
Empty 55 gallon drum to place used clean up materials	2
Blank labels and marker to label containers after cleanup	10
Loose absorbent materials	100 lbs.
Absorbent pads	10
Absorbent socks	10
Rubber gloves	10
Dustpan and broom	1

Appendix K – Agency Notification Standard Report

Information contained within this form must be submitted to EPA region 8 and Utah DEQ, within 60 days of a qualifying discharge event. This form should be completed by Energy Fuels staff in the Lakewood Office.

Facility:	Daneros Mine
Owner/ Operator:	225 Union Blvd. Suite 600
	Lakewood, CO 80228
	303-974-2140
Name of Person Filing this Report:	
Location:	Located approximately 4.8 miles southwest of Fry Canyon, Utah in western San Juan County off Highway 95. The mine is access using approximately 14 miles of Radium King Road.
Maximum Storage Capacity	31,650 gallons
Daily Throughput	1,000 Gallons
Nature of Qualifying incident:	
<input type="checkbox"/> Discharge to surface waters exceeding 1,000 gallons	
<input type="checkbox"/> Second discharge to surface waters exceeding 42 gallons within a 12 month period	
Description of Facility (Attach Facility Diagrams)	
<p>The Daneros Mine is an underground uranium mine with three portal areas, as shown on the attached Facility Diagrams. Energy Fuels uses diesel fuel and oil to support the mining operation. Fuel and oil is stored within secondary containment either within the shop buildings or the concrete fuel containment area. The Daneros Mine is located in a rural portion of San Juan County Utah.</p>	
Cause of discharge:	
Corrective actions implemented:	
Additional preventative measure implemented to minimize possibility of recurrence:	
Other Comments:	