

Request to Amend
Source Material License SUA-1358
White Mesa Mill
Docket No. 40-8681

September 20, 1996

Prepared by:
Energy Fuels Nuclear, Inc.
1515 Arapahoe Street, Suite 900
Denver, CO 80202

Contact: Michelle R. Rehmann, Environmental Manager
Phone: (303) 899-5647

Submitted to:

United States Nuclear Regulatory Commission
2 White Flint North, Mail Stop T-7J9
11545 Rockville Pike
Rockville, MD 20852

INTRODUCTION

Energy Fuels Nuclear, Inc. ("EFN") operates an NRC-licensed uranium mill located approximately six miles south of Blanding, Utah. The mill processes natural (native, raw) uranium ores and feed materials other than natural ores. These alternate feed materials are generally processing products from other extraction procedures, which EFN will process primarily for the source material content. All waste associated with this processing is, therefore, 11e.(2) byproduct material; or, as stated in the alternate feed analysis noticed in Federal Register Volume 57, No. 93:

"The fact that the term 'any ore' rather than 'unrefined and unprocessed ore' is used in the definition of 11e.(2) byproduct material implies that a broader range of feed materials could be processed in a mill, with the wastes still being considered as 11e.(2) byproduct material".

This application to amend NRC Source Material License SUA-1358 requests an amendment to allow EFN to process a specific alternate feed primarily for its source material content, and to dispose of the associated 11e.(2) byproduct material.

1.0 MATERIAL COMPOSITION AND VOLUME

Allied Signal, Inc. of Metropolis, Illinois, ("Allied") will repackage (as necessary), prepare, and load for shipping material described as uranium-bearing potassium diurate ($K_2U_2O_7$) in a solution of potassium hydroxide/potassium fluoride ("KOH/KF") in water ("Material"). This Material is currently contained in approximately 11,000 drums. Approximately 110 loads, or 4,000 to 5,000 of 55-gallon drums (900 tons), of dry material will be shipped in drums, and approximately 98 loads will be shipped in slurry form (in tanker trucks) to the White Mesa Mill ("the Mill"). Specific gravity of the slurry is approximately 1.5 to 1.6. Approximately 5,000 cu. ft. of compacted drums, resulting from the repackaging of the Material, having been washed, pelletized, and wrapped, will also be sent to the Mill. It has been standard practice to dispose of drums in which alternate feed material is contained as 11e.(2) byproduct material as they are emptied for processing of the Material; however, in this case, environmental and waste minimization considerations demand that some of the Material be emptied from drums and shipped in tankers as slurry. The drums, however, remain an element of this recycling process. Further, as discussed below in subsection 1.3, these drums are considered to have become 11e.(2) byproduct when U_3O_8 (yellowcake) was placed in the drums for shipment to Allied.

1.1 Radiochemical Analysis

Attachment 1 is an analytical report for uranium isotopes. Analysis by the on-site laboratory at EFN White Mesa Mill indicates a uranium content of seven to ten percent. This high uranium content justifies recycling this material to extract uranium.

1.2 Analysis for Hazardous Constituents

NRC guidance suggests that if a proposed feed material consists of hazardous waste, listed under subpart D §§261.30-33 of 40 CFR (or comparable RCRA authorized State regulations), it would be subject to EPA (or State) regulation under RCRA. To avoid the complexities of NRC/EPA dual regulation, such feed material may not be approved for processing at a licensed mill. If the licensee can show that the proposed feed material does not consist of a listed hazardous waste, this issue is resolved. NRC guidance further states that feed material exhibiting only a characteristic of hazardous waste (ignitable, corrosive, reactive, toxic) would not be regulated as hazardous waste and could therefore be approved for recycling and extraction of source material.

Attachment 2 lists analytical results based on EPA method 8260 analysis for organics. No parameters from the method 8260 list were detected.

1.3 Regulatory Considerations

Waste Disposal

The Atomic Energy Act of 1954, 42 U.S.C. 2014(e)(2), defines "byproduct material" as (1) any radioactive material (except special nuclear material) yielded in or made radioactive by exposure to the process of producing or utilizing special nuclear material; and (2) the tailings or wastes produced by the extraction or concentration of uranium or thorium from any ore processed primarily for its source material content. For purposes of uranium processing, byproduct material means the tailings or wastes produced by the extraction or concentration of uranium or thorium from any ore processed primarily for its source material content (10 CFR 20).

Under License Condition 55, License SUA-1358 authorizes EFN to accept for disposal up to 5,000 cubic yards of byproduct material from any single source, for disposal in Cell No. 3. Additionally, as alternate feed from Allied is currently processed by EFN under License Condition 56, drums in which the feed material is shipped are disposed of in tailings Cell No. 2. The drums containing the material are disposed of as byproduct material.

According to NRC guidance, for the tailings and wastes from the proposed processing to qualify as 11e.(2) byproduct material, the feed material must qualify as "ore." NRC has stated alternate feed material is determined to be ore, by following definition:

"Ore is a natural or native matter that may be mined and treated for the extraction of any of its constituents or any other matter from which source material is extracted in a licensed uranium or thorium mill". Processing of this ore then, results in byproduct material.

The drums sent to Allied, which contained yellowcake, result from the production of source material, and as such, are byproduct material. The drums are also used in the recycling process for containing and/or shipping alternate feed materials, which are processed for extraction of source material. As part of the process, the drums would also be disposed of as 11e.(2) byproduct material.

With regard to this request to amend, due to aging of some drums and moisture content of the material, a certain percentage of the drums are not considered sufficiently competent to contain the Material for shipment. Rather than produce additional waste by overpacking these drums prior to shipment, Allied will empty the contents of these drums into tanker trucks for shipment. As the drums are still byproduct material, they will be washed, compacted, and shipped along with the Material, as part of the recycling process, for disposition at the Mill. Attachment 3 is a statement from Allied confirming that the proposed approach is reasonable in terms of being a cost-effective, waste-minimizing, and environmentally-protective option.

In Section 4.0, below, EFN certifies that the feed material is to be processed primarily for the recovery of uranium and for no other primary purpose. EFN justifies the certifications on the basis of the high uranium content of the feed material.

Classification as Alternate Feed

The Material, as alternate feed to a licensed uranium mill, is not subject to regulation as a hazardous waste as defined in the Resource Conservation and Recovery Act, as amended, 42 U.S.C. §6901-6991 and its implementing regulations, or comparable Utah and Illinois laws or regulations governing the regulation of hazardous wastes. The Material has not been transported from any site or facility which (1) is or has been the subject of response costs or demands for payment of response costs as defined in the Comprehensive Environmental responses, Compensation, and Liability Act, as amended, 42 U.S.C. §9601-9657 ("CERCLA"), or (2) is listed, or is proposed to be listed, on the National Priority List as defined in CERCLA.

2.0 PROCESS

The slurry material will be off-loaded into No. 2 Pulp Storage Tank. The drummed material will either be dumped into a small batch tank and pumped into No. 2 Pulp Storage Tank (as the calcium fluoride was processed) or will be processed through the ore hopper and SAG mill before being pumped to No. 2 Pulp Storage.

pH adjustment will begin in Pulp Storage Tank No. 2 with the addition of sulfuric acid. After the initial pH adjustment, the slurry will be pumped to the leach circuit, where it will be mixed with tailings solution, for the final pH adjustment. The solution will then be transferred to the CCD circuit for washing.

Depending on the grade of the solution, it will either be pumped into a holding tank (if the grade is high enough), and then fed to the precipitation and drying circuit. If, after the CCD circuit the solution grade is low, the remainder of the recovery process will be unchanged from the current mill process.

3.0 SAFETY MEASURES

This section describes how the Material will be introduced into the mill circuit, and the safety measures to be employed.

The Material received in bulk transport will be a slurry which is pumped from the tanker truck directly into a receiver mix transfer tank. The density of the pulp will be adjusted, then the slurry will be introduced into the leach circuit as is typical with uranium ore. Material transported in drums will be either dumped into the mix transfer tank, or processed through the grizzly into the SAG mill, then pumped to the leach circuit. In either case, there are no process changes to the mill circuit and the extraction process sequence is identical to processing conventional uranium ore.

Employee exposure potential during initial material handling operations is expected to be no more significant than what is normally encountered during conventional milling operations. Employees will be provided with personal protective equipment including full-face respiratory protective devices. Airborne particulate samples will be collected and analyzed for gross alpha concentrations, as well as potassium hydroxide, potassium fluoride ("KOH/KF") dust concentrations. If Threshold Limiting Values (TLV's) for KOH/KF dust concentrations of 2 mg/m³ are exceeded, or if uranium airborne concentrations exceed 25 percent of DAC, full-face respiratory protection will be implemented during the entire sequence of material dumping operations. Spills and splashed material that may be encountered during this initial material processing shall be wetted and collected during routine work activity.

Sample material of the KOH/KF solids indicates it is a neutral solid, with a measured pH of 6.9; nevertheless, coveralls and rubber gloves will be worn at all times when handling this material.

3.1 Control of Airborne Contamination

EFN does not anticipate unusual or extraordinary airborne contamination dispersion when processing this Material. The contamination potential is expected to be less than what is normally encountered when processing conventional uranium ore. The Material will be contained in 55-gallon drums or received in bulk via tanker truck.

If the Material is received in bulk by tanker truck, it will be slurried and pumped directly into a transfer tank and immediately introduced into the leach circuit. The successive extraction process circuitry from CCD through solvent extraction and into precipitation are all liquid processes, and the potential for airborne contamination dispersion is minimal.

If the Material is received in 55-gallon drums, each drum will be dumped onto the ore loading belt and processed through the SAG mill and introduced into the leach circuit.

Uranium extraction proceeds through the mill circuit as if the process Material were uranium ore. As the Material is dumped onto the ore transfer belt, water is sprayed into the grizzly enclosure, which minimizes dust dispersion. As the Material is transferred through the ore transfer tunnel into the SAG mill, a water spray system along the length of the transfer belt is activated. If it becomes more practicable to dump individual 55-gallon drums into the mix transfer tank as in bulk processing, a water spray system on top of the mix tank will be activated. The Material is a moist cake as received (moisture content > 5 percent). Nevertheless, water spray provisions are provided when handling individual drums or bulk material processing.

The efficiency of airborne contamination control measures during the Material handling operations will be assessed in the immediate vicinity of the mix tank and next to the grizzly enclosure. Airborne particulate samples and breathing zone samples will be collected in those areas during initial material processing activities and analyzed for gross alpha, as well as for KOH/KF dust concentrations. The results will establish health and safety guidelines which will be implemented throughout the material processing operations.

Personal protective equipment, including respiratory protection, will be provided to those individuals engaged in material processing. Additional environmental air sample adequate contamination control measures are effective.

Based upon previous experience, it is anticipated that adequate engineering control measure and established personal protective equipment use, which have been and will be implemented during material handling and processing operations, will maximize the protection of individual workers and protect the environment.

4.0 CERTIFICATION

Laboratory analysis indicates the Material contains approximately seven to ten percent uranium. Processing costs to recover the uranium content from the Material are minimal, and the processing of this material will be profitable to EFN. Following is the Certification that the material is being processed primarily for recovery of uranium.

Certification of Energy Fuels Nuclear, Inc.
(the "Licensee")

I, Harold R. Roberts the undersigned, for and on behalf of the Licensee, do hereby certify as follows:

1. The Licensee is a Party Contract with Allied Signal ("Allied")/Converdyn, under which the Licensee will acquire certain material, in the form of potassium diurate in a solution of potassium hydroxide/potassium fluoride ("KOH/KF"), to process at the White Mesa Uranium Mill for the recovery of uranium concentrates. The Licensee hereby certifies and affirms that the KOH/KF Material is being processed primarily for the recovery of uranium and for no other primary purpose.

2. The Licensee further certifies and affirms that the KOH/KF Material is not "waste" as defined under the provisions of the Resource Conservation and Recovery Act because the KOH/KF Material has not been discarded or abandoned, but rather is a commercial product for which the Licensee is paying the supplier (Allied). The Licensee is obtaining the KOH/KF Material as feedstock for the uranium recovery process being conducted at the White Mesa Mill.


Signature

September 20, 1996
Date

Harold R. Roberts
President
Energy Fuels Nuclear, Inc.



P.O. BOX 3259 • CASPER, WY 82602 • PHONE (307) 235-0518
 8393 SALT CREEK HIGHWAY • CASPER, WY 82601 • FAX (307) 234-1639

ATTACHMENT 1

LABORATORY ANALYSIS REPORT

ENERGY FUELS NUCLEAR, INC.

Sample I.D.:

Laboratory I.D. #1

Sample Matrix:

Sample Date / Time:

Date Received:

Report Date:

KOH

96-53604

Soil

09-12-96

09-17-96

September 20, 1996

Radiometric	Method	Detection Limit	Units	Results	Date Analyzed
Uranium 234	Alpha Spec	0.02	pCi/g	8,200	09-20-96
Uranium 234 Precision ±				363	
Uranium 235	Alpha Spec	0.02	pCi/g	133	09-20-96
Uranium 235 Precision ±				46.2	
Uranium 238	Alpha Spec	0.02	pCi/g	4,080	09-20-96
Uranium 238 Precision ±				256	

Report Approved By:
 Inv# 96-53604u

COMPLETE ENVIRONMENTAL ANALYTICAL SERVICES

ATTACHMENT 2



ENERGY LABORATORIES, INC.

P.O. BOX 3258 • CASPER, WY 82602 • PHONE (307) 235-0515
2899 SALT CREEK HIGHWAY • CASPER, WY 82601 • FAX (307) 234-1639

EPA METHOD 8260

QC RESULTS - MATRIX SPIKE

Client: Energy Fuels Nuclear, Inc.
Sample Set: C96-53804
Laboratory ID: C96-46995 S
Matrix: Soil
Dilution: 20,000

Date Sampled: 08/12/96
Date Received: 08/17/96
Date Extracted: 09/17/96
Date Analyzed: 09/17/96
Date Reported: 09/18/96

INTERNAL STANDARDS

	ICAL / CCAL	SPIKED SAMPLE		SPIKE DUPLICATE		ACCEPTANCE
	AREA	AREA	%	AREA	%	RANGE
Pentafluorobenzene	1262306	1254275	99.4%	1290263	102%	50 - 200 %
Fluorobenzene	1829083	1805590	98.7%	1881988	103%	50 - 200 %
1,4 - Difluorobenzene	1617821	1601569	99.0%	1656637	102%	50 - 200 %
Chlorobenzene - d5	1190125	1214608	102%	1236139	104%	50 - 200 %
1,4 - Dichlorobenzene-d4	690090	711088	103%	680713	98.6%	50 - 200 %

SYSTEM MONITORING COMPOUNDS

	SPIKED SAMPLE	PERCENT	SPIKE DUPLICATE	PERCENT	ACCEPTANCE
	CONCENTRATION	RECOVERY	CONCENTRATION	RECOVERY	RANGE
Dibromofluoromethane	9.73	97.3%	9.71	97.1%	88 - 118 %
Toluene - d8	10.2	102%	10.2	102%	88 - 110 %
4 - Bromofluorobenzene	10.5	105%	9.81	98.1%	88 - 115 %
1,2 - Dichlorobenzene-d4	9.95	99.5%	10.1	101%	80 - 120 %

SPIKED SAMPLE RESULTS

	SPIKED SAMPLE	ORIG. CONC.	SPIKE AMOUNT	PERCENT	ACCEPTANCE
	CONCENTRATION	(mg/kg) *	(mg/kg)	RECOVERY	RANGE
Vinyl chloride	8.18	ND	10.0	81.8%	80 - 120 %
1,1 - Dichloroethene	10.2	ND	10.0	102%	80 - 120 %
2 - Butanone (MEK)	8.67	ND	10.0	86.7%	80 - 120 %
Chloroform	8.58	ND	10.0	85.8%	80 - 120 %
1,2 - Dichloroethane	8.61	ND	10.0	86.1%	80 - 120 %
Carbon tetrachloride	9.01	ND	10.0	90.1%	80 - 120 %
Benzene	9.06	ND	10.0	90.6%	80 - 120 %
Trichloroethene	8.98	ND	10.0	89.8%	80 - 120 %
Tetrachloroethene	8.67	ND	10.0	86.7%	80 - 120 %
Chlorobenzene	8.90	ND	10.0	89.0%	80 - 120 %
1,4 - Dichlorobenzene	8.77	ND	10.0	87.7%	80 - 120 %

SPIKE DUPLICATE SAMPLE RESULTS

	SPIKE DUP	ORIG. CONC.	SPIKE	PERCENT	RPD	RPD
	CONCENTRATION	(mg/kg) *	(mg/kg)	RECOVERY	RPD	LIMITS
Vinyl chloride	8.31	ND	10.0	83.1%	1.4%	10 %
1,1 - Dichloroethene	10.1	ND	10.0	101%	1.8%	10 %
2 - Butanone (MEK)	8.31	ND	10.0	83.1%	3.0%	10 %
Chloroform	8.72	ND	10.0	87.2%	1.6%	10 %
1,2 - Dichloroethane	8.88	ND	10.0	88.8%	0.6%	10 %
Carbon tetrachloride	9.16	ND	10.0	91.6%	1.7%	10 %
Benzene	9.19	ND	10.0	91.9%	1.4%	10 %
Trichloroethene	9.02	ND	10.0	90.2%	0.4%	10 %
Tetrachloroethene	9.05	ND	10.0	90.5%	2.9%	10 %
Chlorobenzene	9.00	ND	10.0	90.0%	1.1%	10 %
1,4 - Dichlorobenzene	8.80	ND	10.0	88.0%	1.5%	10 %

* Concentration includes dilution correction

MATRIX SPIKE: 0 of 22 Matrix Spike results are outside of established QC Limits

MATRIX SPIKE DUPLICATE: 0 of 11 Matrix Spike Duplicate results are outside of established QC Limits

Report Approved By: *[Signature]*

Report File: 96_83804.xls

Analyst: yw

Reviewed: ssc

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**ENERGY LABORATORIES, INC.**

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2593 SALT CREEK HIGHWAY • CASPER, WY 82601 • FAX (307) 234-1639

EPA METHOD 8260

Client: Energy Fuels Nuclear, Inc.
Sample ID: KOH
Laboratory ID: C96-63604
Matrix: Soil
Dilution Factor: 200

Date Sampled: 09/12/96
Date Received: 09/17/96
Date Extracted: 09/17/96
Date Analyzed: 09/17/96
Date Reported: 09/18/96

C.A.S. #	TARGET COMPOUNDS	CONCENTRATION (mg/kg)	LIMIT OF DETECTION (mg/kg)
75-71-8	Dichlorodifluoromethane	ND	0.20
74-87-3	Chloromethane	ND	0.20
75-01-4	Vinyl chloride	ND	0.20
74-83-6	Bromomethane	ND	0.20
75-00-3	Chloroethane	ND	0.20
75-68-4	Trichlorofluoromethane	ND	0.20
75-35-4	1,1 - Dichloroethene	ND	0.20
75-09-2	Methylene chloride	ND	0.20
156-60-5	trans - 1, 2 - Dichloroethene	ND	0.20
75-34-3	1,1 - Dichloroethane	ND	0.20
156-60-2	cis - 1,2 - Dichloroethene	ND	0.20
74-97-5	Bromochloromethane	ND	0.20
67-86-3	Chloroform	ND	0.20
594-20-7	2,2 - Dichloropropane	ND	0.20
71-35-8	1,1,1 - Trichloroethane	ND	0.20
107-08-2	1,2 - Dichloroethane	ND	0.20
563-66-6	1,1 - Dichloropropene	ND	0.20
56-23-6	Carbon tetrachloride	ND	0.20
71-43-2	Benzene	ND	0.20
74-95-3	Dibromomethane	ND	0.20
78-87-6	1,2 - Dichloropropane	ND	0.20
79-01-6	Trichloroethene	ND	0.20
78-27-4	Bromodichloromethane	ND	0.20
10061-01-6	cis - 1,3 - Dichloropropene	ND	0.20
10061-02-6	trans - 1,3 - Dichloropropene	ND	0.20
78-00-5	1,1,2 - Trichloroethane	ND	0.20
106-66-3	Toluene	ND	0.20
106-63-4	1,2 - Dibromoethane	ND	0.20
142-26-9	1,3 - Dichloropropane	ND	0.20
124-48-1	Dibromochloromethane	ND	0.20
127-18-4	Tetrachloroethene	ND	0.20
630-20-6	1,1,1,2 - Tetrachloroethane	ND	0.20
106-90-7	Chlorobenzene	ND	0.20
100-41-4	Ethylbenzene	ND	0.20
106-36-3	m,p - Xylenes	ND	0.40
78-26-2	Bromoform	ND	0.20
100-42-6	Styrene	ND	0.20
96-47-6	o - Xylene	ND	0.20
78-34-6	1,1,2,2 - Tetrachloroethane	ND	0.20
96-18-4	1,2,3 - Trichloropropane	ND	0.20

ND - Analyte not detected at stated limit of detection

**EPA METHOD 8260**

Client: Energy Fuels Nuclear, Inc.
 Sample ID: KOH
 Laboratory ID: C96-53604

Date Sampled: 09/12/98
 Date Analyzed: 09/17/98
 Date Reported: 09/18/98

C.A.S. #	TARGET COMPOUNDS	CONCENTRATION (mg/kg)	LIMIT OF DETECTION (mg/kg)
98-82-8	Isopropylbenzene	ND	0.20
106-96-1	Bromobenzene	ND	0.20
103-65-1	n - Propylbenzene	ND	0.20
95-49-8	2 - Chlorotoluene	ND	0.20
108-43-4	4 - Chlorotoluene	ND	0.20
108-87-8	1,3,5 - Trimethylbenzene	ND	0.20
98-06-6	tert - Butylbenzene	ND	0.20
95-83-6	1,2,4 - Trimethylbenzene	ND	0.20
135-96-6	sec - Butylbenzene	ND	0.20
641-73-1	1,3 - Dichlorobenzene	ND	0.20
106-46-7	1,4 - Dichlorobenzene	ND	0.20
99-87-8	4-Isopropyltoluene	ND	0.20
95-50-1	1,2 - Dichlorobenzene	ND	0.20
104-51-8	n - Butylbenzene	ND	0.20
99-12-8	1,2 - Dibromo - 3 - chloropropane	ND	1.00
120-82-1	1,2,4 - Trichlorobenzene	ND	0.20
81-20-3	Naphthalene	ND	0.20
87-68-3	Hexachlorobutadiene	ND	0.20
87-61-8	1,2,3 - Trichlorobenzene	ND	0.20

ND - Analyte not detected at stated limit of detection

INTERNAL STANDARDS	AREA	ICAL / COAL AREA	PERCENT RECOVERY	ACCEPTANCE RANGE
Pentafluorobenzene	1302258	1262306	103%	50 - 200 %
Fluorobenzene	1887114	1829083	103%	50 - 200 %
1,4 - Difluorobenzene	1673075	1617821	103%	50 - 200 %
Chlorobenzene - d5	1235719	1190125	104%	50 - 200 %
1,4 - Dichlorobenzene - d4	889768	890090	100%	50 - 200 %

SYSTEM MONITORING COMPOUNDS	CONCENTRATION	PERCENT RECOVERY	ACCEPTANCE RANGE
Dibromofluoromethane	9.53	95.3%	88 - 118 %
Toluene - d8	10.1	101%	88 - 110 %
4 - Bromofluorobenzene	10.2	102%	88 - 115 %
1,2 - Dichlorobenzene - d4	9.94	99.4%	80 - 120 %

REFERENCES

Method 8260: Volatile Organics by Gas Chromatography/Mass Spectrometry (GC/MS): Capillary Technique
 Test Methods for Evaluating Solid Waste, SW-846, Third Edition, USEPA, November 1990

Report File: 98_53604.xls

Analyst: yw
 Reviewed: sec



AlliedSignal Inc.
Nuclear/Fluorine Specialties
Route 45 North
P.O. Box 430
Metropolis, IL 62960 USA

618 524 2111
618 524 6239 Fax

September 12, 1996

Ms. Michelle Rehmann
Environmental Manager
Energy Fuels Nuclear Inc.
1515 Arapaho Street, Suite 900
Denver, CO 80202

Re: Contract between Energy Fuels & AlliedSignal
Subject - KOH Muds Drums

Dear Ms. Rehmann:

AlliedSignal intends to ship KOH Muds from present storage to the Energy Fuels mill when the integrity of the drum is acceptable and there is no removable moisture. However, when there is an environmental concern relative to moisture or drum integrity, the muds will be removed and transferred to a tank trailer for shipment as slurry and those drums that have contained KOH muds will be compacted and shipped to the Energy Fuels mill separately for disposal.

It should be noted that consideration was given to overpacks for drums of questionable integrity but this alternative was rejected due to the extreme cost, additional metal waste, and inability to control levels of moisture that might be present.

Sincerely,

A handwritten signature in cursive script that reads 'M. D. Kosmider'.

M. D. Kosmider
Plant Manager

MDK/sm