

5. Based on testing and analysis, Molycorp has concluded that the proximity of the water line to the temporary and other storage sites would cause no detrimental health or environmental impact.

6. Both the Township and the City have suggested that information regarding Molycorp's Washington and York decommissioning activities has not been made available by Molycorp to the Township and the City. Again, this assertion is untrue.

7. In early 1997, Molycorp created a Public Document Room at its offices in Canton Township in which it made available to the public (including representatives of the Township and City) documents regarding Molycorp's decommissioning plans as the documents became available. Those documents available to the Township and the City regarding Molycorp's York decommissioning plan and Molycorp's temporary storage proposal include:

- York Decommissioning Plan (6/99) (Revision 1);
- York Site Characterization Report (Volumes I and II);
- Final Design Report Temporary Storage; and
- Report regarding Hydrology in Temporary Storage Area (4/96).

8. In the Public Document Room, Molycorp also provided copies of documents pertaining to the decommissioning of the Canton Township site, including the following:

- Washington Decommissioning Plan;
- Washington Decommissioning Plan (Rev. 1, Part 1);
- Washington Site Characterization Report (Volumes I, II and III);
- Washington Facility Environmental Report (Volumes I and II);
- Oak Ridge Associated University Washington Site Survey;
- Report of Review of Decommissioning Plan for the Molycorp Washington County, Pennsylvania Site and Discussion of Associated Health Impacts on the Community;
- Report on Evaluation of Potential Health Risks of Human Exposure to Radiation from Thorium-Bearing Slag Associated with the Molycorp Washington, Pennsylvania Site; and
- Findlay Site Cleanup Final Report.

9. In addition to making these documents available for public inspection, several years ago Molycorp also mailed copies of certain of the documents filed in the Public Document Room directly to the Canton Township Board of Supervisors, including all three volumes of the Washington Site Characterization Report and the Washington Decommissioning Plan.

Further affiant sayeth not.

George W. Davis

Sworn and subscribed before me
this 29 day of November, 1999.

Laura Wallace
Notary Public

My commission expires: 6-25-01

Notarial Seal
Laura Wallace, Notary Public
Washington, Washington County
My Commission Expires June 25, 2001

0019782

Member, Pennsylvania Association of Notaries

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Of Counsel
Robert W. Mandell

October 11, 1999

Randolph T. Struk, Esquire
THORP, REED & ARMSTRONG, LLP
One Riverfront Center
Pittsburgh, PA 15222

In Re: Molycorp, Inc. - Canton Township

Dear Mr. Struk:

I propose that we and our respective clients' representatives meet at some time next Tuesday - Thursday (October 19-21, 1999). If agreeable to you, we are willing to meet at the Molycorp facility or at the Canton Township Municipal Building.

I was surprised to discover that the Township has not yet received certain basic information and documents relevant to these Molycorp matters. To be adequately prepared for next week's meeting and future meetings, we hereby request on behalf of Canton Township a copy of the following documents:

1. Source Materials License No. SMB-1393.
2. Site Decommissioning Plan for Molycorp's Washington facility (original and any amendments or revisions thereto).
3. Decommissioning Plan for Molycorp's York facility (original and any amendments or revisions thereto).
4. License Amendment Request and related reports.
5. Environmental Impact Studies issued pursuant to all Decommissioning Plans and the License Amendment Request.
6. All correspondence to and from the NRC relating to all Decommissioning Plans and the License Amendment Request.

OCT 12 1999

Randolph T. Struk, Esquire
October 11, 1999

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7. The Molycorp plant map (Washington facility) referred to at the September 29 NRC meeting.

These documents should be forwarded to my attention at our office. Please advise if you anticipate any delay in forwarding such documents. I will await your suggestions as to possible meeting dates and times next week.

Sincerely yours,



SAMUEL R. GREGO

SRG:smm

cc: Chad Smith
John T. Olshock, Esquire



ATTORNEYS AT LAW SINCE 1895

VIA FACSIMILE

Samuel R. Grego, Esq.
Goldberg, Kamin & Garvin
1806 Frick Building
437 Grant Street
Pittsburgh, PA 15219-6101

November 5, 1999

Re: Molycorp, Inc., Canton Township and City of Washington

Dear Sam:

I am writing as a follow-up to our telephone conversation today regarding a meeting between Molycorp representatives and representatives of both Canton Township and the City of Washington, pursuant to Judge Bloch's Memorandum Order. This will confirm that this meeting will take place on Tuesday, November 9, 1999, beginning at 1:00 p.m. Unless I notify you otherwise, this meeting will be held in Molycorp's offices on Caldwell Avenue.

As I indicated to you, I have been unable to reach Jeff Watson. However, I understand that to the extent that he has any conflicts on November 9, these conflicts are in the morning. Accordingly, by scheduling our meeting for 1:00 p.m., hopefully we can avoid any conflicts in Mr. Watson's schedule and he will be able to attend, along with any appropriate representatives of the City of Washington. However, even in the event that Mr. Watson cannot clear his calendar, I nonetheless believe we should go forward with the meeting in light of the recent order received from Judge Bechhoeffer.

I would also like to confirm our conversation regarding the documents you have requested in your letter to me of November 1, 1999. In your letter, you indicated that you would like to receive copies of the following documents identified in my previous letter to you of October 25, 1999:

Pittsburgh

Philadelphia

Wheeling

Thorpe Reed & Armstrong, LLP
One Riverfront Center
20 Stanwix Street
Pittsburgh, PA 15222-4895
412 394 7711
412 394 2555 Fax

- Washington Decommissioning Plan
- Washington Decommissioning Plan, Rev. 1 part 1
- Washington Facility Environmental Report, Volumes 1 & 2
- Oak Ridge Associated University Washington Site Survey
- Findlay Site Cleanup Final Report
- Final Design Report Temporary Storage
- Report Regarding Hydrology and Temporary Storage Area
- York Decommissioning Plan (6/99) (Revision 1)
- York Site Characterization Report, Vols. 1 & 2

Samuel R. Grego, Esq.
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November 5, 1999

As I advised you, given the nature of these materials, and the fact that they contain numerous fold-out maps, it is not possible to have copies made and provided to you in advance of our meeting on the 9th. However, I offered you the opportunity to visit the Public Document Room at Molycorp's Washington facility to review these documents in advance of our meeting. You have declined this offer, and have indicated that you would like us to proceed with making copies for you. I will get this process going, and will provide you with copies of the above identified documents as soon as reasonably practicable.

Your November 1 letter also identifies other additional documents which were not directly addressed in my previous letter to you. In our conversation today, I indicated to you that to the extent that you have appropriately identified Source Materials License No. SB-1393, I will provide a copy of this license to you. Moreover, you indicated that your request for "License Amendment Request and Related Reports" was intended to describe the submission Molycorp made to the NRC with respect to the proposal to temporarily store York decommissioning materials at Molycorp's Washington County facility. I confirmed that I would provide you with this license amendment request submitted to the NRC.

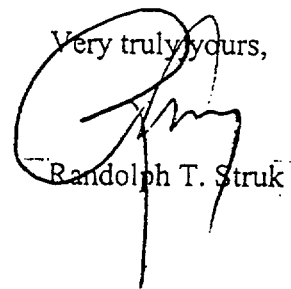
You have also requested a copy of a map purportedly referred to during the course of the September 29, 1999 meeting with the NRC. I indicated that I did not have any specific information as to the particular map to which you are generally referring. However, if you can provide me with additional information which specifically identifies the map you are requesting, I will promptly respond. Moreover, I will check with George Dawes to see whether he can identify the map to which you are referring. Finally, you have agreed to withdraw your request for correspondence between Molycorp and the NRC.

Samuel R. Grego, Esq.
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November 5, 1999

If you have any questions, please call me. I look forward to meeting with you on November 9.

Very truly yours,



Handwritten signature of Randolph T. Struk, consisting of a large, stylized 'R' followed by 'T. Struk'.

Randolph T. Struk

RTS/cag
cc: Jeffrey Watson, Esq.