

History of Hazardous Waste Determinations at Cotter

April 28, 2011

November 19, 2002 CDPHE conducted a Resource Conservation and Recovery Act/Hazardous Waste Act facility inspection of the Cotter facility. Two hundred 55-gallon drums of used oil were viewed outside a warehouse, but were unmarked. The state issued a Compliance Advisory to Cotter instructing them to sample and analyze the material in the drums and provide that information to us.

June 2003 Waste oil analysis determined that the oil included benzene and *tetrachloroethylene (PCE), listed hazardous waste in Colorado.

August 2003 Material was consolidated, along with soils contaminated by spillage where the barrels were stored and drained into large shipment containers. Oil shipped off site to Tennessee where it was reused as heating fuel at a permitted and licensed treatment, storage and disposal facility

August 2003 Compliance Advisory was closed.

As far as the use of **trichloroethylene (TCE) use at the Cotter facility, there is only one note in Cotter history of having used TCE for anything. In that case the TCE was recovered and shipped off site. CDPHE has requested documentation about this activity

*tetrachloroethylene = tetrachloroethene = perchloroethylene = perchloroethene = perk = PCE

**trichloroethylene = trichloroethene = TCE

Cotter Cañon City Mill

Citizens Advisory Group

April 28, 2011

Cotter Site





Imagery Date: 6.21.2005

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39° 35' 70.74" N 105° 13' 33.30" W elev. 5557 ft

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GW Barriers & Dry Creek



GW Flow paths



SCS Dams, Hydraulic Barrier & PRTW/COW



April 21, 2010 RAP estimate:

Created from spreadsheets plus distribution of lump sums between license and RAP

Capital costs	\$8,037,000
Distributed lump sum	<u>\$7,028,000</u>
Total	15,066,000

October 26, 2010 RAP estimate:

Costs broken out as Capital, Recurring/Periodic Costs, O&M Costs, and Lump Sum costs applied to each phase individually

- We recalculated our burden down to 27% with state OH at 10.7%, and did not apply those rates to O&M. These were refined in the October letter and are about \$4,206,000, a reduction of \$2,821,900 from April.
- The April estimate applied our total overhead to work done under contract, which was incorrect; there is only a 1.5% charge on work done by contractor.
- Our estimate for NW gw was included in the April estimate and not in the October estimate (since its under the D&D surety). The April amount was \$3,600,000.

Reductions between 4/21/10 and 10/26/10 estimates:

lump sum/OH costs	\$2,821,900
NW plume from the estimate	<u>\$3,600,000</u>
Subtotal	\$6,429,951

The 4/21/10 total	\$15,066,000
minus the 10/26/10 reductions	<u>-\$6,429,951</u>
leaves	\$8,636,049

The final 10/26/10 number of \$9,921,561 reflects other changes made in scope, such as consolidating modeling, adding of wells, and a more detailed break out of periodic and O&M costs.