

## Lincoln Park/Cotter Superfund Community Advisory Group September 22, 2011

### Cotter's Lincoln Park Well Monitoring Plan/Proposal

- Brief Overview of Plan (see 8/23/11 work plan)

Project involves adding 5 or 6 new wells and replacing 4 or 5 wells currently sampled to improve data quality and control (ten wells total). Parallel sampling will occur for a year in replacement wells. Wells will continue to be sampled quarterly; discontinued wells will be sampled in the water use survey every five years. Monitoring follows existing procedures in the QAPP and SOPs.

- Plan for addressing CCAT and EPA Comments?

Comments were shared with Cotter. Adjustments to the work plan will be discussed, and responses provided

- Plan for rescinding CDPHE's approval of Cotter's Proposal  
None

### Allegation of Hydrogen peroxide dumping into Primary Impoundment

- Did CDPHE follow up with Cotter contractor who was at last CAG meeting? What was learned?

Yes. We discussed this with the operator who made the complaints. His complaints were relative to Kessler work arrangements; he was complimentary of Cotter's rad protection staff and did not want to make a formal allegation against Cotter. He followed up a couple days later saying he still has his job and is moving forward.

- Was there a violation on Cotter's part with regard to dumping the hydrogen peroxide in the Primary Impoundment - if not, why not?

It is not a violation. It was not 90% peroxide, that would have been a highly exothermic reaction (explosion), not bubbling... Cotter states it was originally 50% and had likely degraded over time, as it has a shelf life. Cotter used a stainless steel tanker to deliver the peroxide to the primary and controlled the release using the valves. The peroxide could not be sold or returned to vendor. Once in the impoundment, it is rendered moot as it is consumed and turns into water and oxygen.

### License Financial Assurance

- Status of June 2011 RML Surety Update

Cotter requested schedule extension for completion of building decommissioning and deferral of surety amounts for those two buildings in a 9/17/11 letter; this was accepted in a 9/20/11 letter. Cotter paid an additional \$781,951 increasing the total to \$17,481,951.

- Cotter accepted it? Sixty days expired Sept 9.
- CDPHE plan for addressing public comments

Comments responded to in individual letters dated 9/13/11.

### RAP Surety & Mediation

- Mediation occur?
- Key issues going into mediation?
- Mediation successfully concluded?
- If successful, what's RAP Surety Amount?
- If unsuccessful, what are open issues?

On the day of mediation, Cotter and the department negotiated an agreement to override the disputes. Remediation projects are accelerated, and a surety amount is accepted with deferral of payment for near-term actions. A RAP addendum is expected. See slides for details.

#### Decommissioning and Reclamation Plan Documents

- Comprehensive Reclamation Plan and Strategy (June 17)
  - Missing timeline - when will Cotter produce it?
  - Status of CDPHE response -- issues CDPHE sees & expected date for CDPHE response?
- See September 9, 2011 letter and slides for details.

#### Soil Remediation Plan (Proposal of 3/20/11)

Status of additional site characterization of the Mill area for conceptual model

- Cotter agree to do the work?
  - Deliverable due November 8 -- a plan for doing the job
- See September 9, 2011 letter and slides for details.

#### Reclamation Plan for Primary and Secondary Impoundments

- August CAG Meeting CDPHE Status Update indicated appendices revisions to occur following acceptance of revised cover concept
- When is Revised Cover Concept Expected?
- August CAG Meeting CDPHE Status Update indicated comments were under development
- Status of comments?
- When will comment be released to Cotter?
- Major issues of concern to CDPHE?
- Provide the milestones associated with Primary Impoundment Closure?

See September 9, 2011 letter and slides for details. Major issues are additional technical basis for cover design, specifically the radon barrier, and infiltration modeling. The complete reclamation plan and appendices must be submitted with the license renewal application by December 31, 2011.

#### Impoundment Leakage

- Monitoring continues; reviewing data
- Provide specifics on monitoring: what, where, frequency, sampling data results, current findings from reviewing data
- What is CDPHE plan for resolving this issue?
- Resolution process?
- Expected date of resolution?

Specifics of monitoring are included in the annual and quarterly reports. Details of our review will be discussed when it is completed.

#### RAP/ROD Forward

- Current Status of RAP Completion Review
- Describe process
- Percent Complete?
- Findings to date?
- Expected Review completion date?

Cotter's summary review is expected 9/23/11.

#### Dam to Ditch Study

- "looking at enhanced leachate solutions"
- What's purpose of "enhanced leachate solutions"?
- What is November 7 Report to achieve?

Issues associated with the dam-to-ditch area (also known as 006) were discussed at the January 2011 meeting. Details of the work underway are presented in the August 1, 2011 work plan. The concept is to determine whether different chemical solutions would increase the effectiveness of mobilizing uranium and molybdenum in the saturated or unsaturated zones in this area.

#### Soil Study NW of Golf Course

- Current Status?
- No change from report on June 23, 2011.

#### Golf Course (NW) Plume

- What is monitored?
- What is plan?
- Learning to date?

Monitoring continues. The plume does not appear to be moving; it does not appear to be adding to the Lincoln Park plume; and no one is exposed to the contamination.

#### TCE in Ground Water

- What is the intent of the report due October 10?
- Who is generating the report?

See the July 27, 2011 work plan for details. The question to be answered is whether soil vapor can be used to map the plume and guide the placement of additional wells to further characterize the contamination.

#### Community Involvement Plan

- Interviews October 11 – 13, 2011
- Draft early December 2011

# CDPHE Status Report

Canon City Citizens Advisory group

September 22, 2011

# Building Demolition

- Product Building and SX Building demolition in process; to be completed by December 31
- A few incidental buildings and facilities to be removed subsequently
- Structures to remain include laboratory, change house, guard shack, main substation, railroad structures and maintenance shop; subject to future demolition

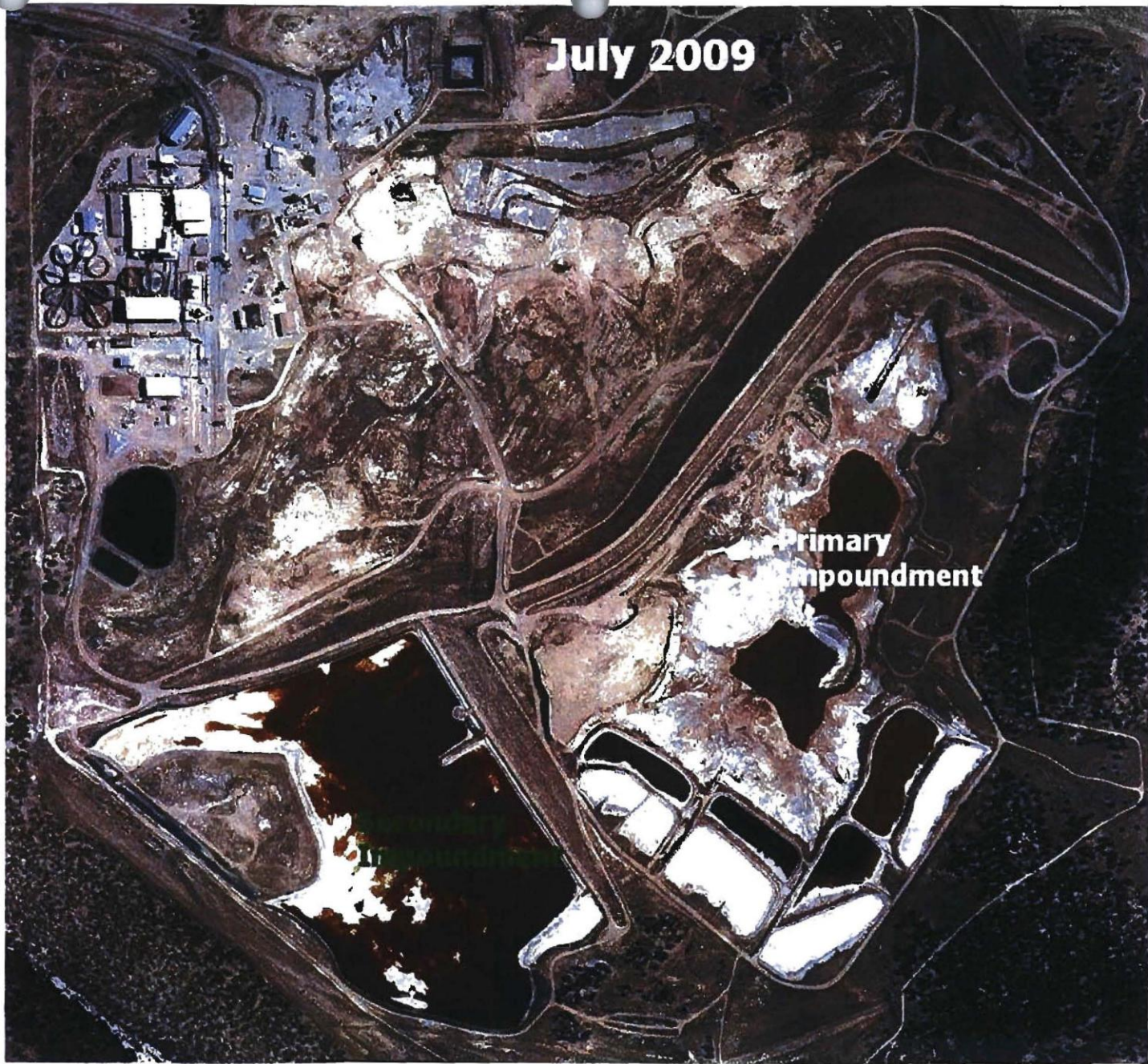
6-27-2006

Primary  
Impoundment



**July 2009**

**Primary  
Impoundment**



**8-10-2010**

**Primary  
Impoundment**

**Secondary  
Impoundment**



August 10, 2011



# RAP Mediation

Cotter will immediately begin the following projects:

- Lincoln Park
  - New wells construction by January 18, 2012
  - Ditch lining construction by November 16, 2012
- 006 (DTD) Flush and treat system
  - Modeling by February 7, 2012
  - Construction by December 7, 2012
- Facility
  - Trench construction by October 19, 2012
- New evaporation pond
  - Presented in license renewal
  - Construction by June 17, 2013

Accept RAP surety estimate of \$6,891,808; defer \$3,666,282 for above projects

# Schedules and Process

- Building Decommissioning
  - Largely complete by December 2011
- Impoundment Reclamation
  - Revised plan rejected in May 2011
  - Discussions ongoing; revision underway
- Onsite soils and groundwater
  - additional characterization of Mill area for conceptual model; plan due November 8
  - TCE soil vapor phase I results October 10

# Schedules and Process (cont'd)

- Offsite groundwater
  - Near-term RAP projects discussed above
  - Ongoing monitoring of Golf Course plume
  - Results of monitoring and projects will lead to a decision process
- License renewal
  - Application due December 31, 2011
  - Full public review process
  - Includes impoundment reclamation plan, proposed evaporation pond, etc.



# 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