

# STATE OF COLORADO

Bill Ritter, Jr., Governor  
James B. Martin, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.  
Denver, Colorado 80246-1530  
Phone (303) 692-2000  
TDD Line (303) 691-7700  
Located in Glendale, Colorado

Laboratory Services Division  
8100 Lowry Blvd.  
Denver, Colorado 80230-6928  
(303) 692-3090

<http://www.cdphe.state.co.us>



Colorado Department  
of Public Health  
and Environment

JUN 14 2007

Rec'd 6-18-07  
OSH

Mr. John Hamrick  
Cotter Corporation  
P. O. Box 1750  
Cañon City, Colorado 81215-1750

RE: Cotter Corporation Cañon City Mill  
Impoundments evaluation

Dear Mr. Hamrick:

The Colorado Department of Public Health and Environment (the Department) has received quarterly ground water monitoring reports from the Second Quarter 2006 to the First Quarter 2007 and a Geophysical Results report for a resistivity survey performed adjacent to, and near, the presently used Cotter Cañon City Mill facility impoundments (the Impoundments). The information submitted in these reports has been analyzed to determine if there is credible physical evidence of a release from the impoundments.

Based on the evidence presented, the Department determines there is not a major release of contaminants from the impoundments. This determination is made based on physical, geophysical, and chemical evidence.

Based on the evidence presented, the Department determines there is evidence of a minor release of contaminated material from the Primary Impoundment as evidenced by physical and chemical evidence found in monitor well 379 as compared to surrounding wells during the evaluation period. The release does not appear to have a major impact on groundwater. Comparing the hydrographs of well 379 with up and down gradient wells does not show a significant impact from the de-watering of Pond 3. A comparison of dissolved magnesium (Mg) to calcium (Ca) ratios shows well 379 water to have a statistically different composition from the waters sampled by the surrounding well population. The piezometric surface near well 379 shows evidence of water being added to the ground water system. All these lines of evidence contribute to the Department's determination.

The ground-water monitoring program now being implemented will continue. At the completion of the Readiness Review and the De-watering and Dry Placement studies, the Department will determine the impact of this leakage on facility operations.



RECEIVED  
COTTER CORP  
Radiation Safety Dept.

JUN 18 2007

Distribution:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Cotter Corporation  
Page 2

The Department expects to meet with representatives of the Cotter Corporation to review data interpretation. If you have any questions, or would like to set up a meeting, please call Edgar Ethington at (303) 692-3438, me at (303) 692-3423.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve Tarlton". The signature is stylized and cursive.

Steve Tarlton  
Radiation Management Unit Leader  
Compliance Program

CC Jerry Goad; AGO  
Pat Smith; EPA