

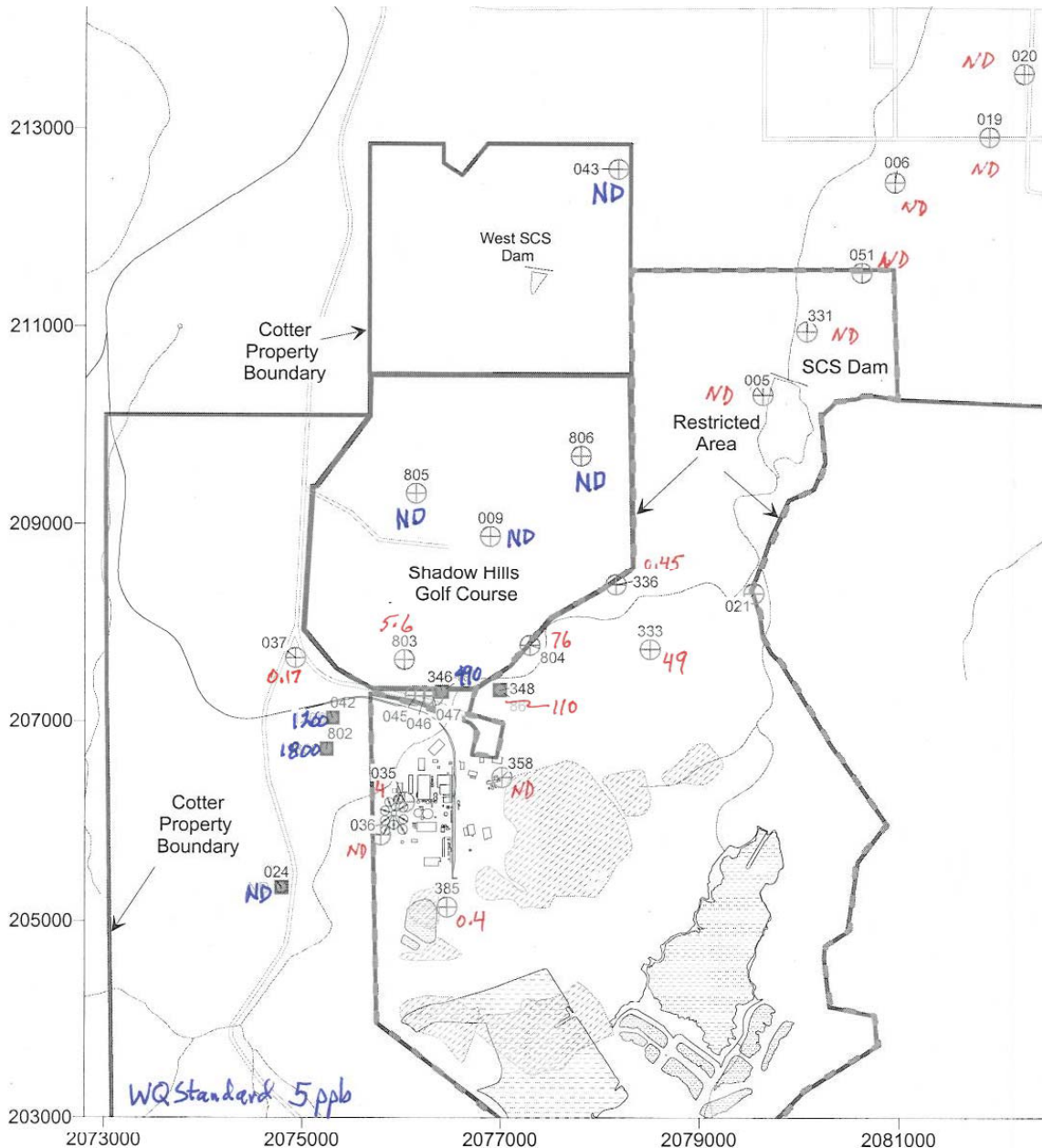
CDPHE Status Update

Citizens Advisory Group

6/23/11

TCE Detection

- Possibly from 1983-1984 project to remove PCB contamination from ore
- Cotter completed additional sampling and determined the extent was limited to site
- Cotter planning additional wells and soil vapor survey



<p>■ TCE Concentration 2/2011, PPB</p> <p>○ Proposed TCE Sample Location</p>	<p>Impoundments</p> <p>▨ Historic</p> <p>▤ Current</p>
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COTTER CORPORATION
CANON CITY MILLING FACILITY

Figure 4.
Proposed TCE Sampling Locations

By: EPL Checked: JC File ID: fin4GWMP.srf Date: 3/24/11

Community Involvement

- April 13, 2011 update to March 7, 2007 CDPHE Memo to CAG
- **Public information** – Agencies keep the public informed of activities and issues
- **Public involvement** – Agencies bring the public into discussion of activities and issues; includes public information
- **Public participation** – Agencies solicit public input to inform agency decision making; includes public involvement and public information; may be formal or informal

Project Schedule

- Cotter letter dated June 17, 2011
- Decommissioning structures to be completed this fall
- Soil removal to be initiated pending resolution of issues with CDPHE
- Impoundment closure pending resolution of issues with CDPHE
- Future use may be proposed through license amendment process

RAP/ROD

- Cotter has identified historic RAP completion reports for RAP actions
- Cotter assigning TQEM results to specific RAP tasks for inclusion in evaluation
- Cotter and CDPHE to review documentation to evaluate full scale LOE and what evaluation criteria should be used

More RAP/ROD

- EPA and CDPHE have tentatively identified five units:
 - Offsite Soils (2002 ROD exists)
 - Onsite Soils
 - Offsite groundwater (LP Plume, Dam to Ditch Plume, NW Plume)
 - Onsite Groundwater
 - Tailings Impoundments

Dam To Ditch

- GW group formulating next steps
- May propose flushing alternative originally approved in RAP

Mobility of Uranium and Molybdenum from Subsurface Materials Dam-to-Ditch Area

- **May 26, 2011, conclusions:**
- “...the results suggest that in situ leaching of the DDA materials with a selective extraction solution could be used ... If Cotter plans to pursue field pilot testing..., it is recommended that additional batch-leaching tests first be conducted to assess the effectiveness of various extraction solutions in removing uranium and molybdenum from the DDA soils and aquifer materials.”

Soil Study NW of Golf Course (AS 210)

- Elevated values appear to be associated with road bed materials
- Negligible dose risks to members of the public
- Microscopic/petrographic analysis pending for samples to determine if a slag or other pedigree

RAP Surety

- Cotter to provided undisputed financial surety amount (added \$500,656 to total \$3,133,288)
- Remaining disputed issues are lump sum percentages and how applied
- Mediation for disputed issues being scheduled

Decommissioning

- Post-December projects done (completion reports in process):
 - Secondary Crusher Building
 - Secondary Feed Building
 - Secondary Control Building
 - Storage Building South of Crisher
 - Grind Leach Building
 - GLB Pump House
 - GLB Air Compressor Building

More Decommissioning

- Catalyst Building
- Catalyst Unloading Bin
- Catalyst Building to the West
- Catalyst Pipe Rack
- Boiler Building
- Zirconium Building
- Silica Building

Grind Leach Building in April



Grind Leach Building in May



Soil Remediation Plan / Tailings Reclamation Plan

- CDPHE comments 5/13/11
- Technical discussions to be held in July
- Revised plans on hold pending resolution of comments
- Revised plans will go out for formal public comment

Additional Tailings Reclamation Documents

- Appendices Received
 - A. NRC Review Checklist
 - B. Surface and Channel Hydraulic Analyses
 - C. Erosional Stability Analyses
 - G. Erosion Protection Material Evaluation
 - I. Tailings dewatering Plan
 - J. Settlement Monitoring Plan

More Additional Tailings Reclamation Documents

- Appendices Due:
 - D. Radon Emanation Analyses (6/30)
 - E. Cover Infiltration Analyses (6/30)
 - F. Cover Borrow Material Evaluation (6/30)
 - H. Technical Specifications For Tailings Impoundment Reclamation (7/29)