



INTERNATIONAL
URANIUM (USA)
CORPORATION

Independence Plaza, Suite 950 • 1050 Seventeenth Street • Denver, CO 80265 • 303 628 7798 (main) • 303 389 4125 (fax)

October 24, 2000

VIA FACSIMILE AND FIRST CLASS MAIL

Mr. Dennis R. Downs, Executive Secretary
State of Utah Department of Environmental Quality
Utah Solid and Hazardous Waste Control Board
288 North 1460 West
P.O. Box 144880
Salt Lake City, UT 84114-4880

Reference: Completion of Response
February 25, 2000 Order for Compliance No. 0002007

Dear Mr. Downs:

The purpose of this letter is to advise the Utah Division of Solid and Hazardous Waste ("Utah DSHW") that International Uranium (USA) Corporation ("IUSA") has completed its response to the subject Order for Compliance ("Order"). The Order required, by May 31, 2000, the complete removal and off-site disposal of approximately 21 tons of material characterized as hazardous waste (based upon lead content) which had been improperly shipped from the Boston Artery Tunnel Project ("Boston Material") to the White Mesa Uranium Mill (the "Mill"). In response to IUSA's several requests for extensions, Utah DSHW extended the removal date to October 2, 2000. The Order further required, among other things, that following such removal notice be sent to the Executive Secretary as to (1) the name of the facility where the material was sent and (2) the total amount shipped; together with a copy of the manifest.

As you know, the Boston Material was inadvertently delivered to the Mill and placed onto an ore pile at the Mill that contained 480 cubic yards of material from the Ashland 1 FUSRAP Site, and which had been shipped to the Mill as uranium-bearing alternate feed material to be processed for uranium under the terms of the Mill's NRC License. In response to the Order, and as described in the report entitled "Completion of Ore Lot #78 Material Segregation at the White Mesa Mill" (IUSA, August 7, 2000), a copy of which has been provided to you, the Boston Material was successfully segregated from the Ashland material in accordance with the Segregation Plan submitted to the Utah DSHW and the NRC on May 22, 2000. The segregation resulted in the Boston Material being placed in a container for shipment off-site.

template
06C002

ERIDS-06C01

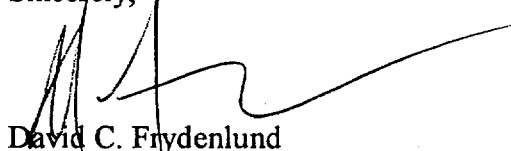
In accordance with the Order, IUSA hereby advises the Utah DSHW of the following:

1. On October 2, 2000, the package containing the Boston Material was removed from the Mill site by Diamond S Trucking, Inc., under contract to MHF-Logistical Solutions, for delivery to the disposal facility, Waste Control Specialists ("WCS"). The WCS facility is located in Andrews, Texas.
2. The total weight of the Boston Material shipped to WCS was approximately 21.6 tons.
3. The package containing the Boston Material was acknowledged received by WCS on October 9, 2000. IUSA was advised by WCS that it normally takes thirty days to transmit the signed manifest acknowledging receipt to the generator; however, in response to our request that WCS expedite transmittal of the signed manifest so that the manifest could be transmitted to the Utah DSHW, IUSA received the attached copy of the fully executed manifest on October 23, 2000.

This transmittal is meant to complete compliance with all items in Order for Compliance No. 0002007. In accordance with letters dated June 2, 2000 and July 7, 2000 from yourself, on behalf of the Utah DSHW, and Philip Ting of the NRC, respectively, the remainder of Ore Lot #78 is now regulated by the U.S. NRC and may be processed at the Mill by IUSA.

IUSA appreciates Utah DSHW's input and comment during development of the approach to segregating and removing the Boston Material to an approved disposal facility. Should you require any further information, please contact me at 303.389.4130.

Sincerely,



David C. Frydenlund
Vice President and General Counsel

Attachment

cc/att: Fred G. Nelson, Utah Assistant Attorney General
William J. Sinclair, Utah DEQ
Don Verbica, Utah DSHW
Linda Jacobson, U.S. EPA – Region VIII
Milt Lammering, U.S. EPA – Region VIII
William von Till, U.S. NRC
Dwight Chamberlain, U.S. NRC Region IV
Maria Schwartz, U.S. NRC Office of the General Counsel
Bruce Howard, IT Corporation

John Franz, IT Corporation
Derek Rhodes, IT Corporation
Mark Schwippert, IT Corporation
Rick Zink, MHF-Logistical Solutions
H. Michael Keller, CSX
Ronald E. Berg
William N. Deal
Ron F. Hochstein
Michelle R. Rehmann

TEXAS NATURAL RESOURCE
CONSERVATION COMMISSION

P.O. Box 13087
Austin, Texas 78711-3087

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)



OCT 23 1995

10-16-00 ll
Date Returned Initial

MW15571

Form approved. OMB No. 2050-0039, expires 09/30/95

| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator's US EPA ID No. U.T.P. 0 0 0 0 0 1 0 2 1 | | Manifest Document No. 0 0 0 0 1 | | 2. Page 1 of 1 | | Information in the shaded areas is not required by Federal law. | | | | | |
|--|--|--|--|---|--|---|--|--|--|----------------------------|--|---|--|
| 3. Generator's Name and Mailing Address IUC White Mesa LLC 6425 So. Highway 191 Blanding, UT 84511 | | | | | | A. State Manifest Document Number 00887274 | | | | | | | |
| 4. Generator's Phone (435) 678-2221 William N. Deal, Mill Manager | | | | | | B. State Generator's ID 999193 | | | | | | | |
| 5. Transporter 1 Company Name Diamond S Trucking, Inc. | | | | 6. US EPA ID Number AZ 0 0 0 0 3 3 7 6 9 1 | | C. State Transporter's ID 85144 | | | | | | | |
| 7. Transporter 2 Company Name | | | | 8. US EPA ID Number | | D. Transporter's Phone 800-645-7009 | | | | | | | |
| 9. Designated Facility Name and Site Address Waste Control Specialists, LLC 9998 W. Hwy 176 Andrews, TX 79714 | | | | | | E. State Transporter's ID | | | | | | | |
| 10. US EPA ID Number TX D 9 8 8 0 8 8 4 6 4 | | | | | | F. Transporter's Phone | | | | | | | |
| 11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) a. RQ, Hazardous Waste Solid, N.O.S., (Lead), 9 NA 3077, III (D008) | | | | | | 12. Containers No. Type | | 13. Total Quantity | | 14. Unit Wt/Vol | | 15. Waste No. TX-OUTS 302-H D008 | |
| b. | | | | | | | | | | | | | |
| c. | | | | | | | | | | | | | |
| d. | | | | | | | | | | | | | |
| J. Additional Descriptions for Materials Listed Above UOP 13661 | | | | | | K. Handling Codes for Wastes Listed Above M132 | | | | | | | |
| 15. Special Handling Instructions and Additional Information Emergency Contact: ERG#: 171 Emergency Phone: Container #: MHFU111505 | | | | | | | | | | | | | |
| 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. | | | | | | | | | | | | | |
| Printed/Typed Name David C. Frydenlund, VP | | | | | | Signature <i>[Signature]</i> | | | | Month Day Year 00 28 00 | | | |
| 17. Transporter 1 Acknowledgement of Receipt of Materials | | | | | | Date | | | | | | | |
| Printed/Typed Name Dennis Cosby | | | | | | Signature <i>[Signature]</i> | | | | Month Day Year 10 2 00 | | | |
| 18. Transporter 2 Acknowledgement of Receipt of Materials | | | | | | Date | | | | | | | |
| Printed/Typed Name | | | | | | Signature | | | | Month Day Year | | | |
| 19. Discrepancy Indication Space | | | | | | | | | | | | | |
| 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. | | | | | | | | | | | | | |
| Printed/Typed Name Richard F. Casillas | | | | | | Signature <i>[Signature]</i> | | | | Month Day Year 10 09 00 | | | |