

STORMWATER BEST MANGEMENT PRACTICES PLAN

for

White Mesa Uranium Mill
6425 South Highway 191
P.O. Box 809
Blanding, Utah

June 2008

Prepared by:
Denison Mines (USA) Corp.
1050 17th Street, Suite 950
Denver, CO 80265

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1.0 INTRODUCTION/PURPOSE

Denison Mines (USA) Corp. (“DUSA”) operates the White Mesa Uranium Mill (“the Mill”) in Blanding, Utah. The Mill is a net water consumer, and is a zero-discharge facility with respect to water effluents. That is, no water leaves the Mill site because the Mill has:

- no outfalls to public stormwater systems,
- no surface runoff to public stormwater systems,
- no discharges to publicly owned treatment works (“POTWs”), and
- no discharges to surface water bodies.

The State of Utah issued Groundwater Discharge Permit No. UGW370004 to DUSA on March 8, 2005. As a part of compliance with the Permit, DUSA is required to submit a Stormwater Best Management Practices Plan (“BMPP”) to the Executive Secretary of the Division of Radiation Control, Utah Department of Environmental Quality. This BMPP presents operational and management practices to minimize or prevent spills of chemicals or hazardous materials, which could result in contaminated surface water effluents potentially impacting surface waters or ground waters through runoff or discharge connections to stormwater or surface water drainage routes. Although the Mill, by design, cannot directly impact stormwater, surface water, or groundwater, the Mill implements these practices in a good faith effort to minimize all sources of pollution at the site.

2.0 SCOPE

This BMPP identifies practices to prevent spills of chemicals and hazardous materials used in process operations, laboratory operations, and maintenance activities, and minimize spread of particulates from stockpiles and tailings management areas at the Mill. Storage of ores and alternate feeds on the ore pad, and containment of tailings in the Mill tailings impoundment system are not considered "spills" for the purposes of this BMPP.

The Mill site was constructed with an overall grade and diversion ditch system designed to channel all surface runoff, including precipitation equivalent to a Probable Maximum Precipitation/Probable Maximum Flood ("PMP/PMF") storm event, to the tailings management system. In addition, Mill tailings, all other process effluents, all solid waste and debris (except used oil and recyclable materials), and spilled materials that cannot be recovered for reuse are transferred to one or more of the tailings cells in accordance with the Mill's NRC license conditions. All of the process and laboratory building sinks, sumps, and floor drains are tied to the transfer lines to the tailings impoundments. A site map of the Mill is provided in Figure 1. A sketch of the site drainage basins is provided in Figure 2.

As a result, unlike other industrial facilities, whose spill management programs focus on minimizing the introduction of chemical and solid waste and wastewater into the process sewers and storm drains, the Mill is permitted by NRC license to manage some spills via draining or washdown to the process sewers, and ultimately the tailings system. However, as good environmental management practice, the Mill attempts to minimize:

- 1) the number and size of material spills, and
- 2) the amount of unrecovered spilled material and washwater that enters the process sewers after a spill cleanup.

Section 4.0 itemizes the practices in place at the Mill to meet these objectives.

Requirements and methods for management, recordkeeping, and documentation of hazardous material spills are addressed in the DUSA White Mesa Mill Spill Prevention, Control and Countermeasures ("SPCC") Plan Revised February, 2007, the Emergency Response Plan ("ERP"), also revised in February, 2007, and the housekeeping procedures incorporated in the White Mesa Mill Standard Operating Procedures ("SOPs"). The SPCC plan and the ERP are provided in their entirety in Appendices 1 and 2, respectively.

3.0 RESPONSIBILITY

All Mill personnel are responsible for implementation of the practices in this BMPP. DUSA White Mesa Mill management is responsible for providing the facilities or equipment necessary to implement the practices in this BMPP.

The Mill Management Organization is presented in Figure 3. The DUSA Corporate Management Organization is presented in Figure 4.

An updated spill prevention and control notification list is provided in Table 1.

4.0 BEST MANAGEMENT PRACTICES

A summary list and inventory of all liquid and solid materials managed at the Mill is provided in Tables 2 through 5.

4.1 General Management Practices Applicable to All Areas

4.1.1 Keep Potential Pollutants from Contact with Soil, and Surface Water:

- Store hazardous materials and other potential pollutants in appropriate containers.
- Label the containers.
- Keep the containers covered when not in use.

4.1.2 Keep Potential Pollutants from Contact with Precipitation

- Store bulk materials in covered tanks or drums.
- Store jars, bottle, or similar small containers in buildings or under covered areas.
- Replace or repair broken dumpsters and bins.
- Keep dumpster lids and large container covers closed when not in use (to keep precipitation out).

4.1.3 Keep Paved Areas from Becoming Pollutant Sources

- Sweep paved areas regularly, and dispose of debris in the solid waste dumpsters or tailings area as appropriate.

4.1.4 Inspection and Maintenance of Diversion Ditches and Drainage Channels within the Process and Reagent Storage Area

- Diversion ditches, drainage channels and surface water control structures in and around the Mill area will be inspected at least weekly in accordance with the regularly scheduled inspections required by Groundwater Discharge Permit No. UGW370004, and Byproduct Materials License #UT1900479. Areas requiring maintenance or repair, such as excessive vegetative growth, channel erosion or pooling of surface water runoff, will be report to site management and maintenance departments for necessary action to repair damage or perform reconstruction in order for the control feature to perform as intended. Status of maintenance or repairs will be documented during follow up inspections and additional action taken if necessary.

4.1.5 Recycle Fluids Whenever Possible:

- When possible, select automotive fluids, solvents, and cleaners that can be recycled or reclaimed.
- When possible, select consumable materials from suppliers who will reclaim empty containers.
- Keep spent fluids in properly labeled, covered containers until they are picked up for recycle or transferred to the tailings area for disposal.

4.2 Management Practices for Process and Laboratory Areas

4.2.1 Clean Up Spills Properly

- Clean up spills with dry cleanup methods (absorbents, sweeping, collection drums) instead of water whenever possible.
- Clean spills of stored reagents or other chemicals immediately after discovery. (Groundwater Discharge Permit No. UGW370004, Section I.D.8.c.)
- Recover and re-use spilled material whenever possible.
- Keep supplies of rags, sorbent materials (such as cat litter), spill collection drums, and personnel protective equipment ("PPE") near the areas where they may be needed for spill response.
- If spills must be washed down, use the minimum amount of water needed for effective cleanup.

4.2.2 Protect Materials Stored Outdoors

- If drummed feeds or products must be stored outdoors, store them in covered or diked areas when possible.
- If drummed chemicals must be stored outdoors, store them in covered or diked areas when possible.
- Make sure drums and containers stored outdoors are in good condition and secured against wind or leakage. Place any damaged containers into an overpack drum or second container.

4.2.3 Water Management

- When possible, recycle and reuse water from flushing and pressure testing equipment.
- When possible, wipe down the outsides of containers instead of rinsing them off in the sink.
- When possible, wipe down counters and work surfaces instead of hosing or rinsing them off to sinks and drains.

4.2.4 Materials Management

- Purchase and inventory the smallest amount of laboratory reagent necessary.
- Do not stock more of a reagent than will be used up before its expiration date.
- All new construction of reagent storage facilities will include secondary containment which shall control and prevent any contact of spilled reagents, or otherwise released reagent or product, with the ground surface. (Groundwater Discharge Permit No. UGW370004, Section I.D.3.e.)

4.3 Management Practices for Maintenance Activities

4.3.1 Keep a Clean Dry Shop

- Sweep or vacuum shop floors regularly.
- Designate specific areas indoors for parts cleaning, and use cleaners and solvents only in those areas.
- Clean up spills promptly. Don't let minor spills spread.
- Keep supplies of rags, collection containers, and sorbent material near each work area where they are needed.
- Store bulk fluids, waste fluids, and batteries in an area with secondary containment (double drum, drip pan) to capture leakage and contain spills.

4.3.2 Manage Vehicle Fluids

- Drain fluids from leaking or wrecked/damaged vehicles and equipment as soon as possible. Use drip pans or plastic tarps to prevent spillage and spread of fluids.
- Promptly contain and transfer drained fluids to appropriate storage area for reuse, recycle, or disposal.
- Recycle automotive fluids, if possible, when their useful life is finished.

4.3.3 Use Controls During Paint Removal

- Use drop cloths and sheeting to prevent windborne contamination from paint chips and sandblasting dust.
- Collect, contain, and transfer, as soon as possible, accumulated dusts and paint chips to a disposal location in the tailings area authorized to accept waste materials from maintenance or construction activities.

4.3.4 Use Controls During Paint Application and Cleanup

- Mix and use the right amount of paint for the job. Use up one container before opening a second one.
- Recycle or reuse leftover paint whenever possible.
- Never clean brushes or rinse or drain paint containers on the ground (paved or unpaved). Clean brushes and containers only at sinks and stations that drain to the process sewer to the tailings system.
- Paint out brushes to the extent possible before water washing (water-based paint) or solvent rinsing (oil-based paint).
- Filter and reuse thinners and solvent whenever possible). Contain solids and unusable excess liquids for transfer to the tailings area.

4.4 Management Practices for Ore Pad, Tailings Area, and Heavy Equipment

Detailed instructions for ore unloading, dust suppression, and tailings management are provided in the Mill SOPs.

4.4.1 Wash Down Vehicles and Equipment in Proper Areas

- Wash down trucks, trailers, and other heavy equipment only in areas designated for this purpose (such as washdown pad areas and the truck wash station).
- At the truck wash station, make sure the water collection and recycling system is working before turning on water sprays.

4.4.2 Manage Stockpiles to Prevent Windborne Contamination

- Water spray the ore pad and unpaved areas at appropriate frequency in accordance with Mill SOPs.
- Water spray stockpiles as required by opacity standards or weather conditions.
- Don't over-water. Keep surfaces moist but minimize runoff water.

4.4.3 Keep Earthmoving Activities from Becoming Pollutant Sources

- Schedule excavation, grading, and other earthmoving activities when extreme dryness and high winds will not be a factor (to prevent the need for excessive dust suppression).
- Remove existing vegetation only when absolutely necessary.
- Seed or plant temporary vegetation for erosion control on slopes.

TABLES

Table 1
White Mesa Mill Management Personnel
Responsible for Implementing This BMPP

Mill Staff

<u>Personnel</u>	<u>Title</u>	<u>Work Phone</u>	<u>Home Phone/ Other Contact Number</u>
Rich E. Bartlett	Interim Mill Manager	435-678-2221 Ext. 105	435 678-2495
Wade Hancock	Maintenance Foreman	435-678-2221 Ext.166	435 678-2753
Scot Christensen	Mill Foreman	435-678-2221	435 678-2015
David E. Turk	Radiation Safety Officer	435-678-2221 Ext. 113	435 678-7802

Corporate Management Staff

<u>Personnel</u>	<u>Title</u>	<u>Work Phone</u>	<u>Home Phone/ Other Contact Number</u>
Ron F. Hochstein	President/ Chief Operating Officer	604 806-3589	Cell: 604 377-1167
David C. Frydenlund	Vice President and General Counsel	303 389-4130	303 221-0098 Cell: 303 808-6648

**TABLE 2
REAGENT YARD LIST**

REAGENT	QUANTITY (LBS)	NUMBER OF STORAGE TANKS	CAPACITY (GALLONS)
ADOGEN 2382	6,120	---	
ADVANTAGE 101M	2,475	---	
AMERSITE 2	0	---	
AMINE 2384	19,440	---	
AMMONIUM SULFATE (BULK)	54,000	---	
AMMONIUM SULFATE (BAGS)	4,300	---	
ANHYDROUS AMMONIA	107,920	2	31,409
CHEMFAC 100	12,800	---	
CLARIFLOC N-101P	3,000	---	
DECYLALCOHOL	45,430	---	
DIESEL FUEL		2	250
		1	6,000
FLOCCULENT M1011N	30,550	---	
FLOCCULENT M1302C	3,550	---	
GRINDING BALLS	48,290	---	
ISODECANOL	45,430	---	
KEROSENE	1,344	3	10,152
MACKANATE	3,150	---	
MILLSPERSE 802	1,410	---	
NALCO 2458	0	---	
NALCO 8815	0	---	
PERCOL 351	1,500	---	
PERCOL 406	13,950	---	
PERCOL 745	0	---	
POLOX	10,360	---	
POLYHALL YCF	0	---	
PROPANE		1	30,000
SALT (BAGS)	39,280	---	
SALT (BULK)	0	---	
SODA ASH (BAGS)	39,280	---	
SODA ASH (BULK)	84,100	1	16,921
		1	8,530
SODIUM CHLORATE	101,128	1	17,700
		1	10,500
SODIUM HYDROXIDE	0	1	19,904
SULFURIC ACID	4,801,440	1	1,600,000
		2	269,160
UNLEADED GASOLINE		1	3,000
USED OIL		1	5,000

**TABLE 3.0
LABORATORY CHEMICAL INVENTORY LIST¹**

<u>Chemical in Lab</u>	<u>RQ²</u>	<u>Quantity In Stock</u>
Aluminum nitrate	2,270 kg	1.8 kg
Ammonium bifluoride	45.4 kg	2.27 kg
Ammonium chloride	2,270 kg	2.27 kg
Ammonium oxalate	2,270 kg	6.8 kg
Ammonium thiocyanate	2,270 kg	7.8 kg
Antimony potassium tartrate	45.4 kg	0.454 kg
n-Butyl acetate	2,270 kg	4 L
Carbon tetrachloride	4.54 kg	1.0 L
Cyclohexane	454 kg	24 L
Ferric chloride	454 kg	6.810 kg
Ferrous ammonium sulfate	454 kg	0.57 kg
Potassium chromate	4.54 kg	0.114 kg
Sodium nitrite	45.4 kg	2.5 kg
Sodium phosphate tribasic	2,270 kg	1.4 kg
<u>Zinc acetate</u>	<u>454 kg</u>	<u>0.91 kg</u>

<u>Chemical in Volatiles and Flammables Lockers (A,B,C)</u>	<u>RQ²</u>	<u>Quantity In Stock</u>
Chloroform	4.54 kg	8 L
Formaldehyde	45.4 kg	<1L of 37% solution
Nitrobenzene	454 kg	12 L
Toluene	454 kg	12 L

<u>Chemical in Acid Shed</u>	<u>RQ²</u>	<u>Quantity In Stock</u>
Chloroform	4.54 kg	55 gal
Hydrochloric acid	2,270 kg	58 gal
Nitric acid	454 kg	5 L
Phosphoric acid	2,270 kg	10 L
Sulfuric acid	454 kg	25 L
Hydrofluoric Acid	45.4 kg	1 L
Ammonium hydroxide	454 kg	18 L

1. This list identifies chemicals which are regulated as hazardous substances under the Federal Water Pollution Control Act 40 CFR Part 117. The lab also stores small quantities of other materials that are not hazardous substances per the above regulation.
2. Reportable Quantities are those identified in 40 CFR Part 117 Table 117.3: "Reportable Quantities of Hazardous Substances Designated Pursuant to Section 311 of the Clean Water Act."

**TABLE 4.0
REAGENT YARD/SMALL QUANTITY CHEMICALS LIST ¹**

CHEMICAL	RQ²	QUANTITY IN STORAGE COMPOUND
Acetic Acid, Glacial	1,000 lbs	4 gal
Ammonium Hydroxide	1,000 lbs	5L
Carbon Disulfide	100 lbs	0 lbs
Calcium Hypochlorite	10 lbs	2 kg (4.4 lbs)
Chlorine	10 lbs	0 lbs
Ferrous Sulfate Heptahydrate	1,000 lbs	5 kg (11lbs)
Hydrochloric Acid	5,000 lbs	60 gal of 40% solution
Nitric Acid	1,000 lbs	10 L
Potassium Permanganate 0.1 N	32 gal	5 kg (11 lbs)
Sodium Hypochlorite 5.5%	100 lbs	2 kg (11 lbs) of 5.5% solution
Silver Nitrate	1 lb	0 lbs
Trichloroethylene	100 lb	2 L
Xylene (Mixed Isomers)	100 lbs	0 lbs

1. This list identifies chemicals which are regulated as hazardous substances under the Federal Water Pollution Control Act 40 CFR Part 117. Materials in this list are stored in a locked storage compound near the bulk storage tank area. The Mill also stores small quantities of other materials that are not hazardous substances per the above regulation.
2. Reportable Quantities are those identified in 40 CFR Part 117 Table 117.3: "Reportable Quantities of Hazardous Substances Designated Pursuant to Section 311 of the Clean Water Act."

**TABLE 5.0
REAGENT YARD/BULK CHEMICALS LIST¹**

<u>REAGENT</u>	<u>RQ²</u>	<u>QUANTITY IN REAGENT YARD</u>
Sulfuric Acid	1,000 lbs	9,000,000 lbs
Floc #301	None	1,200 lbs
Hyperfloc 102	None	1,500 lbs
Ammonia – East Tank	100 lbs	0 lbs
Ammonia – West Tank	100 lbs	105,000 lbs
Kerosene	100 gal	500 gal
Salt (Bags)	None	2,000 lbs
Ammonium Hydrogendifluoride	None	20,450 lbs
Soda Ash Dense (Bag)	None	0 lbs
Phosphoric Acid	5,000 lbs	6,300 lbs
Polyox	None	490 lbs
Millsperse	None	1,410 lbs
Nalco TX760	None	9 barrels
Nalco 7200	None	1,590 lbs
Tributyl phosphate	None	9,450 lbs
Distillates	None	100 gal
Diesel	100 gal	Approx. 3300 gal
Gasoline	100 gal	Approx. 6000 gal
Alamine 336 drums	None	0 lbs
Floc 109	None	0 lbs
Floc 208	None	0 lbs
Floc 904	None	0 lbs
Hyperfloc 624	None	0 lbs
Salt (Bulk solids)	None	0 lbs
Salt (Bulk solutions)	None	0 lbs
Caustic Soda	1,000 lbs	0 lbs
Ammonium Sulfate	None	0 lbs
Sodium Chlorate	None	20,000 lbs
Alamine 335 Bulk	None	0 lbs
Alamine 310 Bulk	None	0 lbs
Isodecanol	None	0 lbs
Vanadium Pentoxide ³	1000 lbs	30,000 lbs
Yellowcake ³	None	< 100,000 lbs
Ammonia Meta Vanadate	1000 lbs	0 lbs

1. This list identifies all chemicals in the reagent yard whether or not they are regulated as hazardous substances under the Federal Water Pollution Control Act 40 CFR Part 117.
2. Reportable Quantities are those identified in 40 CFR Part 117 Table 117.3: "Reportable Quantities of Hazardous Substances Designated Pursuant to Section 311 of the Clean Water Act."
3. Vanadium Pentoxide and Yellowcake, the Mill's products, are not stored in the Reagent Yard itself, but are present in closed containers in the Mill Building and/or Mill Yard.

**TABLE 6.0
PETROLEUM PRODUCTS AND SOLVENTS LIST¹**

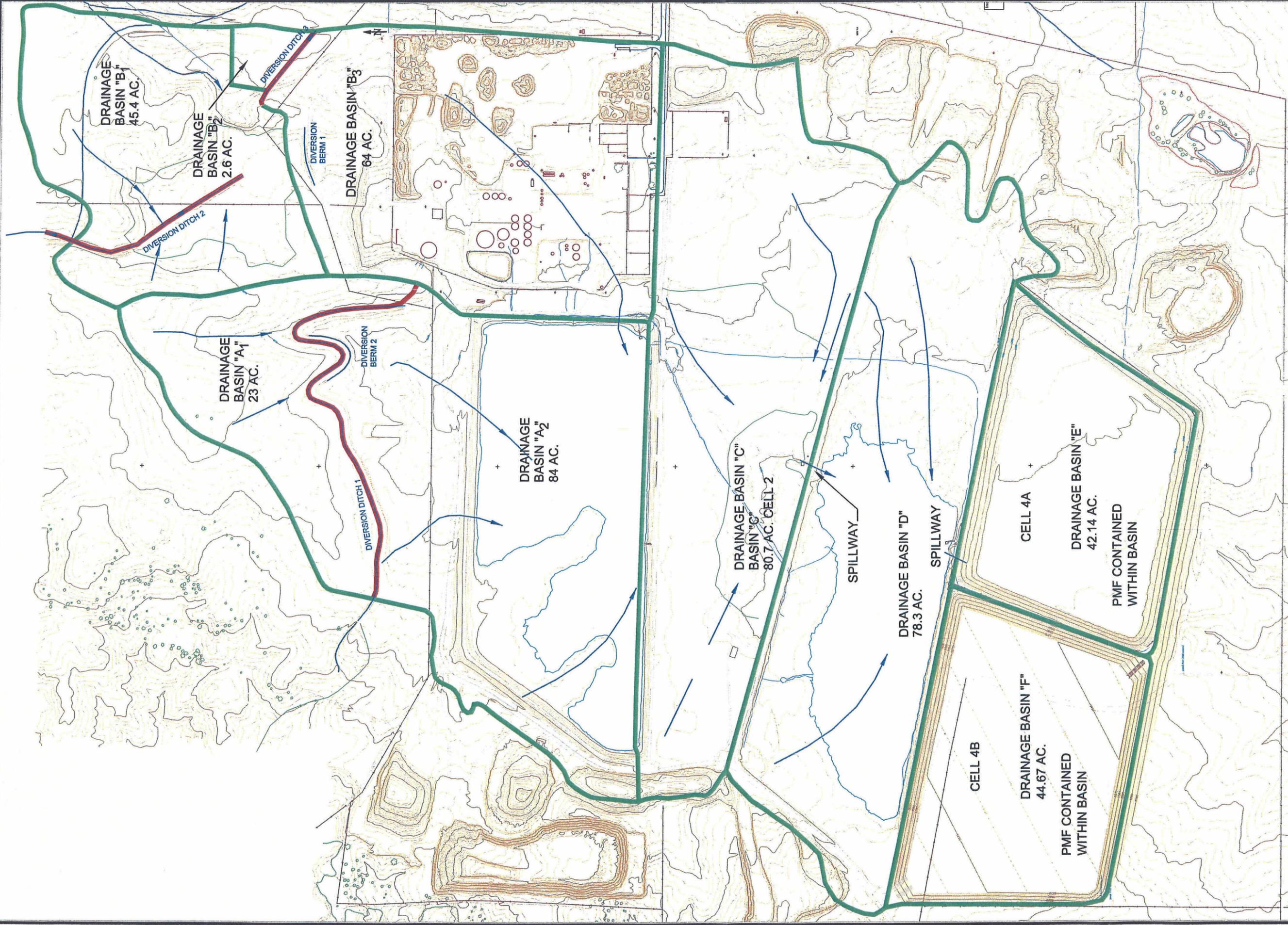
<u>PRODUCT</u>	<u>RQ</u>	<u>QUANTITY IN WAREHOUSE</u>
Lubricating Oils in 55 gallon drums	100 gal	1,540 gallons
Transmission Oils	100 gal	0 gallons
Water Soluble Oils	100 gal	30 gallons
Xylene (mixed isomers)	100 lbs	0 gallons
Toluene	1000 lbs	0 gallons
Varsol Solvent (2% trimethyl benzene in petroleum distillates)	100 gal	0 gallons

1. This list includes all solvents and petroleum-based products in the Mill warehouse petroleum and chemical storage aisles.
2. Reportable Quantities are those identified in 40 CFR Part 117 Table 117.3: "Reportable Quantities of Hazardous Substances Designated Pursuant to Section 311 of the Clean Water Act."

FIGURES

Figure 1
White Mesa Mill
Mill Site Layout

Figure 2
White Mesa Mill
Mill Site Drainage Basins



-  Surface Water Flow
-  Drainage Basins
-  Diversion Ditches
-  Diversion Berm

Denison Mines (USA) Corp. 

Project: WHITE MESA MILL

County: San Juan State: Utah
Location:

REVISIONS	Date	By
	2/15/07	BM
	10/24/07	BM
	05/16/08	BM
	06/11/08	BM
	12/9/08	DLS
	1/7/09	BM

Mill Site Drainage Basins

Figure 3
White Mesa Mill
Mill Management Organization Chart

International Uranium (USA) Corporation
 White Mesa Mill
 Organizational Structure

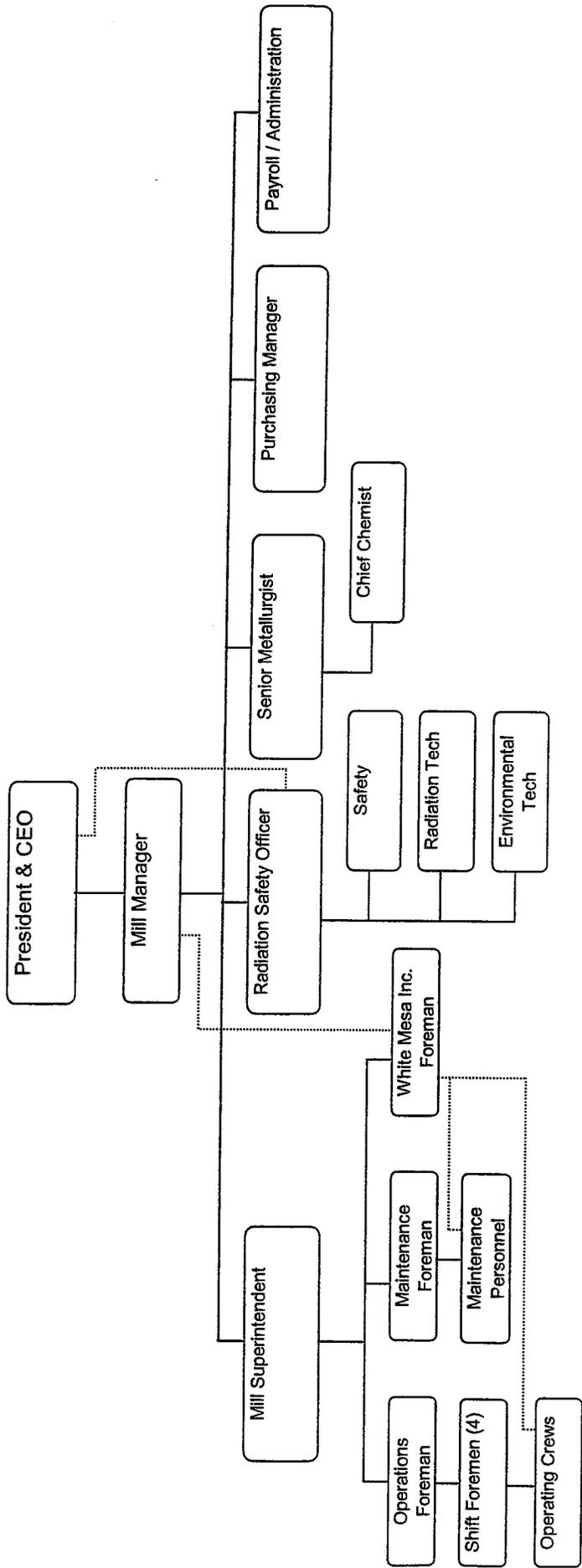


Figure 3

Figure 4

Corporate Management Organization Chart

International Uranium (USA) Corporation Organizational Structure

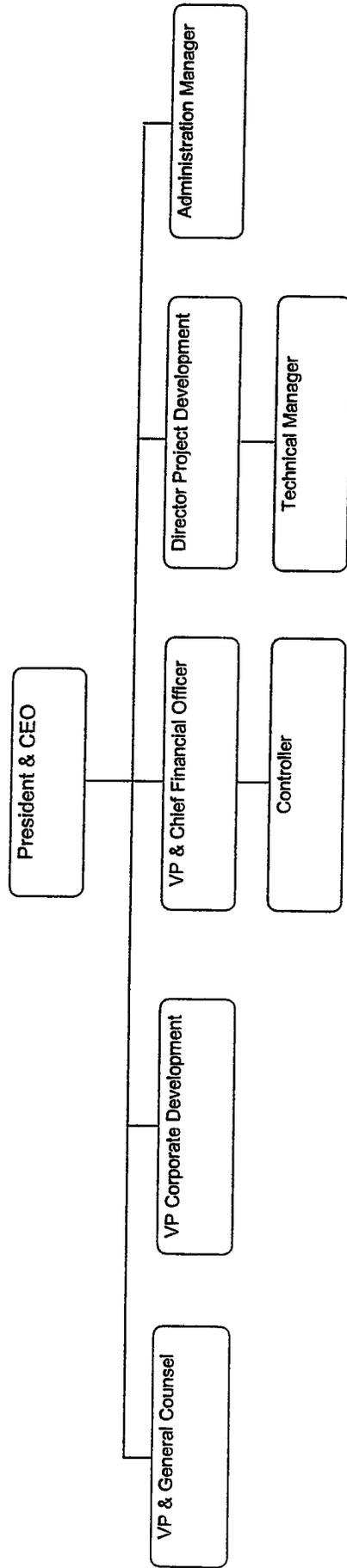


Figure 4

APPENDICES

APPENDIX 1

**WHITE MESA MILL
SPILL PREVENTION, CONTROL, AND COUNTERMEASURES
PLAN**

**SPILL PREVENTION, CONTROL, AND COUNTERMEASURES
PLAN**

FOR CHEMICALS AND PETROLEUM PRODUCTS

for

White Mesa Uranium Mill
6425 South Highway 191
P. O. Box 809
Blanding, Utah 84511

February 2007

Prepared by:
Denison Mines (USA) Corp.
1050 17th Street, Suite 950
Denver, Colorado 80265

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Figure 2	Mill Site Drainage Basins

WHITE MESA MILL

SPILL PREVENTION, CONTROL, AND COUNTERMEASURES PLAN FOR CHEMICALS AND PETROLEUM PRODUCTS

1.1 OBJECTIVE:

The objective of the Spill Prevention, Control, and Countermeasures (SPCC) Plan is to serve as a site-specific guideline for the prevention of and response to chemical and petroleum spills, and as a guidance document for compliance with Groundwater Discharge Permit No. UGW370004. The plan outlines spill potentials, containment areas, and drainage characteristics of the White Mesa Mill site. The plan addresses chemical spill prevention, spill potentials, spill discovery, and spill notification procedures. The Oil Pollution Prevention Sections of the Clean Water Act (40 CFR 112 to 117), also referred to as the Spill Prevention, Control, and Countermeasures ("SPCC") rules, establish requirements that apply to facilities which could reasonably be expected to discharge oil in quantities that may be harmful, as described in that Act, into or upon the navigable waters of the United States or that may affect natural resources of the United States. Section 112 states that the Act is not applicable to facilities that are not subject to the authority of the U. S. Environmental Protection Agency ("EPA") for one of the following reasons:

1. Due to its location, the facility could not reasonably be expected to discharge oil into navigable waters of, or impact natural resources of, the U.S. or
2. The facility is subject to authority of the Department of Transportation as defined in a Memorandum of Understanding ("MOU") between the Secretary of Transportation and the EPA Administrator, or
3. The facility does not exceed either the underground or the above ground storage capacity (42,000 gallons and 1,320 gallons, respectively) prescribed in the rules.

The Mill could not reasonably be expected, as described in the SPCC regulation, to discharge oil into the navigable waters, or impact natural resources, of the U.S. The Mill site was constructed with an overall grade and diversion ditch system designed to channel the non-recovered portion of any material spill to the tailings management system. Hence, it is not reasonable to expect that surface spills will ever reach navigable waters or natural resources of the U.S. or Utah.

Therefore, the SPCC reporting requirements in the Clean Water Act are not applicable to the Mill. However, as good environmental management practice, the Mill has implemented the spill management program, described in this

document, which is consistent with the intent of the Clean Water Act to the extent practicable. Although the Mill, by design, cannot directly impact navigable waters of the U.S., and as a result, spills that may occur but are retained within the site would not be "reportable", the Mill implements these practices in a good faith effort to minimize all potential sources of pollution at the site.

Storage of ores and alternate feeds on the ore pad, and containment of tailings in the Mill tailings impoundment system are not considered "spills" for the purposes of this SPCC.

Ammonia is the only chemical that has the potential to leave the site, and would do so as a vapor.

Figure 1, Site Layout Map shows a map of the mill site including the locations of the chemical tanks on-site. Figure 2 shows the basins and drainage ditch areas for the mill site. Table 1.0 is an organization chart for Mill operations. Table 2.0 lists the reagent tanks and their respective capacities. Table 3.0 lists the laboratory chemicals, their amounts, and their reportable quantities. Table 4.0 lists the operations chemicals. Table 5.0 lists the chemicals in the reagent yard, their amounts, and their reportable quantities. Table 6.0 lists the petroleum products and solvents on site.

1.2 RESPONSIBILITIES:

Person in charge of facility responsible for spill prevention:

Mr. Richard E. Bartlett, Interim Mill Manager

6425 South Highway 191

Blanding, UT 84511

(435) 678-2221 (work)

(435) 459-2495 (home)

Person in charge of follow-up spill record keeping and/or reporting:

Mr. David E. Turk, Department Head, Health , Safety, and Environmental

6425 South Highway 191

Blanding, UT 84511

(435) 678-2221 (work)

(435) 678-7802 (home)

Refer to *Section 1.9 Spill Incident Notification* for a list of company personnel to be notified in case of a spill. In addition, an organizational chart is provided in Table 1.0.

1.3 DRAINAGE BASINS, PATHWAYS, AND DIVERSIONS:

The main drainage pathways are illustrated in Figure 2. The map shows drainage basin boundaries, flow paths, constructed diversion ditches, tailings cells, the spillway between Cell 2 and 3, dikes, berms, and other relevant features. The White Mesa Mill is a "zero" discharge facility for process liquid wastes. The mill area has been designed to ensure that all spills or leaks from tanks will drain toward the lined tailings cells.

The tailings cells, in turn, are operated with sufficient freeboard (minimum of three feet) to withstand 100% of the PMP (Probable Maximum Precipitation). This allows for a maximum of 10 inches of rain at any given time.

1.4 DESCRIPTION OF BASINS:

Precipitation and unexpected spills on the mill property are contained within their respective drainage basins. Runoff would ultimately drain into one of the three (3) lined tailings cells.

1.4.1 Basin A1

Basin A1 is north of Cell 1-I and Diversion Ditch No. 1. The basin contains 23 acres, all of which drain into Westwater Creek. This area is not affected by mill operations.

1.4.2 Basin A2

Basin A2 contains all of Cell 1-I including an area south of the Diversion Ditch No. 1. The basin covers 84 acres. Any runoff from this basin would be contained within Cell 1-I.

1.4.3 Basin B1

Basin B1 is north of the mill property and is not affected by mill operations. The basin contains 45.4 tributary acres. Runoff from this basin drains into a flood retention area by flowing through Diversion Ditch No. 2. Diversion Ditch No. 2 drains into Westwater Creek.

1.4.4 Basin B2

Basin B2 is northeast of the mill and contains only 2.6 acres. Runoff from this basin would drain into Diversion Ditch No. 3. Diversion Ditch No. 3 ultimately drains into Diversion Ditch No. 2. This basin is not affected by mill operations.

1.4.5 Basin B3

Basin B3 contains most of the mill area, buildings, ore stockpiles, process storage tanks, retention ponds, spill containment structures, pipelines, and roadways. The normal direction of flow in this basin is from the northwest to the southwest. Any runoff from this basin would drain into Cell 1-I. The basin contains 64 acres. This basin has sufficient freeboard to withstand 100% of the PMP (Probable Maximum Precipitation). This allows 10 inches of rain for any given storm event.

1.4.6 Basin C

Basin C contains all of Cell 2. The basin consists of 80.7 acres. This basin contains earth stockpiles and the heavy equipment shop. The direction of flow in this basin is to the southwest. All runoff in this basin would be channeled along the southern edge of the basin. Runoff would then flow into Cell 3 via the spillway from Cell 2 to Cell 3.

1.4.7 Basin D

Basin D contains all of Cell 3. This basin consists of 78.3 acres including a portion of the slopes of the topsoil stockpile and random stockpile. The basin contains all flows, including those caused by the PMF.

1.4.8 Basin E

Basin E contains Cell 4A and consists of 43.3 acres. All anticipated flows including those caused by the PMF will be contained within the basin and will flow directly into Cell 4A.

1.5 POTENTIAL CHEMICAL SPILL SOURCES AND SPILL CONTAINMENT

This section details potential sources of chemical spills and "reportable quantities". For purposes of this SPCC, a "reportable quantity" will be defined as quantities listed below which could be expected to reach navigable waters of the United States. Reportable Quantities are those identified in 40 CFR Part 117 Table 117.3: "Reportable Quantities of Hazardous Substances Designated Pursuant to Section 311 of the Clean Water Act." It is not expected that any spill would reach navigable waters of the United States. However, if a spill of a volume listed below occurs, and remains on the mill site, which is the more likely scenario, then management is to be notified so that proper internal evaluations of the spill are made.

1.5.1 Reagent Tanks (Tank list included in Table 2.0)

1.5.2 Ammonia

The ammonia storage tanks consist of two tanks with a capacity of 31,409 gallons each. The tanks are located southeast of the Mill building.

Daily monitoring of the tanks for leaks and routine integrity inspections will be conducted to minimize the hazard associated with ammonia. The reportable quantity for an ammonia spill is 7 gallons.

Ammonia spills should be treated as gaseous. Ammonia vapors will be monitored closely to minimize the hazard associated with inhalation. If vapors are detected, efforts will be made to stop or repair the leak expeditiously. Ammonia is the only chemical (as vapor) that has the potential to leave the site.

1.5.3 Ammonia Meta Vanadate

Ammonia meta vanadate is present in the SX building as the process solutions move through the circuit to produce the vanadium end product. But, the primary focus will be on the transportation of this chemical. The reportable quantity for an ammonia meta vanadate spill is 1,000 pounds.

1.5.4 Caustic Storage (Sodium Hydroxide)

The caustic storage tank is located on a splash pad on the northwest corner of the SX building. The tank has a capacity of 19,904 gallons. The tank supports are mounted on a concrete curbed catchment pad that directs spills into the sand filter sump in the northwest corner of the SX building. The reportable quantity for a sodium hydroxide spill is 85 gallons.

1.5.5 Sodium Carbonate (Soda Ash)

The soda ash solution tank has a capacity of 16,921 gallons and is located in the northeast corner of the SX building. The smaller soda ash shift tank has a capacity of 8,530 gallons and is located in the SX building. Spills will be diverted into the boiler area, and would ultimately drain into Cell 1-I. There is no reportable quantity associated with a sodium carbonate spill.

1.5.6 Sodium Chlorate

Sodium chlorate tanks consist of two fiberglass tanks located within a dike east of the SX building. The larger tank is used for dilution purposes and has a maximum capacity of 17,700 gallons. The smaller tank serves as a storage tank and has a capacity of 10,500 gallons. Daily monitoring of the tanks for leaks and integrity inspections will be conducted to minimize the hazard associated with sodium chlorate.

Sodium chlorate that has dried and solidified becomes even more of a safety hazard due to its extremely flammable nature. The reportable quantity for a sodium chlorate spill is 400 gallons.

1.5.7 Sulfuric Acid

The sulfuric acid storage tanks consist of one large tank with the capacity of 1,600,000 gallons and two smaller tanks with capacities of 269,160 gallons each.

The large tank is located in the northwest corner of mill area basin B3 and is primarily used for acid storage and unloading. The tank support for the large tank is on a mound above a depression which would contain a significant spill. All flows resulting would be channeled to Cell 1-I. The tank is equipped with a high level audible alarm which sounds prior to tank overflows. A concrete spill catchment with a sump in the back provides added containment around the base of the tank. However, the catchment basin would not be able to handle a major tank failure such as a tank rupture. The resulting overflow would flow towards Cell 1-I.

The two smaller storage tanks are located within an equal volume spill containment dike east of the mill building. The tanks are not presently in use, but are equipped with high level audible alarms.

The reportable quantity for a sulfuric acid spill is 65 gallons (1,000 pounds).

1.5.8 Vanadium Pentoxide

Vanadium pentoxide is produced when vanadium is processed through the drying and fusing circuits and is not present in the vanadium circuit until after the deammoniator. Efforts will be made to minimize leaks or line breaks that may occur in processes in the circuit that contain vanadium pentoxide. Special care will be taken in the transportation of this chemical. The reportable quantity for a vanadium pentoxide spill is 1,000 pounds.

1.5.9 Kerosene (Organic)

The kerosene storage area is located in the central mill yard and has a combined capacity of 10,152 gallons in three tanks. Any overflow from these three tanks would flow around the south side of the SX building and then into Cell 1-I. These tanks have drain valves which remain locked unless personnel are supervising draining operations. The reportable quantity for a kerosene spill is 100 gallons.

1.6.0 Used/ Waste Oil

Used/ Waste oil for parts washing is located north of the maintenance shop in a tank and has a capacity of 5,000 gallons. The tank is contained within a concrete containment system. Ultimate disposal of the used oil is to an EPA permitted oil recycler. Any oil escaping the concrete containment system will be cleaned up. Soil contaminated with used oil will be excavated and disposed of in Cell 2.

1.6.1 Propane

The propane tank is located in the northwest corner of the mill yard and has a capacity of 30,000 gallons. Daily monitoring of the tank for leaks and integrity inspections will be conducted to minimize potential hazards associated with propane leaks. Propane leaks will be reported immediately. There is no reportable quantity associated with a propane spill.

1.7 POTENTIAL PETROLEUM SPILL SOURCES AND CONTAINMENT

This section details potential sources of petroleum spills and "reportable quantities". For purposes of this SPCC, a "reportable quantity" will be defined as quantities listed below which could be expected to reach navigable waters of the United States. It is not expected that any spill would reach navigable waters of the United States. However, if a spill of a volume listed below occurs, and remains on the mill site, which is the more likely scenario, then management is to be notified so that proper internal evaluations of the spill are made.

1.7.1 Petroleum Tanks

1.7.1.1 Diesel

Two diesel storage tanks are located north of the mill building. The tanks have capacities of 250 gallons each. One of the diesel tanks is for the emergency generator. The other tank is located in the pumphouse on an elevated stand. Spillage from either tank would ultimately flow into Cell 1-I. The reportable quantity for a diesel spill is 100 gallons.

1.7.2 Aboveground Fuel Pump Tanks

1.7.2.1 Diesel

The diesel tank is located on the east boundary of Basin B3 and has a capacity of 6,000 gallons. The tank is contained within a concrete catchment pad. The reportable quantity for a diesel spill is 100 gallons.

1.7.2.2 Unleaded Gasoline

The unleaded gasoline tank is located next to the diesel tank. The unleaded gasoline tank has a capacity of 3,000 gallons and is contained within the same containment system as the diesel tank. The reportable quantity for an unleaded gasoline spill is 100 gallons.

1.7.2.3 Pump Station

Both the diesel and the unleaded gasoline tanks will be used for refueling company vehicles used around the mill site. The pump station is equipped with an emergency shut-off device in case of overflow during fueling. In addition, the station is also equipped with a piston leak detector and emergency vent. Check valves are present along with a tank monitor console with a leak detection system. The catchment is able to handle a complete failure of one tank. However, if both tanks failed the concrete catchment pad would not be able to contain the spill. In this case, a temporary berm would need to be constructed. Absorbent diapers or floor sweep would be used in an effort to limit and contain the spill. The soil would be cleaned up and placed in the authorized disposal area in Cell 2.

1.7. 2.4 Truck Unloading

In the event of a truck accident resulting in an overturned vehicle in the mill area, proper reporting and containment procedures will be followed when warranted, such as when oil or diesel fuel is spilled. Proper clean-up procedures will be followed to minimize or limit the spill. The spill may be temporarily bermed or localized with absorbent compounds. Any soils contaminated with diesel fuel or oil will be cleaned up and placed in the authorized disposal area in Cell 2.

1.8 SPILL DISCOVERY AND REMEDIAL ACTION

Once a chemical or petroleum spill has been detected, it is important to take measures to limit additional spillage and contain the spill that has already occurred. Chemical or petroleum spills will be handled as follows:

The Shift Foreman will direct efforts to shut down systems, if possible, to limit further release.

The Shift Foreman will also secure help if operators are requiring additional assistance to contain the spill.

The Shift Foreman is also obligated to initiate reporting procedures.

Once control measures have begun and personal danger is minimized, the Shift Foreman will notify the Production Superintendent, Maintenance Superintendent, or Mill Manager.

The Production or Maintenance Superintendent will notify the Mill Manager, who in turn will notify the Environmental Health and Safety Manager.

The Mill Manager will assess the spill and related damage and direct remedial actions. The corrective actions may include repairs, clean-up, disposal, and company notifications. Government notifications may be necessary in some cases.

If a major spill continues uncontrolled, these alternatives will be considered.:

1. Construct soil dikes or a pit using heavy equipment.
2. Construct a diversion channel into an existing pond.
3. Start pumping the spill into an existing tank or pond.
4. Plan further clean-up and decontamination measures.

1.9 SPILL INCIDENT NOTIFICATION

1.9.1 External Notification

As stated in Section 1.1, spills are not expected to reach navigable waters of the United States. If a spill of a "reportable quantity" occurs, then mill and corporate management must be notified and they will evaluate whether or not the following agencies must be notified:

- | | |
|---|------------------------------|
| 1. EPA National Response Center | 1-800-424-8802 |
| 2. State of Utah, Department of Environmental
Quality, Division of Radiation Control | 801/536-4250 |
| 3. State of Utah
Water Quality Division | 801/538-7200
801/538-6146 |

In case of a tailings dam failure, contact the following agencies:

- | | |
|---|--------------|
| 1. State of Utah, Department of Environmental
Quality, Division of Radiation Control | 801/536-4250 |
| 2. State of Utah, Natural Resources | 801/538-7200 |

1.9.2 Internal Notification

Internal reporting requirements for incidents, spills, and significant spills are as follows:

Report Immediately

Event Criteria:

1. Release of toxic or hazardous substances
2. Fire, explosions, and accidents
3. Government investigations, information requests, or enforcement actions
4. Private actions or claims (corporate or employee)
5. Deviations from corporate policies or government requirements by management

Which have or could result in the following:

1. Death, serious injury, or adverse health effects
2. Property damage exceeding \$1,000,000

3. Government investigation or enforcement action which limits operations or assesses penalties of \$100,000 or more
4. Publicity resulted or anticipated
5. Substantial media coverage

Report At The Beginning Of The Next Day

Event Criteria:

1. Was reported to a government agency as required by law
2. Worker (employee or contractor) recordable injury or illness associated with a release
3. Community impact-reported or awareness
4. Publicity resulted or anticipated
5. Release exceeding the reportable quantities listed in Section 1.5, for each specific process material, waste, or by-product

In the event of a spill of a reportable quantity, the Mill Manager is required to call the Corporate Environmental Manager or the President and Chief Executive Officer. The individual first discovering the spill will report it to the Shift Foreman, Production Superintendent or Maintenance Superintendent, who will in turn ensure that the Mill Manager is notified. The Environmental Health and Safety Manager will also be contacted by the Mill Manager.

<u>Name</u>	<u>Title</u>	<u>Home Phone</u>
<u>Mill Personnel:</u>		
Richard E. Bartlett	Interim Mill Manager	(435) 678-2495
Wade Hancock	Maintenance Foreman	(435) 678-2753
David E. Turk	Environmental Health and Safety Manager	(435) 678-7802
N/A	Production Superintendent	
N/A	Maintenance Foreman	
Scot Christensen	Mill Shift Foreman	(435) 678-2015
<u>Corporate Personnel:</u>		
Ronald F. Hochstein	President and Chief Operating Officer	(604) 377-1167
David C. Frydenlund	Vice President and General Counsel	(303) 221-0098

In the event the next person in the chain-of-command cannot be reached, then proceed up the chain-of-command to the next level. Table 1.0 shows the organizational chart for the mill site.

1.10 RECORDS AND REPORTS

The following reports and records are to be maintained in Central Files by the Environmental Health and Safety Manager for inspection and review for a minimum of three years:

1. Record of site monitoring inspections
 - a. Daily Tailings Inspection Data
 - b. Weekly Tailings Inspection and Survey
 - c. Monthly Tailings Inspection, Pipeline thickness
 - d. Quarterly Tailings Inspection
2. Tank to soil potential measurements
3. Annual bulk oil and fuel tank visual inspections
4. Tank and pipeline thickness tests
5. Quarterly and annual PCB transformer inspections (if transformer contains PCBs)
6. Tank supports and foundation inspections
7. Spill Incident Reports
8. Latest revision of SPCC plan

1.11 PERSONNEL TRAINING AND SPILL PREVENTION PROCEDURES

All new employees are instructed on spills at the time they are employed and trained. They are briefed on chemical and petroleum spill prevention and control. They are informed that leaks in piping, valves, and sudden discharges from tanks should be reported immediately. Abnormal flows from ditches or impoundments are of immediate concern. In addition, a safety meeting is presented annually by the Environmental Health and Safety Manager to review the SPCC plan.

1.11.1 Training Records

Employee training records on chemical and petroleum spill prevention are maintained in the general safety training files.

1.11.2 Monitoring Reports

Shift logs shall provide a checklist for inspection items.

1.12 REVISION

This procedure is to be reviewed by the mill staff and a registered professional engineer at least once every three years, and updated when circumstances warrant a revision.

1.13 Summary

Below is a table listing the specific reportable quantities associated with the major chemical and petroleum products on-site.

CHEMICAL	REPORTABLE QUANTITY (RQ)
AMMONIA	100 POUNDS
AMV	1,000 POUNDS
SODIUM HYDROXIDE	1,000 POUNDS
SODA ASH	No Reportable Quantity
SODIUM CHLORATE	400 GALLONS
SULFURIC ACID	1,000 POUNDS
VANADIUM PENTOXIDE	1,000 POUNDS
KEROSENE	100 GALLONS
OIL	No Reportable Quantity
PROPANE	No Reportable Quantity
DIESEL & UNLEADED FUEL	100 GALLONS

1.14 MILL MANAGER APPROVAL

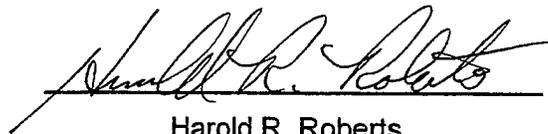
I hereby certify that I have reviewed the foregoing chemical and petroleum product SPCC plan, that I am familiar with the International Uranium (USA) Corporation White Mesa Mill facilities, and attest that this SPCC plan has been prepared in accordance with the Standard Operating Procedures currently in effect.



Richard E. Bartlett
Interim Mill Manager

1.15 CERTIFICATION BY REGISTERED PROFESSIONAL ENGINEER

I hereby certify that I have reviewed the foregoing chemical and petroleum product SPCC plan, that I am familiar with the International Uranium (USA) Corporation White Mesa Mill facilities, and attest that this SPCC plan has been prepared in accordance with good engineering practices.



Harold R. Roberts
Registered Professional Engineer
State of Utah No. 165838



TABLES

**Table 1
White Mesa Mill Management Personnel
Responsible for Implementing This BMPP**

Mill Staff

<u>Personnel</u>	<u>Title</u>	<u>Work Phone</u>	<u>Home Phone/ Other Contact Number</u>
Rich E. Bartlett	Interim Mill Manager	435-678-2221 Ext. 105	435 678-2495
Wade Hancock	Maintenance Foreman	435-678-2221 Ext.166	435 678-2753
Scot Christensen	Mill Foreman	435-678-2221	435 678-2015
David E. Turk	Radiation Safety Officer	435-678-2221 Ext. 113	435 678-7802

Corporate Management Staff

<u>Personnel</u>	<u>Title</u>	<u>Work Phone</u>	<u>Home Phone/ Other Contact Number</u>
Ron F. Hochstein	President/ Chief Operating Officer	604 806-3589	Cell: 604 377-1167
David C. Frydenlund	Vice President and General Counsel	303 389-4130	303 221-0098 Cell: 303 808-6648

**TABLE 2.0
REAGENT TANK LIST**

QUANTITY	REAGENT	CAPACITY (GAL)
2	DIESEL	250
3	KEROSENE	10,152
1	USED/WASTE OIL	5,000
1	DIESEL	6,000
1	UNLEADED	3,000
1	PROPANE	30,000
2	AMMONIA	31,409
1	SODIUM HYDROXIDE	19,904
1	SODA ASH SOLUTION	16,921
1	SODA ASH SHIFT	8,530
1	SODIUM CHLORATE	17,700
1	SODIUM CHLORATE	10,500
1	SULFURIC ACID	1,600,000
2	SULFURIC ACID	269,160

**TABLE 3.0
LABORATORY CHEMICAL INVENTORY LIST¹**

<u>Chemical in Lab</u>	<u>RQ²</u>	<u>Quantity In Stock</u>
Aluminum nitrate	2,270 kg	1.8 kg
Ammonium bifluoride	45.4 kg	2.27 kg
Ammonium chloride	2,270 kg	2.27 kg
Ammonium oxalate	2,270 kg	6.8 kg
Ammonium thiocyanate	2,270 kg	7.8 kg
Antimony potassium tartrate	45.4 kg	0.454 kg
n-Butyl acetate	2,270 kg	4 L
Carbon tetrachloride	4.54 kg	1.0 L
Cyclohexane	454 kg	24 L
Ferric chloride	454 kg	6.810 kg
Ferrous ammonium sulfate	454 kg	0.57 kg
Potassium chromate	4.54 kg	0.114 kg
Sodium nitrite	45.4 kg	2.5 kg
Sodium phosphate tribasic	2,270 kg	1.4 kg
Zinc acetate	454 kg	0.91 kg

<u>Chemical in Volatiles and Flammables Lockers (A,B,C)</u>	<u>RQ²</u>	<u>Quantity In Stock</u>
Chloroform	4.54 kg	8 L
Formaldehyde	45.4 kg	<1L of 37% solution
Nitrobenzene	454 kg	12 L
Toluene	454 kg	12 L

<u>Chemical in Acid Shed</u>	<u>RQ²</u>	<u>Quantity In Stock</u>
Chloroform	4.54 kg	55 gal
Hydrochloric acid	2,270 kg	58 gal
Nitric acid	454 kg	5 L
Phosphoric acid	2,270 kg	10 L
Sulfuric acid	454 kg	25 L
Hydrofluoric Acid	45.4 kg	1 L
Ammonium hydroxide	454 kg	18 L

1. This list identifies chemicals which are regulated as hazardous substances under the Federal Water Pollution Control Act 40 CFR Part 117. The lab also stores small quantities of other materials that are not hazardous substances per the above regulation.
2. Reportable Quantities are those identified in 40 CFR Part 117 Table 117.3: "Reportable Quantities of Hazardous Substances Designated Pursuant to Section 311 of the Clean Water Act."

**TABLE 4.0
REAGENT YARD/SMALL QUANTITY CHEMICALS LIST ¹**

CHEMICAL	RQ²	QUANTITY IN STORAGE COMPOUND
Acetic Acid, Glacial	1,000 lbs	4 gal
Ammonium Hydroxide	1,000 lbs	5L
Carbon Disulfide	100 lbs	0 lbs
Calcium Hypochlorite	10 lbs	2 kg (4.4 lbs)
Chlorine	10 lbs	0 lbs
Ferrous Sulfate Heptahydrate	1,000 lbs	5 kg (11lbs)
Hydrochloric Acid	5,000 lbs	60 gal of 40% solution
Nitric Acid	1,000 lbs	10 L
Potassium Permanganate 0.1 N	32 gal	5 kg (11 lbs)
Sodium Hypochlorite 5.5%	100 lbs	2 kg (11 lbs) of 5.5% solution
Silver Nitrate	1 lb	0 lbs
Trichloroethylene	100 lb	2 L
Xylene (Mixed Isomers)	100 lbs	0 lbs

1. This list identifies chemicals which are regulated as hazardous substances under the Federal Water Pollution Control Act 40 CFR Part 117. Materials in this list are stored in a locked storage compound near the bulk storage tank area. The Mill also stores small quantities of other materials that are not hazardous substances per the above regulation.
2. Reportable Quantities are those identified in 40 CFR Part 117 Table 117.3: "Reportable Quantities of Hazardous Substances Designated Pursuant to Section 311 of the Clean Water Act."

**TABLE 5.0
REAGENT YARD/BULK CHEMICALS LIST¹**

REAGENT	RQ²	QUANTITY IN REAGENT YARD
Sulfuric Acid	1,000 lbs	9,000,000 lbs
Floc #301	None	1,200 lbs
Hyperfloc 102	None	1,500 lbs
Ammonia – East Tank	100 lbs	0 lbs
Ammonia – West Tank	100 lbs	105,000 lbs
Kerosene	100 gal	500 gal
Salt (Bags)	None	2,000 lbs
Ammonium Hydrogendifluoride	None	20,450 lbs
Soda Ash Dense (Bag)	None	0 lbs
Phosphoric Acid	5,000 lbs	6,300 lbs
Polyox	None	490 lbs
Millsperser	None	1,410 lbs
Nalco TX760	None	9 barrels
Nalco 7200	None	1,590 lbs
Tributyl phosphate	None	9,450 lbs
Distillates	None	100 gal
Diesel	100 gal	Approx. 3300 gal
Gasoline	100 gal	Approx. 6000 gal
Alamine 336 drums	None	0 lbs
Floc 109	None	0 lbs
Floc 208	None	0 lbs
Floc 904	None	0 lbs
Hyperfloc 624	None	0 lbs
Salt (Bulk solids)	None	0 lbs
Salt (Bulk solutions)	None	0 lbs
Caustic Soda	1,000 lbs	0 lbs
Ammonium Sulfate	None	0 lbs
Sodium Chlorate	None	20,000 lbs
Alamine 335 Bulk	None	0 lbs
Alamine 310 Bulk	None	0 lbs
Isodecanol	None	0 lbs
Vanadium Pentoxide ³	1000 lbs	30,000 lbs
Yellowcake ³	None	< 100,000 lbs
Ammonia Meta Vanadate	1000 lbs	0 lbs

1. This list identifies all chemicals in the reagent yard whether or not they are regulated as hazardous substances under the Federal Water Pollution Control Act 40 CFR Part 117.
2. Reportable Quantities are those identified in 40 CFR Part 117 Table 117.3: "Reportable Quantities of Hazardous Substances Designated Pursuant to Section 311 of the Clean Water Act."
3. Vanadium Pentoxide and Yellowcake, the Mill's products, are not stored in the Reagent Yard itself, but are present in closed containers in the Mill Building and/or Mill Yard.

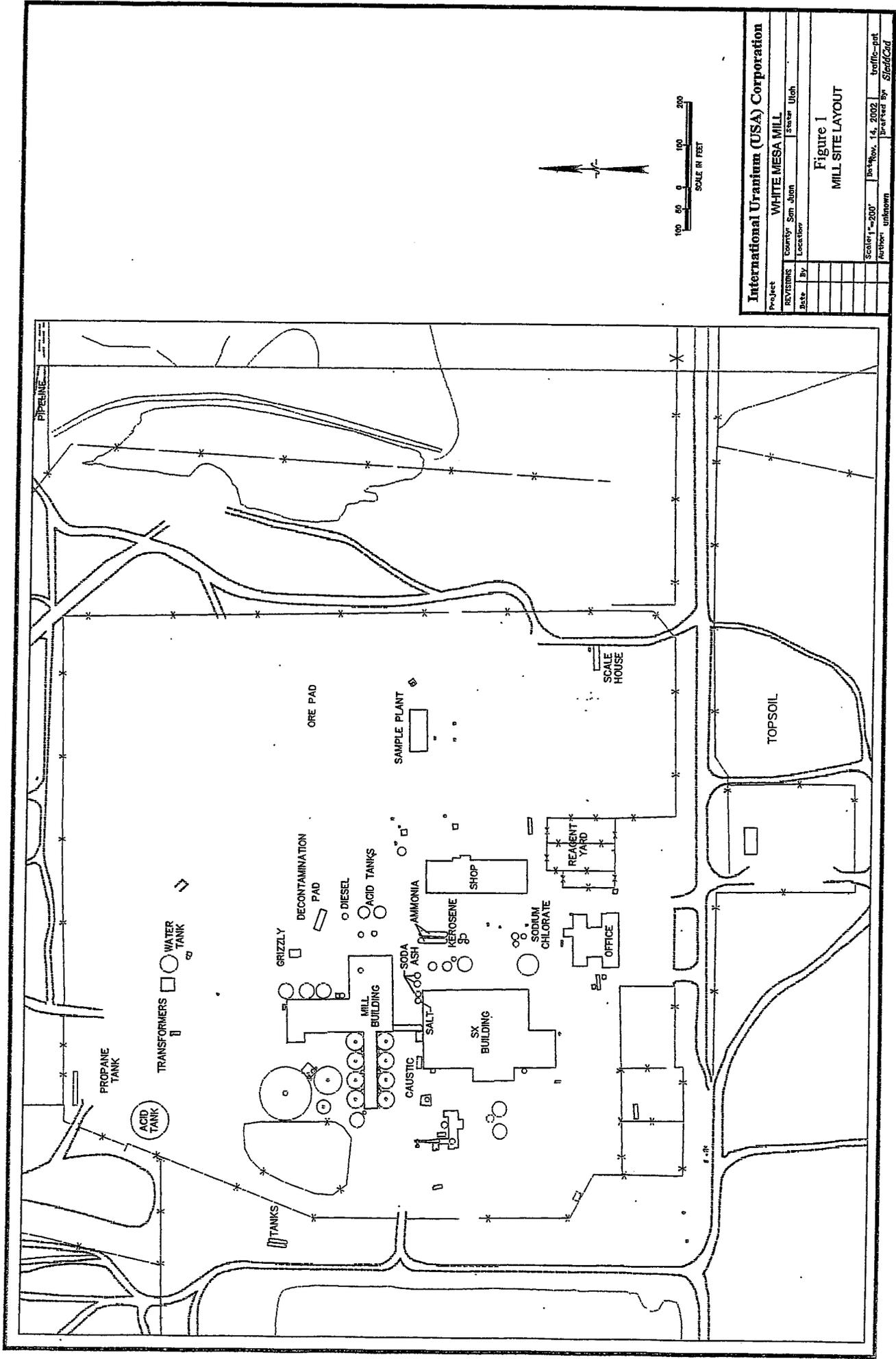
**TABLE 6.0
PETROLEUM PRODUCTS AND SOLVENTS LIST¹**

PRODUCT	RQ	QUANTITY IN WAREHOUSE
Lubricating Oils in 55 gallon drums	100 gal	1,540 gallons
Transmission Oils	100 gal	0 gallons
Water Soluble Oils	100 gal	30 gallons
Xylene (mixed isomers)	100 lbs	0 gallons
Toluene	1000 lbs	0 gallons
Varsol Solvent (2% trimethyl benzene in petroleum distillates)	100 gal	0 gallons

1. This list includes all solvents and petroleum-based products in the Mill warehouse petroleum and chemical storage aisles.
2. Reportable Quantities are those identified in 40 CFR Part 117 Table 117.3: "Reportable Quantities of Hazardous Substances Designated Pursuant to Section 311 of the Clean Water Act."

FIGURES

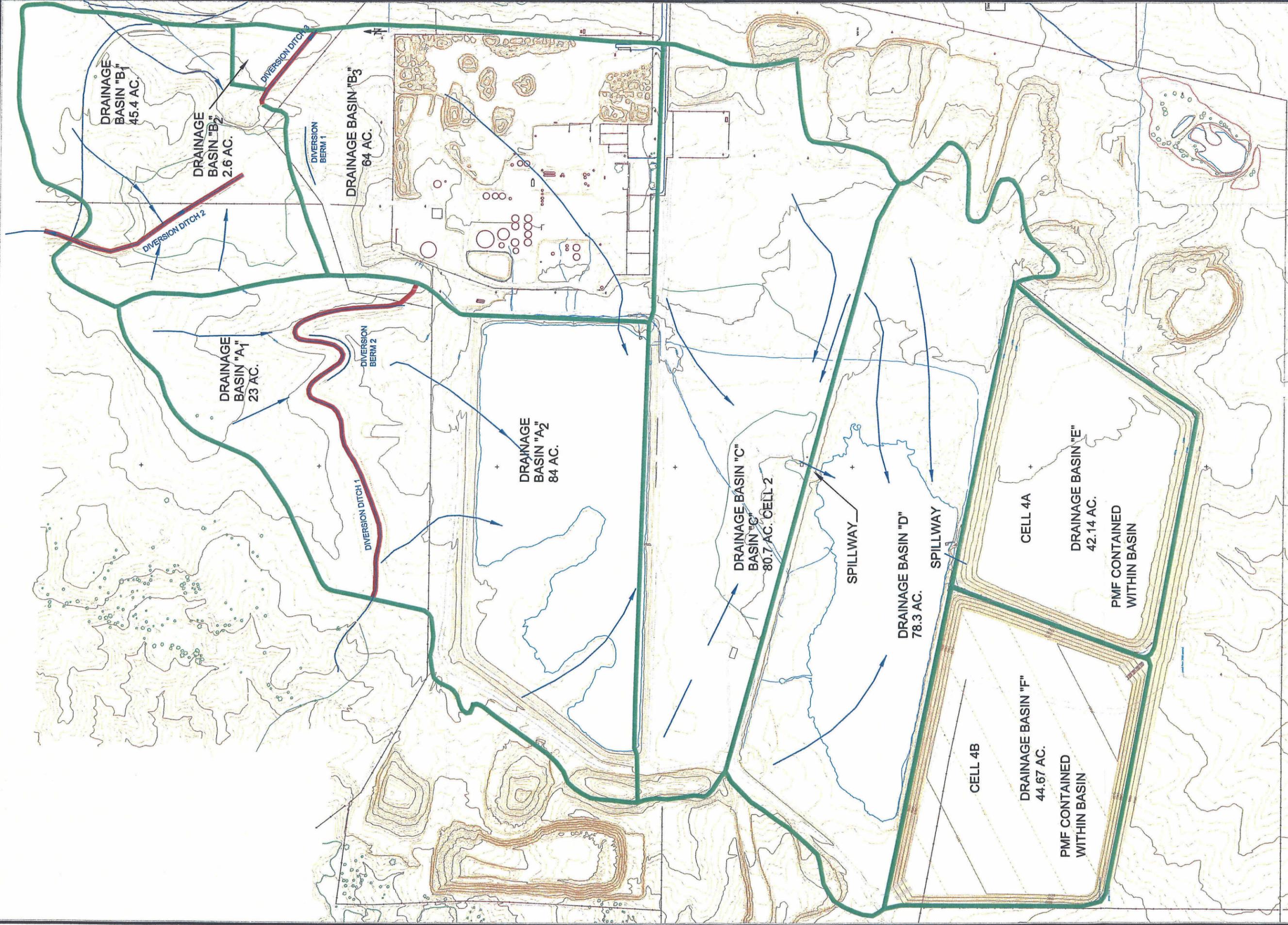
Figure 1
White Mesa Mill
Mill Site Layout



International Uranium (USA) Corporation	
Project	WHITE MESA MILL
County	San Juan
Location	Utah
Scale	1" = 200'
Date	Nov. 14, 2002
Author	unknown
Drawn by	Sheldahl

Figure 1
MILL SITE LAYOUT

Figure 2
White Mesa Mill
Mill Site Drainage Basins



- Surface Water Flow
- Drainage Basins
- Diversion Ditches
- Diversion Berm

Denison Mines (USA) Corp.
WHITE MESA MILL

Project: **WHITE MESA MILL** State: Utah

REVISIONS	By	Date
	BM	2/15/07
	BM	10/24/07
	BM	05/16/08
	BM	06/11/08
	DLS	12/9/08
	BM	1/7/09

County: San Juan Location: Utah

Mill Site Drainage Basins

Scale: 1" = 2000ft Date: 2005 figure 2_1-6-09.dwg
 Author: HRR Drafted By: unknown

APPENDIX 2

**WHITE MESA MILL
EMERGENCY RESPONSE PLAN**

EMERGENCY RESPONSE PLAN REVISION 1.1

Denison Mines (USA) Corp.
White Mesa Mill
Blanding, Utah

April 14, 1986

REVISED
February 16, 2007

Distribution List:

1. Ron F. Hochstein
2. Rich E. Bartlett
3. David Turk
4. Michael Spillman
5. Mill Shift Foremen
6. Blanding Fire Department
7. San Juan County EMS Coordinator
8. State of Utah, Department of Radiation Control

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1. INTRODUCTION

This Emergency Response Plan is written not only to comply with Federal, State and local regulations, but even more importantly to reduce the risk to our employees and that of the community in regards to Health, Safety and Environmental Emergencies.

This plan includes the following:

- evaluation of the potential risks for fire, explosions, gas releases, chemical spills and floods (including tailings dam failure);
- specific emergency programs for each potential event;
- definition of administrative response actions; and,
- definition of the emergency response contacts - both internal and external.

The White Mesa Mill (the "Mill") operates under the following regulatory agencies:

- Utah State Department of Environmental Quality, Division of Radiation Control;
- Mine Safety and Health Administration;
- Environmental Protection Agency;
- Utah State Department of Environmental Quality, Division of Air Quality; and,
- Utah State Division of Natural Resources Bureau of Dam Safety.

2. WHITE MESA MILL OVERVIEW

The Mill processes conventional uranium or uranium/vanadium ores to recover uranium and vanadium. In addition to the processing of conventional ores, the Mill also processes alternate feed materials using similar process steps and chemicals. The conventional ore is stored on the Ore Pad (shown in Exhibit 3). Alternate feed materials are also stored on the Ore Pad and may be stored in bulk form, lined burrito bags, liners or drums. The descriptions of each alternate feed material are maintained by the Mill's Radiation Safety Officer.

The Mill utilizes a semi-autogenous grind circuit followed by a hot sulfuric acid leach and a solvent extraction process to extract uranium and vanadium from ores, using large amounts of sulfuric acid, sodium chlorate, kerosene, amines, ammonia and caustic soda in the process. The reagent storage tank locations are described in further detail in Section 4.6.

Emissions from the Mill process are in the form of air emissions from exhaust stacks and solid/liquid tailings which are stored in the Mill's tailings cells located west/southwest of the main Mill building. The major exhaust stack parameters are shown in the following table.

Description	Height (ft from surface)	Diameter (inches)	Estimated Flow Rate (cfm)
Leach Exhaust	~100	36	13,700
Yellow Cake Drying (3 stacks)	~85	18	4,000 per stack
Vanadium Roasting & Fusion	~85	38	4100

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There are also smaller exhaust stacks associated with the Laboratory in the Mill Administration building and the boiler exhaust stack.

The Mill's tailings cells are comprised of four below grade engineered cells, Cell 1-I, 2, 3 and 4A. Liquids are stored in Cell 1-I and Cell 3, the active tailings cell. The liquid in the tailings cells is very acidic. In addition to the tailings cells, there is also an emergency lined catchment basin west of the Mill building. Solutions in this basin or the tailings cells should not be used to fight fires in the Mill facility.

The products of the Mill include ammonium metavanadate (AMV), vanadium pregnant liquor (VPL), vanadium pentoxide (V_2O_5), and yellowcake, or uranium concentrate (U_3O_8). The V_2O_5 and U_3O_8 products are packaged in steel drums for shipment. The AMV is packaged in either steel drums or super-saks while the VPL is sold in liquid form in bulk.

Master files containing Material Safety Data Sheets for all materials in use at the Mill are maintained at the Safety Office, Mill Maintenance Office, Mill Laboratory and Mill Central Control Room. Copies are also on file at the Blanding Clinic, Doctor's Offices, Blanding Fire House and Office of the San Juan County Emergency Medical Coordinator.

The nearest residence to the Mill is approximately one mile to the north of the Mill, the next is a residence approximately two miles north of the Mill, followed by the community of White Mesa, about 3.5 miles to the south. The City of Blanding is located approximately 6 miles to the northeast.

The Mill site is near Utah State Highway 191 and can be accessed by a paved access road from the highway to the Mill facilities.

3. PLAN OBJECTIVES

The primary objectives of this plan are:

1. To **save lives, prevent injuries**, prevent panic, and minimize property/environmental damage to the lowest possible level.
2. To evacuate and account for all people in the area including visitors, truck drivers, contractors, etc.
3. To provide assembly areas that are as safe as possible and which can be reached without traveling through a hazardous area. Assembly areas will be properly manned to deal with sick or injured persons, and provisions will be made to evacuate those persons to proper shelter.
4. To make adequately trained personnel available to cope with rescue and recovery operations as directed by the Incident Commander.

4. DESCRIPTION OF FACILITIES

The Mill facilities are shown on the Site Layout Map included as Exhibit 3.

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4.1 Fire Water Supply and Alarm Systems

4.1.1 Fire Water Supply

The fire water supply facilities include:

- 400,000 gallon Storage Tank of which 250,000 gallons are reserved for fire emergencies
- Centrifugal diesel driven pump rated at 2,000 gpm at 100 psi. This pump starts automatically when the pressure in the fire main drops below 100 psi (See Figure 1, Fire System Schematic).

When more water is needed for an emergency an additional source is the Recapture Reservoir supply pipeline, which can be utilized in emergencies at a rate of about 1,200 gpm.

4.1.2 Alarm System

The alarm systems include the following:

- public address system
- hand held radios
- siren.

4.2 Office Building and Laboratory

4.2.1 Office Building

The office building (approximately 10,000 square feet) contains the administration offices, radiation health and safety offices and the Mill laboratory. The central file vault and the main computer system are also in this building. The ambulance is kept on the west side of the office building near the safety office entrance.

4.2.2 Laboratory

The laboratory facilities contain the following:

- three flammable cabinets (keys required)
- chemical storage room south of main lab
- six fume hoods - hoods 1,2, 3 and 4 are in the center of the laboratory and hoods 5 and 6 are along the west wall. Hoods 1 and 2 are no longer in service. Hoods 3 and 4 are on the west side, 1 and 2 are on the east side of the center cluster of hoods with 2 being in front. Only hoods 5 and 6 may be used for perchloric acid.
- outside laboratory chemical storage north of office building (key required)
- perchloric acid storage vault located underground west of office building (key required)

A wide variety of chemicals in small quantities are located in the laboratory. These chemicals range from acids to bases along with flammable metal compounds and peroxide forming compounds. Oxidizers and organic chemicals, which have a strong potential of producing harmful vapors if the containers are damaged to the point that the chemicals are exposed are stored in a storage room in the laboratory. There are no acids stored in this storage room. The acids (including but not limited to sulfuric, nitric, acetic, perchloric, phosphoric and hydrochloric acids) are stored in the main laboratory area in 2.5 liter or 500-ml bottles. MSDS books for all

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chemicals in the laboratory are located in the Laboratory, Safety Department, Mill Maintenance office and Mill Central Control room.

4.2.3 Electrical

Electrical transformers and electrical switches are located in the laboratory at the east end of the chemical storage room.

4.2.4 Fire Protection System

The fire protection systems in the office building and laboratory include:

- a fire hose station located on the east end of the office building. The station includes two sets of turnout gear, two SCBA units and Incident Commander materials.
- automatic "wet" sprinkler system which is actuated at 212° F
- portable dry chemical extinguishers strategically located throughout the building.

4.3 Solvent Extraction Building

The solvent extraction (SX) building (approximately 21,000 square feet) houses the uranium and vanadium solvent extraction circuits and the ELUEX circuit. The SX circuits may contain up to 200,000 gallons kerosene (757,000 liters) which has a flash point of 185° F.

Associated equipment in the SX building includes a temporary boiler located at the southwest end of the SX building which maintains the temperature for the fire system.

Chemicals which may be encountered in the SX building include:

- Kerosene
- Caustic Soda
- Anhydrous Ammonia
- Sulfuric Acid
- Salt (Brine)
- Soda Ash
- Ammonium Sulfate
- Amines
- Alcohol
- Sodium Chlorate
- Sodium Vanadate
- Propane

The VPL product is stored in the SX building.

4.3.1 Electrical

All electrical switches are located outside in the MCC room north of the SX building. The main control panel for all of the equipment is located in the Central Control Room in the main Mill building.

4.3.2 Fire Protection System

The SX building fire protection systems include:

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- a “wet” AFFF foam sprinkler system with heat actuated sprinkler heads that release at 212°F.
- portable dry chemical extinguishers strategically located throughout the building.

For fire hydrant and hose cabinet locations in the SX building refer to the Fire System Schematic included as Figure 1 in this Plan.

4.4 Mill Building

The mill building (approximately 22,000 square feet) contains process equipment related to grind, leach, counter current decantation, precipitation, drying and packaging of uranium and vanadium products.

Chemicals which may be encountered in the mill building include:

- Caustic Soda
- Anhydrous Ammonia
- Sulfuric Acid
- Soda Ash
- Ammonium Sulfate
- Sodium Chlorate
- Sodium Vanadate
- Propane

The finished products which are contained in the mill building include AMV, V_2O_5 and U_3O_8 (or yellowcake).

4.4.1 Electrical

The main electrical switch gear is located west of the SAG mill on the ground floor in the north west corner of the mill building. Circuit control panels are located in the SAG mill control room, the central control room, the vanadium roaster control room and the AMV area.

4.4.2 Fire Protection System

The main mill building fire protection systems include:

- portable dry chemical extinguishers strategically located throughout the building.
- water hoses throughout the building.

For fire hydrant and hose cabinet locations in the Mill building refer to the Fire System Schematic included as Figure 1 of this Plan.

4.5 Maintenance Shop/Warehouse/Change Room Building

This building (approximately 20,000 square feet) contains the main maintenance shop area (located on the north end of the building), the main warehouse (located on the south end of the building) and the personnel change rooms and lunch/training room (located on the extreme south end of the building on the ground and second floors).

Within the maintenance shop area are the following work area and specialty shops:

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- the main maintenance shop area contains welding and cutting equipment, lathes, presses, and drill presses.
- a carpenter shop which contains various saws and planes. Fiberglass work is also done within this shop area and it is located at the northwest end of the maintenance shop area.
- an electrical shop which is located south of the carpenter shop.
- a heavy equipment maintenance shop area is located at the north end of the maintenance shop in the center of the building.
- a rubber room for rubber lining of equipment is located east of the equipment shop area.
- the maintenance shop office, instrument shop and tool room are located at the south end of the maintenance shop area.

The warehouse area contains primarily dry good storage for repair parts and consumables for the operation of the Mill. There is an electrical water heater for the change room which is located in the warehouse area at the south end.

Within the warehouse and maintenance shops there are some oils and chemicals stored in the following locations:

- small quantities of flammable material such as starting fluid and spray paint are kept in the warehouse.
- drums of new oil and anti-freeze are stored along the east wall of the equipment maintenance area and on the east side of the warehouse on oil storage racks.
- used oil is stored in a tank located northeast of the equipment shop. The tank has a capacity of approximately 5,800 gallons.
- in the main maintenance shop area and the rubber room there are flammable storage cabinets and east of the warehouse there is a trailer which is used to store flammable items such as rubber cements, paints and fiberglass resins.
- compressed gas cylinder storage, both empty and full is located outside, east of the maintenance shop.

4.5.1 Electrical

The main electrical circuit breaker for the maintenance shop and warehouse building is located on the east wall inside the Maintenance shop. Auxiliary electrical panels for the change room and warehouse are located in the southwest corner of the warehouse area.

4.5.2 Fire Protection System

The fire protection system within the maintenance shop/warehouse/change room building includes:

- “wet” automatic sprinkler system that releases at 212° F.
- portable dry chemical extinguishers strategically located throughout the maintenance area, warehouse area and the change room and lunch room.

For fire hydrant and hose cabinet locations refer to the Fire System Schematic (Figure 1).

4.6 Reagent and Fuel Storage

The following lists the reagents and fuel stored at the Mill site:

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- a sulfuric acid tank located northwest of the mill building which has a capacity of approximately 1.4 million gallons.
- a storage tank for propane is located on the north edge of the mill site, northwest of the mill building. It has a storage capacity of 30,000 gallons.
- four sodium chlorate tanks located east of SX building, north of the office building and east of the pulp storage tanks. The two tanks east of the SX building are for sodium chlorate storage and the other two tanks are for dilution of the sodium chlorate.
- two anhydrous ammonia tanks located east of the SX building, with capacity of 31,409 gallons each.
- three kerosene tanks located east of the SX building, with a capacity of 10,152 gallons each.
- one caustic soda tank north of the SX building, with a capacity of 19,904 gallons.
- three soda ash tanks which are located east of the SX building. One tank is the dry soda ash tank with a capacity of 70,256 gallons. Two of the tanks are soda ash dilution tanks with capacities of 16,921 gallons each.
- diesel fuel and gasoline are stored in two tanks located on the eastern side of the ore pad. The gasoline storage capacity is 3,200 gallons, while diesel storage capacity is 8,000 gallons.

Other reagents are stored in steel barrels or super sacs in a reagent yard located east of the office building. Typical reagents which are stored in this yard include:

- polymers and flocculants
- boiler feed water chemicals
- methanol
- tributyl phosphate
- "dirty" soda ash and ammonium sulfate
- SX amines and emulsion breakers
- decyl alcohol
- minimal amounts of acid in barrels
- used oil in drums and overpacks

4.7 Boiler Facilities

The main building (approximately 12,400 square feet) is located on the west side of the Mill site and contains air compressors and water treatment facilities. To the north of the main building is a building which houses a propane-fired boiler. The vanadium oxidation tank, oxidation thickener, and pH adjustment tank are located south of the boiler house facilities.

4.7.1 Electrical

The main electrical panel for the boiler house is located outside of the building, on the south wall.

4.7.2 Fire Protection System

The fire protection system for the boiler facilities is comprised of strategically located portable dry chemical extinguishers.

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4.8 Sample Plant

The sample plant building (approximately 8,000 square feet) is located on the ore pad, east of the maintenance shop/warehouse building. The sampling plant equipment has been removed from the building and it is currently used as a storage area for maintenance.

4.8.1 Electrical

The electrical panel for this building is located on the east wall upstairs.

4.8.2 Fire Protection System

There are no extinguishers or sprinkler systems in the sample plant.

5. ORGANIZATION AND RESPONSIBILITIES

The organizational chart for an emergency situation is illustrated in Figure 2.

5.1 Mill Manager/Incident Commander

The Incident Commander has the responsibility for:

- preparing an Emergency Plan
- communicating the Plan,
- directing activities during emergencies; and,
- reporting to local, State and Federal authorities.

The Incident Commander will stop routine radio usage upon learning of an emergency and set up the base station in a safe location for directing activities. Radio usage will be limited to the emergency. The Incident Commander has the responsibility to contact all outside services.

The Incident Commander has the responsibility to account for all employees at the Mill, using the assistance of supervisors and/or any International Uranium (USA) Corporation ("IUSA") personnel. The Incident Commander has the responsibility for the news media and reports directly to the President of IUSA.

5.2 Mill General Superintendent

The Mill General Superintendent has the responsibility of directing outside emergency personnel and has the responsibility for plant security and will report directly to the Incident Commander. The Mill General Superintendent will act as Incident Commander in the absence of the Mill Manager.

5.3 Radiation Safety Officer/Fire Chief

The Radiation Safety Officer will direct rescue operations and provide the necessary emergency medical personnel and facilities to cope with the emergency. Adequately trained fire crews and operable emergency equipment will be maintained at all times.

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As Fire Chief, the Radiation Safety Officer has the responsibility to maintain trained fire crews and operable equipment, mobilize and direct the fire crews and equipment in a fire emergency or one containing the threat of fire, and to assist in evacuation and rescue or recovery operations.

In the absence of the Radiation Safety Officer, the Mill Safety Coordinator will assume these duties.

5.4 Maintenance Supervisor

The Maintenance Supervisor will direct all personnel in evacuation and in activities to cope with the emergency, including isolation of utilities and providing technical advice as needed. The Maintenance Supervisor will be assisted by the Mill Safety Coordinator.

5.5 Laboratory Supervisor

The Laboratory Supervisor has the responsibility to direct and account for all office personnel (including IUSA personnel and office visitors) in evacuation and in activities to cope with the emergency. In case of a mill tour the Supervisor accompanying the tour will be responsible for evacuation of visitors.

5.6 Shift Foremen

Shift Foremen are in charge until the Incident Commander arrives and are responsible for all functions listed above. Shift Foremen have the responsibility to account for all of their people in addition to any visitors, contractors, etc., in their areas and report to the Incident Commander; or, in the absence of the Incident Commander, to administer all of the above duties.

5.7 Scale House Personnel

Scale house person on shift will be responsible to account for ore truck drivers and reagent truck drivers.

5.8 Emergency Response Teams

The response crew for each operating shift will normally consist of the following operators under the direction of the shift foreman. This organization may be changed for individual shifts subject to the approval of the Fire Chief.

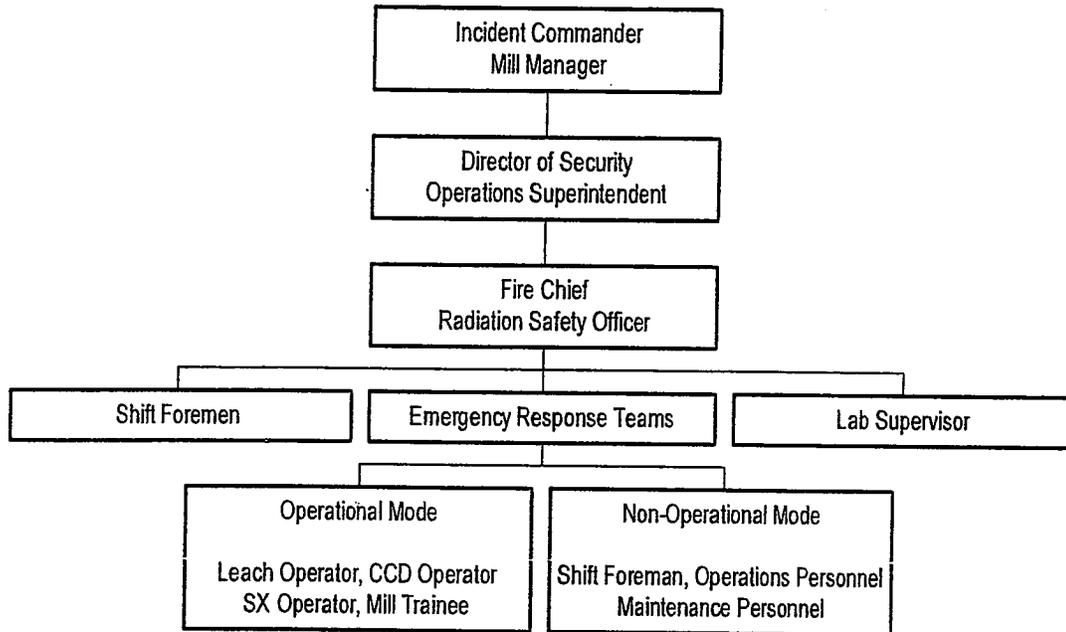
5.8.1 Operational Mode

- Leach Operator
- CCD Operator
- Solvent Extraction Operator
- Mill Trainee

5.8.2 Non-Operational Mode

- Shift Foreman
- Operations Personnel
- Maintenance Personnel

**Figure 2
Emergency Response Organizational Structure**



6. SPECIFIC EMERGENCIES

The following details procedures to be followed during specific emergencies but are not limited to the following.

6.1 Fire

Should a fire occur, the procedure outlined in Appendix A for reporting and responding to fires will be followed. Particular areas of concern include:

- Solvent Extraction Building
- Propane Tanks
- Lab or Lab Storage Area

6.2 Chemical or Gas Release

The procedures for response to a chemical or gas release are outlined as Appendix B.

6.3 Earthquake

Although this is highly unlikely, an earthquake could occur at the Mill. A severe earthquake could cause buildings and other structures to collapse, chemical and/or gas releases, major fires as well as general panic. In the event of a major earthquake the evacuation procedures outlined in Appendix C will be followed.

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6.4 Terrorist/Bomb Threat

In the event that any person should receive a threat of a bomb, the following evacuation procedure should be followed:

- Notify any person of authority, i.e., Superintendent, Foreman, Radiation Safety Officer, who will immediately notify law enforcement authorities and evacuate the threatened area.
- Evacuate all persons from the affected area and stop all radio transmissions.

6.5 Tailings Dam Break and Major Floods

Flood water breaching tailings embankments presents one of the greatest dangers for the sudden release of tailings solids and impounded water. The tailings cells are designed with sufficient freeboard (three feet) to withstand back-to-back 100-year storm events or 40% of the probable maximum flood (PMF) followed by the 100-year storm event. The flood design is equivalent to 15 inches of rainfall. In addition, the tailings dikes were designed in accordance with U.S. NRC regulations and allow a sufficient margin of safety even in the event of an earthquake.

The possibility of floods resulting from Westwater Creek, Cottonwood Creek, and Corral Creek causing a dam failure is extremely remote.

The tailings cells and dikes are inspected on both a daily and shift basis.

Discharges from a dike failure would extend three miles before leaving IUSA's property. In the event of a dam failure, large operating equipment will be mobilized to construct temporary earthen dikes or berms downgradient to the failed dike. In addition, the State of Utah, Department of Radiation Control Executive Secretary (the "Executive Secretary"), MSHA, and State of Utah, Department of Natural Resources, Division of Dam Safety shall be notified.

In the event of a seismic rupture of tailings slurry pipelines, the released slurry will be contained in the tailings cells regardless of the quantity released.

7. EVACUATION PROCEDURE (See Appendix C)

7.1 Notification

Employees will be notified to evacuate the area by dialing 184 on any area telephone and announcing that the Mill should be evacuated. This announcement will be repeated twice. When the paging system cycles through, the evacuation siren (continuous frequency) will automatically sound for approximately forty-five seconds, and then automatically shut off, allowing communications by radio from that point. If the 184 number is dialed accidentally the evacuation alarm may be canceled by disconnecting the phone until the page cycle ends, then re-dial 184. (See Exhibits 1 and 2.)

7.2 Assembly

When the evacuation alarm sounds or when personnel are verbally notified by radio or other means, all personnel will assemble at:

- The parking lot south of the office,

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- The scalehouse,
- North side of Tailings Cell 1, or
- North of the Mill

Assembly site will depend upon conditions, i.e. nature of the emergency, wind conditions, etc. The Fire Chief or Shift Foreman will specify the appropriate assembly site.

7.3 Specific Procedure for Operations Personnel

1. See specific emergency shutdown procedure for Operations by area under the relevant Operating Procedure for your area.
2. All employees not mentioned under Operating Procedures are to immediately report to the assembly area and congregate by crew so that all persons can be accounted for. As employees leave their work areas, they must pass the word to evacuate to any persons who may not be aware of the emergency.
3. After the Mill has been determined to be safe for re-entry, employees will be verbally notified to return to their work stations.

8. Off-Site Emergency Equipment/Personnel Release

Any emergency response equipment or personnel that enter the Restricted Area in response to an incident will be scanned and decontaminated prior to leaving the site according to the procedures included in PBL-9, End Dump Trailer Acceptance, Handling and Release. Any equipment will be decontaminated according to the requirements found in Table 1 of the Nuclear Regulatory Commission's (NRC's) Policy and Guidance Directive FC-85-23, "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of Licenses for Byproduct, Source, or Special Nuclear Material" issued May 1987.

Injured personnel should be evaluated for radiation contamination, if there was a potential for contamination, at the earliest convenience. Should it be necessary, contaminated articles will be gathered by the radiological staff after medical treatment has been rendered. If the personnel cannot be decontaminated, notify the clinic/hospital personnel in advance.

9. EMERGENCY EQUIPMENT

Emergency equipment for the Mill is provided as follows.

9.1 Fire Hose

Fire hose cabinets are located at the following sites with a minimum of 300 feet of 2-1/2" hose, two spanner wrenches, spray nozzles and one hydrant wrench.

- South of SX
- West of CCD
- North of Mill Building
- East of pulp storage tanks
- Northwest of Maintenance Shop
- West of Warehouse

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- East of office building

9.2 Self Contained Breathing Apparatus

Two Self-Contained Breathing Apparatus are located at each of the following locations:

- Hose station east of office building
- Hose Station South of SX
- North End SX Outside Wall
- North end of Mill building, outside wall

9.3 Spill Clean-up Equipment

Barrels of soda ash are located throughout the Mill to be used in case of a chemical spill. Soda ash is also stored in bulk if needed. There are also a few drums of absorbent stored near the laboratory. The laboratory also contains acid spill kits and absorbent materials to be used in case of a spill.

9.4 Fire Fighting PPE

Two complete sets of turnout gear for fire fighting and/or emergency extrication are located in the Fire Hose Station located on the east side of the office building.

9.5 Maintenance of Emergency Equipment

Fire extinguishers are inspected on an annual basis, as well as the fire pump system. The Mill Safety Coordinator performs regular spot checks on the emergency equipment locations to ensure that all of the equipment is in place.

10. EMERGENCY TRANSPORTATION

One fully-equipped First Responder Unit (Ambulance) located west of the office building.

Other motor pool vehicles on the property will be utilized as needed in emergency situations with support as needed from the local Emergency Medical Services.

11. EMERGENCY DRILLS AND TRAINING

Quarterly drills, as required by MSHA, are prepared by the Safety and Radiation Departments to monitor performance of personnel responding to emergency situations. Each drill will be enacted upon one or more of the potential scenarios by this plan. The drill and evacuation activities are documented by the Mill's Safety Coordinator and maintained within plant files. Management will review all drills at quarterly ALARA Committee Meetings.

EXHIBIT 1
EMERGENCY NOTIFICATION LIST

ATTEND TO ANY INJURED PERSONS AND NOTIFY THE SUPERVISOR:

- Give artificial respiration if necessary.
- Control bleeding.
- Treat for shock.
- Immobilize fractures and stabilize for transportation.
- Scan the injured for excessive alpha prior to transporting if time allows.
(If alpha is excessive or there is no time to scan, notify the clinic/hospital personnel and the Radiation Safety Office).

THE SUPERVISOR OR HIS DESIGNEE WILL NOTIFY THE FOLLOWING AS NEEDED:

- Blanding Clinic 678-2254 or 678-3434 (930 N. 400 W.)
- San Juan Hospital, Monticello 678-2830 or 587-2116 (364 W. 1st N.)

EMT and CPR TRAINED – The following personnel should be contacted, if they are on-site, in the event of an emergency to aid in the event of any injuries to personnel.

- David Turk – EMT and CPR trained
- Mike Spillman – CPR trained

AMBULANCE SERVICE

- Blanding Dial 911

If the Company Ambulance is used, an attendant must ride with the injured in addition to the driver, except where the injured could normally be transported in a car or pickup.

OTHER EMERGENCY NUMBERS

- Fire Department Dial 911 or 678-2313
- County Sheriff..... Dial 911 or 587-2237
- Highway Patrol..... Dial 911 or 587-2000
- Blanding Police Dial 911, 678-2916 or 678-2334

MANAGERS

The Supervisor will notify one of the following of all incidents:

- R.E. Bartlett..... 435-678-2495
- D. Turk 435-678-7802 or 435-459-1068
- M. Spillman..... 435-678-2761

A MEMBER OF MANAGEMENT WILL NOTIFY THE PROPER REGULATING AGENCIES AS REQUIRED FOR EACH INCIDENT:

- State of Utah, Department of Radiation Control..... 801-536-4250
- MSHA Field Off.--801-524-3450 Dist. Off. 303-231-5465
- MSHA, Arlington..... 800-746-1553
- State Emergency Response Comm. 801-538-3400
- State of Utah, Natural Resources, Dam Safety 801-538-7200
- National Response Center 800-424-8802
- Utah Poison Control Center 800-456-7707

Notification of surrounding communities and or residences will be handled by the appropriate agencies as required by EPCRA (Emergency Planning and Community Right to Know Act).

EXHIBIT 2
INTERNAL NOTIFICATIONS

Internal reporting requirements for Incidents, Spills and Significant Events are as follows:

Report Immediately:

Event Criteria:

- Release of toxic or hazardous substances.
- Fire, explosions or other accidents.
- Government investigations information, requests or enforcement actions.
- Private actions or claims (corporations or employees).
- Deviations from Corporate policies or government requirements by Management.

Other significant events, which have resulted or could result in:

- Death, serious injury or adverse health effect (employees or public).
- Property damage exceeding \$1,000,000.
- Government investigation or enforcement action – limiting operation or penalties of \$100,000 or more.
- Significant criminal actions.
- Substantial media coverage.
- Unscheduled down time of more than 24 hours.

Report at the Beginning of the Next Business Day:

Incident Criteria:

- Was reported to a government agency as required by law.
- Worker (IUSA or contractor) recordable injury or illness associated with a release.
- Community impact - reported or awareness.
- Publicity resulted or is anticipated.
- Release of process material, waste or product in excess of the Reportable Quantities listed in Section 1.5 of the Spill Prevention, Control, and Countermeasures Plan.

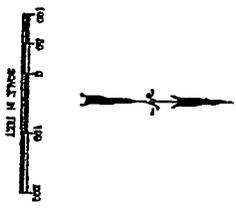
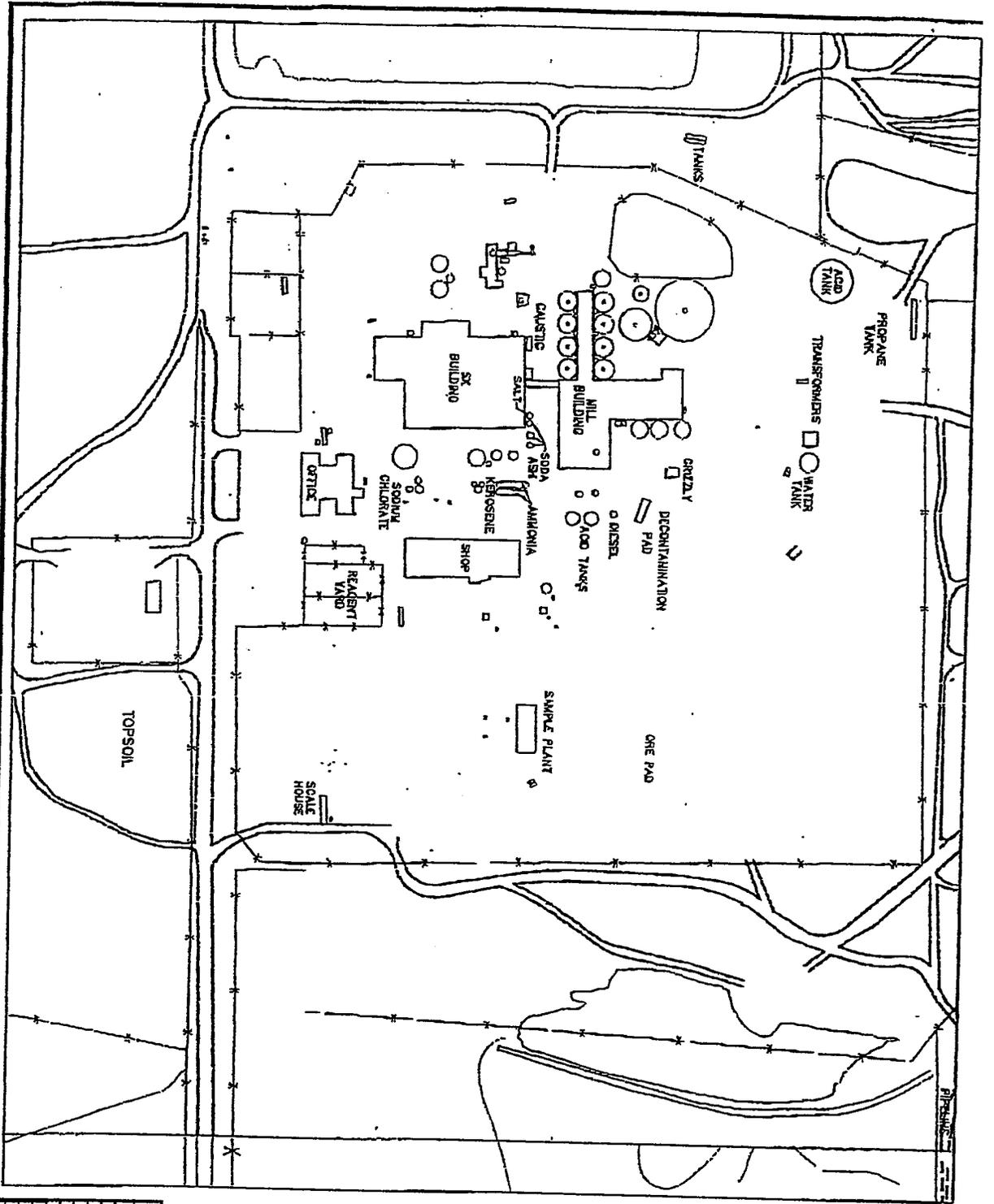
The local manager in charge is to call Ron Hochstein or Dave Frydenlund.

Name Title Office Phone Home Phone

Ron Hochstein (President and COO)	303-628-7798 (office)
		604-931-6334 (home)
		604-377-1167 (cell)
David Frydenlund (V.P. and General Counsel)	303-389-4130 (office)
		303-221-0098 (home)
		303-808-6648 (cell)

EXHIBIT 3

SITE LAYOUT MAP



International Uranium (USA) Corporation	
WHITE MESA MILL	
Project	White Mesa Mill
Location	Utah
Date	12/14/04
Drawn by	W. J. ...
Checked by	...
Scale	As Shown
Author	...
Revised	...
Printed by	Standard

MILL SITE LAYOUT

EXHIBIT 4

MAIN SHUT-OFF VALVES

During an emergency this list should be used along with Site Layout Map (Exhibit 3) to locate tanks and valves associated with these tanks.

REAGENT SHUT-OFF VALVE LOCATIONS

Sulfuric Acid

4" Main located south side of acid tank

East acid pump discharge valve

West acid pump discharge valve

3" Main (leach area) located 25 feet west of Derrick screens next to walkway

1-1/2" Main (SX area) located south of Central Control room

Ammonia

4" Main (east tank) located on end at bottom

4" Main (west tank) located on end at bottom

2" Valve located on top of tank (east tank)

2" Valve located on top of tank (west tank)

Kerosene

2" Main valve located at bottom of tank (east tank)

2" Main valve located at bottom of tank (north tank)

2" Main valve located at bottom of tank (south tank)

Pump discharge 2" valve

Soda Ash

Main valve located at bottom of tank (dry storage)

4" Main valve located at bottom of tank on 30% dilution tank

4" Main valve located at bottom of tank on dilution tank

Salt

3" Main valve located at bottom of tank

Caustic Soda

3" Main valve located at bottom of tank east and west between supports

EXHIBIT 4

MAIN SHUT-OFF VALVES

Sodium Chlorate

3" Main valve located at bottom of tank (east tank)

3" Main valve located at bottom of tank (north tank)

3" Main valve located at bottom of tank (south tank)

Propane

4" Main located 15 feet east of tank

3" Main located on pipe off top of tank

3" Main located at bottom of tank (also fill pipe)

PLANT UTILITY SHUT-OFF VALVE LOCATIONS

Process Water

Main valve located on west side of water storage tank

Discharge valve off service water pump east

Discharge valve off service water pump west

Mill process water main located east wall by SAG mill

Fire Water

Main valve located west side of water storage tank

Emergency fire pump discharge valve to fire system

Emergency fire pump discharge valve to header west side of pump house

8" Main valve located south of Central Control room for SX and boilers

Potable Water

2" Main (suction) from potable water storage tank

2" Main (discharge) from potable water storage tank

4" Main located at east wall by SAG mill

4" Main located south of Central Control room for SX, Maintenance shop, and offices

Steam

Main discharge valve for Superior boiler located at top of boiler

Main steam valve located south side of boiler house

EXHIBIT 4

MAIN SHUT-OFF VALVES

Plant Air

Main valve located at receiver tank in compressor room at boiler house

Main valve to mill building located south of Central Control room

PROCESS SHUT-OFF VALVE LOCATIONS

Pulp Storage

No. 1 valve located on west side of tank

No. 3 valve located on west side of tank

Preleach (old No. 2 pulp storage) valve located on west side of tank

Preleach Thickener

Main valve located underneath at center cone

Clarifier

Main valve located underneath at center cone

Main valve located underneath at center cone

CCD Thickeners

Main valve located underneath at center cone of each thickener

APPENDIX A

EMERGENCY PROCEDURE RESPONSE TO FIRE

1. The fire will be reported by dialing 185 on any telephone in the area and announcing the location of the fire over the paging system. This announcement will be repeated twice, for a total of three announcements. When the paging system cycles through, the fire siren (alternating frequency) will automatically sound for approximately forty-five seconds then automatically shut off, allowing radio communications to resume.
2. Mobilize the fire crew.
3. Evacuate all personnel.
4. Rescue any victims of the fire; do this only with properly trained and equipped personnel.
5. Isolate utility lines affected by the fire.
6. Extinguish the fire and post a fire watch for flare-ups.
7. Report the fire to proper local, State, Corporate and Federal agencies.
8. In cases where the fire is not extinguished within thirty minutes of discovery, the area must be barricaded off after extinguishing and left undisturbed until released by MSHA and IUSA management.
9. Emergency off-site centers - Blanding Fire House and Sheriff's office:

Blanding Fire
350 West 200 South, Blanding
Phone number is 911

Sheriff's Office
50 West 100 South, Blanding
Phone number is 911 or (435) 587-2237

APPENDIX B

EMERGENCY PROCEDURE RESPONSE TO CHEMICAL OR GAS RELEASE

A chemical or gas release would most likely occur very suddenly. The person who would first witness a chemical or gas release should immediately contact his supervisor who would initiate the procedures outlined below:

1. Activate evacuation alarm by using the "dial 184" notification system. Evacuate and account for all personnel.
2. Mobilize trained personnel and emergency equipment such as SCBA's, first aid equipment, etc.
3. Initiate rescue operations for any people who may be trapped by the release.
4. Provide first aid and emergency medical care for any ill or injured persons.
5. Initiate necessary steps to contain and/or neutralize the release, such as spraying with water fog, turning off valves, etc.
6. Guard against possible fires by shutting off electrical circuits, isolating gas lines and eliminating ignition sources from the affected area.

APPENDIX C

EMERGENCY EVACUATION PROCEDURE

1. Activate evacuation alarm by using the "dial 184" notification system. Evacuate and account for all personnel.
2. Personnel are to assemble in one of the following areas:
 - The parking lot south of the office building
 - The scalehouse
 - The north side of Tailings Cell 1, or
 - North of the Mill
3. Mobilize trained personnel and emergency equipment such as SCBA's, first aid equipment, etc.
4. Initiate rescue operations for any people who may be trapped.
5. Provide first aid and emergency medical care for any ill or injured persons.
6. Guard against possible fires by shutting off electrical circuits, isolating gas lines and eliminating ignition sources from the affected area.

FIGURE 1
FIRE SYSTEM SCHEMATIC DRAWING

