



State of Utah

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Department of
Environmental Quality

Alan Matheson
Executive Director

DIVISION OF WASTE MANAGEMENT
AND RADIATION CONTROL
Scott T. Anderson
Director

December 2, 2015

Norman Schwab, Vice President of Mining
Uranium One Americas, Inc.
907 North Poplar, Ste. 260
Casper, WY 82601

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7003 2260 0003 2353 8075

Joshua Bleak, President
Anfield Resources Holding Corporation
3346 West Guadalupe Road
Apache Junction, AZ 85120

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7003 2260 0003 2353 8082

RE: Request to Extend Radioactive Material License (RML) Number UT 0900480

Dear Mr. Schwab and Mr. Bleak:

On November 17, 2015, Uranium One Americas, Inc. (Uranium One) and Anfield Resources Holding Corp. (Anfield) requested an extension of the expiration date of the Shootaring Canyon Uranium Mill's RML of six months. Uranium One and Anfield's basis for the request was that the sale transaction and RML transfer of the mill took longer than expected. The November 17, 2015 letter also explained that the Mill is still being staffed and the request for extension won't cause any additional public health and environmental concerns.

The current expiration date for the RML is April 30, 2014. On March 28, 2014, Uranium One submitted a request to extend the expiration date of the RML by six months. This request was approved by the DRC on April 15, 2014 with a new expiration date of October 31, 2014. Since that time, there have been no other requests to extend the license expiration. Therefore, the RML for the Shootaring Canyon Mill is expired.

However, R313-22-36(3) of the Utah Administrative Code states that "A specific license continues in effect, beyond the expiration date if necessary, with respect to possession of radioactive material until the Director notifies the licensee in writing that the license is terminated. During this time, the licensee shall:

(Over)

DRC-2015-008531

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- (a) limit actions involving radioactive material to those related to decommissioning; and
- (b) continue to control entry to restricted areas until they are suitable for release so that there is not an undue hazard to public health and safety or the environment.”

After reviewing the request, the Division of Waste Management and Radiation Control (DWMRC) has determined the following:

- 1) The Shootaring Canyon Uranium Mill’s RML is expired but it is not terminated.
- 2) The new owner (Anfield) will need time to prepare and submit a renewal application.

The Director of the DWMRC has determined that:

- 1) Anfield will have until the close of business June 30, 2016 to submit a renewal application.
- 2) Failure to submit a RML renewal application by June 30, 2016 may result in the issuance of an Order requiring the Mill to be decommissioned to unrestricted release in accordance with 10 CFR 40 Appendix A Criterion 2, as incorporated by reference in R313-24-4 of the Utah Administrative Code. The justification of this order is as follows: (1) the licensee has been granted three renewal extensions; (2) the mill has been in standby status since 1982; (3) the licensee has not actively pursued operational status of the mill since becoming the owner back in 2007; and (4) upgrading the mill to operational status to Best Available Technology standards would require substantial investment.

If you have any questions, please call Ryan Johnson at (801) 536-4255 or Phil Goble at (801) 536-4044.

Sincerely,



Scott T. Anderson, Director
Division of Waste Management and Radiation Control

STA/RMJ/ka

- c: David Blodgett, M.D., Health Officer, Southwest Utah Public Health Dept.
Robert Beers, MBA, EHS, Environmental Health Director, Southwest Utah Public Health Dept.
Paul Wright, P.E., DEQ District Engineer