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HAZARDOUS MATERIALS
AND WASTE MANAGEMENT

cotter

February 18, 2011

Mr. Steve Tarlton, Program Manager
Radiation Control Program
Hazardous Materials and Waste Management Division
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

Subject: Completion Reports

Dear Mr. Tarlton,

Please find enclosed the completion reports for the previously submitted surety offset request.

If you have any questions, please do not hesitate to contact me @ (719) 275-7413 ext. 202 or john.hamrick@cotterusa.com.

Sincerely,

John Hamrick
Vice President, Mill Operations

JH: kju

cc: Amory Quinn
Jim Cain

Cotter Corporation
Cañon City Mill, P.O. Box 1750, Cañon City, CO 81215-1750 USA

Telephone (719) 275-7413
Fax (719) 275-1669

Surety Offset - Through 12-31-10				
	Burden factor (898750/500000)	1.7975		
	Project	**Unburdened**	**Burdened**	**Description**
1	CCDs (does not include Primary Thickener, RCL or #10 Clarifier/Neutralization thickener))	$ 500,000.00	$ 898,750	CDPHE number
2	CCD Soil (50%)	$ 90,000.00	$ 161,775	CDPHE number
3	Secondary Impoundment (adjusted) (41.7/51.4)	$ 365,077.82	$ 656,227	CDPHE number
4	Secondary Crusher Bag Houses	$ 11,436.90	$ 20,558	Three bag houses, steel frame, electric panels, pumps, pump houses, foundation, 24 inch and 16 inch air ducts
5	Secondary Crusher Conveyor	$ 5,006.95	$ 9,000	Conveyor belt to crusher, steel conduit, conveyor I-beam support, foundations
6	Secondary Crusher Grizzly	$ 1,757.75	$ 3,160	Grizzly building, foundations, hopper, grizzly screen, drive and motor
7	Grind Leach Conveyor ($72,111.33 is the 12-13-10 amount)	$ 64,755.97	$ 116,399	FOB conveyor to grind, Primary Thickener, Primary Thickener bridge and drive, Reactor Clarifier bridge and drive, Reactor Clarifier wood tank, neutralization tanks (3) and foundations, pump sheds, #10 clarifier/neutralization, foundations, bridge, misc. tanks
8	Pipe Rack (88%)	$ 127,431.95	$ 229,059	1,520 linear feet of pipe rack out of 1,720 linear feet (88%) - Catalyst area, north side of kiln, pipe rack to Zr product building, pipe rack from west side of product building, boilers to north grind building, pipe rack west of lime building, pipe rack east of fine ore building
9	Primary Crusher Day Ore Bin, Conveyor & Baghouse	$ 14,614.22	$ 26,269	Day ore bin, conveyor, grizzly, steel building, foundations
10	Schwartz Ore Crusher and Foundations	$ 6,772.42	$ 12,173	Conveyor concrete house, foundations, steel building, bag house
11	Old Mill Electric Shop	$ 11,689.43	$ 21,012	Steel frame building and foundations
12	Old Mill Office Shop	$ 14,895.88	$ 26,775	Corrugated metal siding, wood frame, foundations
13	Kiln Building	$ 29,747.72	$ 53,472	Multi story east building
14	Kiln Bearing Foundation 1	$ 4,485.79	$ 8,063	Kiln tube foundation
15	Kiln Bearing Foundation 2	$ 10,317.32	$ 18,545	Kiln tube foundation plus donkey motor
16	Kiln Discharge End Tankage	$ 4,686.22	$ 8,423	Tanks and foundations at discharge end
	Total		$2,269,661	

#1 CCD Area Demolition Report

Surety Offset Requested: Unburdened $500,000 Burdened $898,750

This report summarizes the Mill Facility Removal demolition of the Counter Current Decantation (CCD) Thickener units 1 -9 and the CCD Building. These demolition activities commenced in April 2010 and were completed by mid-December 2010 and were completed in accordance with all applicable legal and regulatory requirements. The project goals of safe work and using the ALARA philosophy to minimize dose to workers and the public were achieved.

1. History - These sections of the milling facility were constructed in the late 1970's as part of the milling facility that commenced operation in 1979. The 1979 milling facility was constructed to the West of the original 1957 milling facility.

2. Pre-demolition activities – A certified Asbestos Building Inspector inspected/performed sampling in the facilities described above, provided instructions for removal and disposition of asbestos materials and provided the documentation required to apply for demolition permits from the Colorado Department of Public Health and Environment Air Pollution Control Division. Ten Colorado demolition permits were received and used to obtain Fremont County demolition permits from the Fremont County Building Department.

	CCD 1	CCD 2	CCD 3	CCD 4
Colorado Demolition Permit #	10FR1347D	10FR1348D	10FR1349D	10FR1350D
Fremont County Demolition Permit #	D10-007	D10-008	D10-009	D10-010

CCD 5	CCD 6	CCD 7	CCD 8	CCD 9	CCD Bldg
10FR1351D	10FR1352D	10FR1353D	10FR1354D	10FR1355D	10FR2401D
D10-011	D10-012	D10-013	D10-014	D10-015	D10-020

All soil transport activities were conducted under the Airs 71 sitewide air permit.

All nuclear density gauges were removed from the demolition areas and placed in secure storage prior to starting demolition activities.

Run-in/run-off berms were constructed prior to the commencement of demolition activities. Process lines were emptied at circuit shutdown and during a prior hazard reduction process. Oil was drained and collected from all gearboxes and devices.

Utilities were disconnected prior to demolition activities. There was one occasion where, due to confusion in terminology of area title boundaries, the excavator mounted shear cut into an active electrical line. This incident was investigated and a new utility disconnect verification signoff sheet with an attached diagram of the area to be signed off was created and has been utilized for all subsequent demolition.

3. Radiation, Industrial Safety and project specific training on the CCD Demolition Work Plan was conducted on 5-18-10 for all contractor employees and Cotter personnel involved with the demolition. Ongoing training was provided for new individuals entering the project.

4. Demolition Activities – The CCD units and building were removed utilizing track mounted excavators equipped with shears, buckets, grappling thumbs and rock breakers to demolish, size and then load the demolition materials into trucks for transport to the disposal area. Wheel mounted loaders and backhoes were also used to load trucks. Water spray was used to control dust. Fire water and mill water systems as well as a water truck with a remote control operated water cannon were utilized for demolition area dust control. Water trucks with spray bars and/or the water cannon were used for dust control on transport areas and laydown areas. The demolition materials were placed in the Primary Impoundment and the majority of the material has been covered with random soil fill. Large pipes or vessels were crushed or filled with soil or sand to minimize void spaces prior to placement.

   The Counter Current Decantation (CCD) removal project began on 5-20-10 and was completed on 10-12-10.

   The total constructed volume of the materials removed from these areas was 168,545 ft^3. CCD area soils were removed to a nominal level of 60 uR for ALARA purposes.

5. ALARA – Demolition activities were reported on and discussed during daily meetings attended by the RSO and/or the ARSO and The Health and Safety Supervisor. Environmental and occupational monitoring results are evaluated during the monthly ALARA review meeting. Environmental Monitoring at the perimeter site boundaries is part of the routine monitoring program. Since the Old Mill Electric Shop demolition in April 2009 and initiation of interim closure of the Secondary Impoundment in the Third Quarter of 2009 through the 2010 demolition of the Old Mill Office Shop, the CCD Tanks, miscellaneous piperacks, conveyors and baghouses, Environmental air particulate data as judged by weekly dust loading, weekly gross alpha and quarterly composite for individual uranium series radionuclides have demonstrated compliance with standards and results within historical limits for the past 30 years of record. Typical results are that most radionuclides are less than 10% of the standard. For radon, additional measuring stations were added for the Secondary Impoundment project in 3rd quarter 2009 and all monitoring stations have been in compliance with the standards. Data for the fourth quarter 2010 is not yet available. This monitoring information and detailed evaluation is presented in the semiannual effluent report as well as the annual report. The Grind Leach Conveyor project was similar in nature to the CCD project. The occupational and environmental sampling summary for the CCD and Grind Leach Conveyor projects is shown below.

Occupational and Environmental Sampling Results

GENERAL AIR SAMPLES BY DEMOLITION PROJECT	1st sample	Last Sample	Number of samples
CCD and Grind Leach Conveyor	04/05/10	12/6/10	260

BREATHING ZONE SAMPLES BY DEMOLITION PROJECT	1st sample	Last Sample	Number of samples
CCD and Grind Leach Conveyor	04/08/10	12/1/10	318

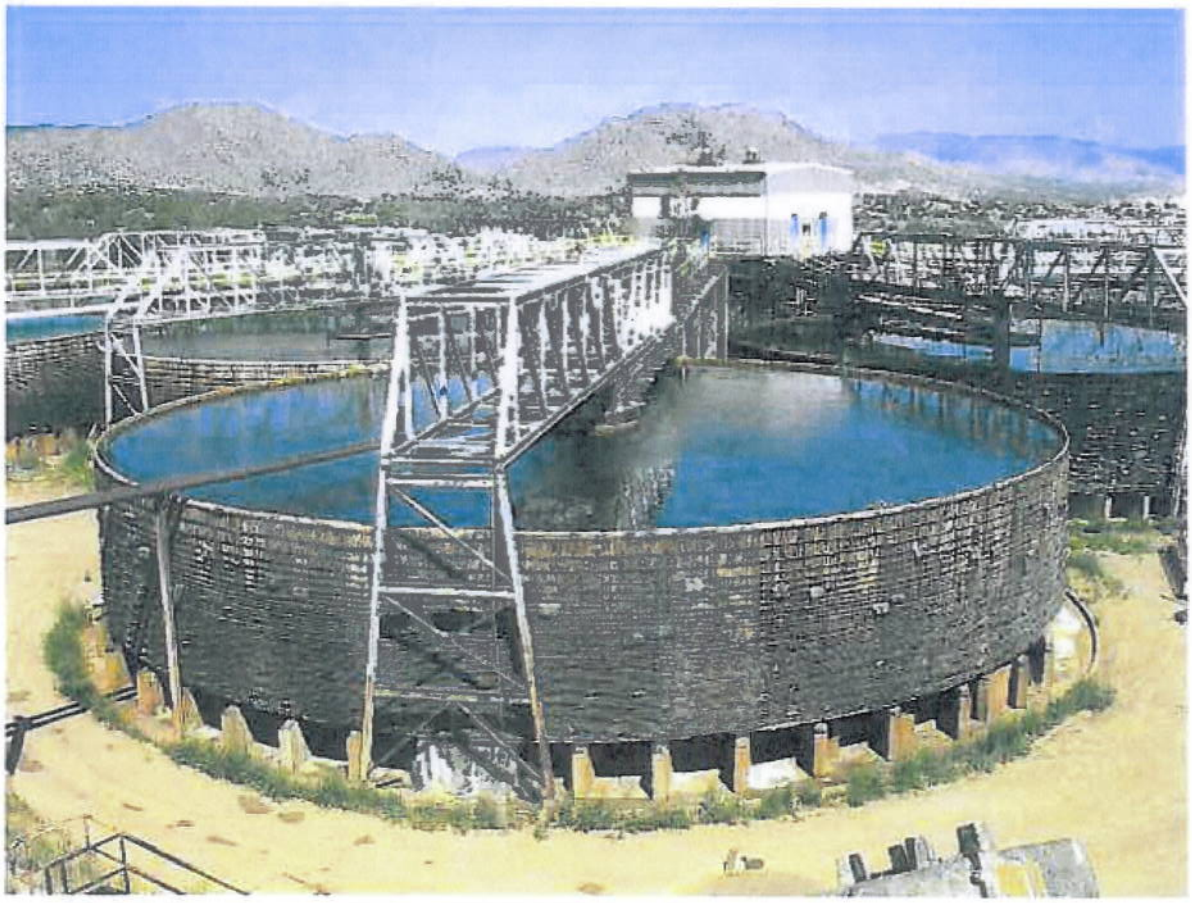
GENERAL AIR SAMPLES BY DEMOLITION PROJECT	MAX % DAC sample	AVG % DAC for project
CCD and Grind Leach Conveyor	7.9	0.9

BREATHING ZONE SAMPLES BY DEMOLITION PROJECT	MAX DAC HR sample	AVG DAC HRS for project
CCD and Grind Leach Conveyor	4.1	0.7

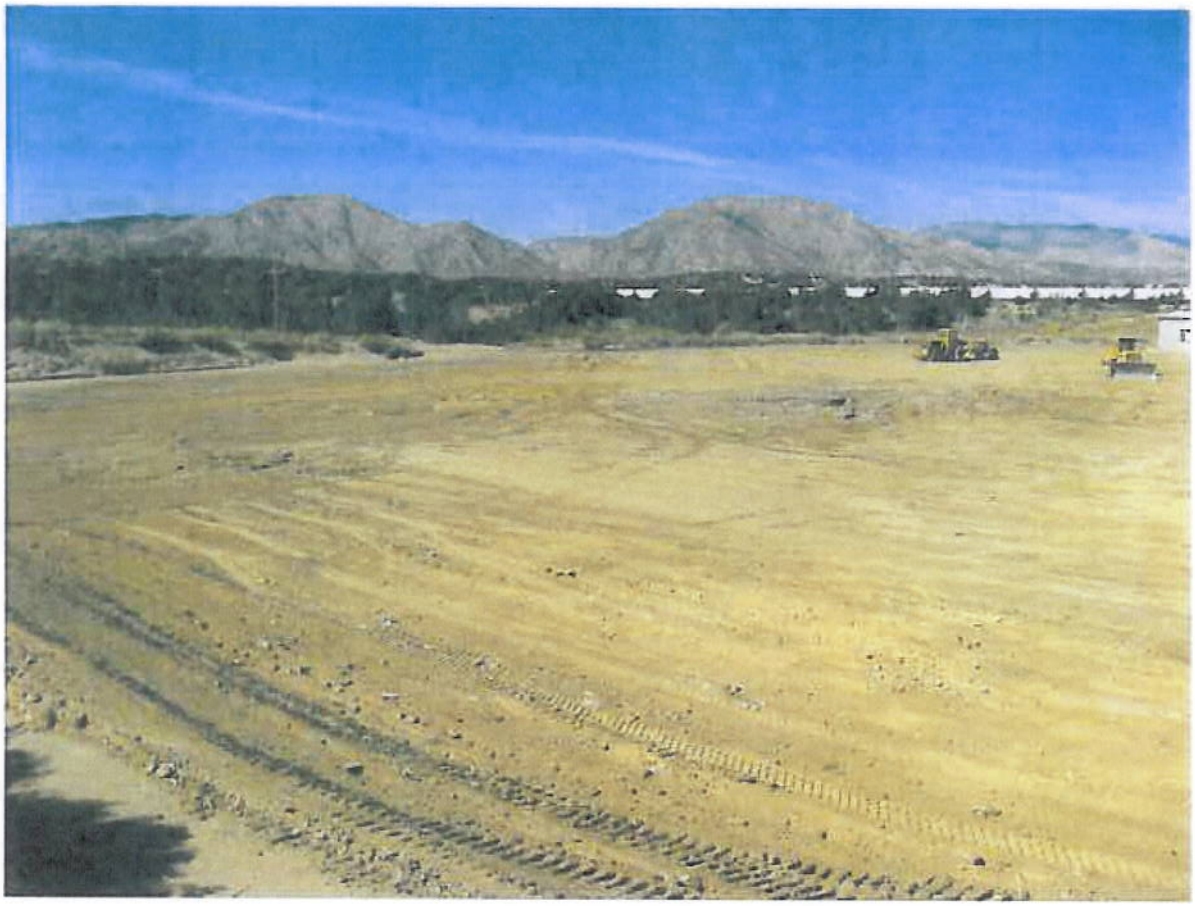
6. The AIRS 71 permit, the demolition permits, environmental monitoring data, personnel exposure data, dust condition reports and the constructed materials volume calculations associated with this report will be archived in the decommissioning records area with a copy of this report.

Page 5 is a pre-demolition view with pages 6 and 7 showing post-demolition views of the CCD area.

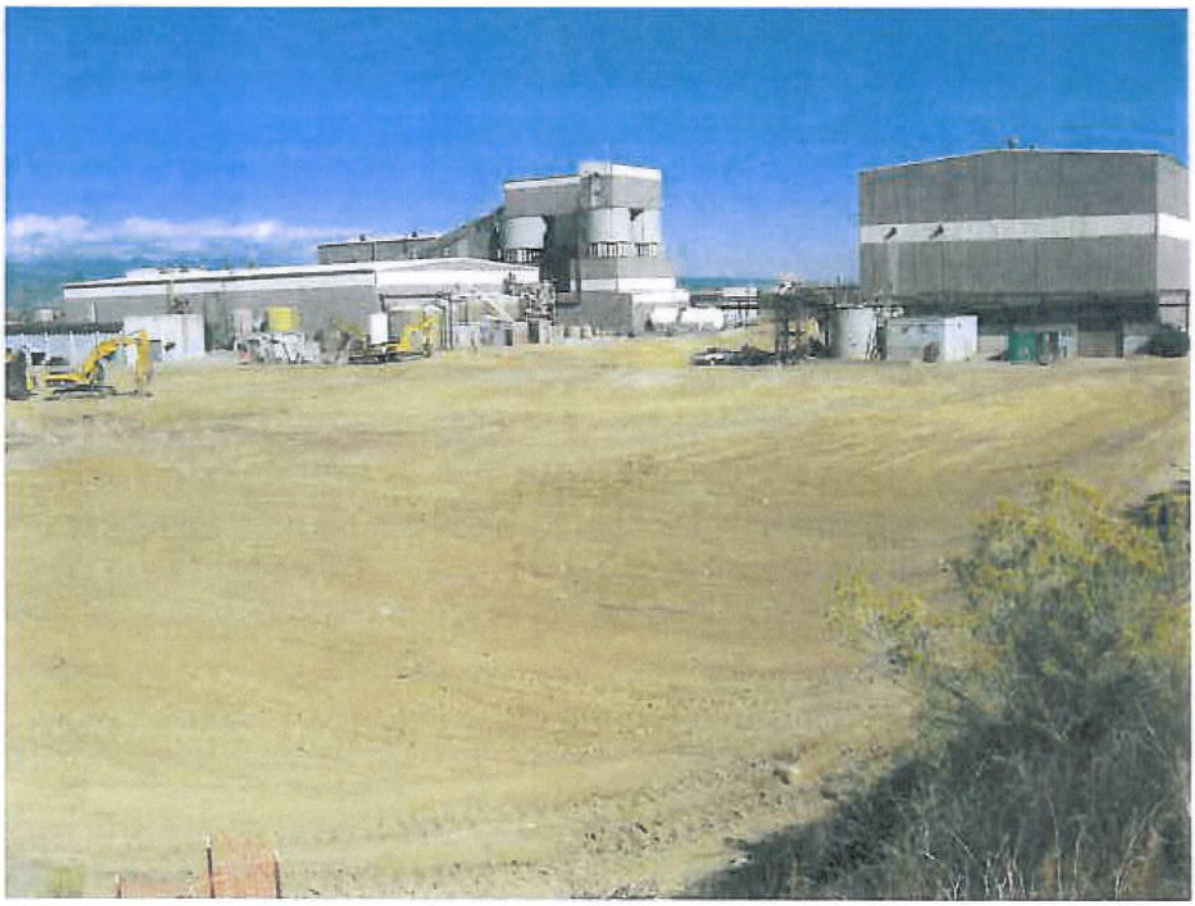
PRE-DEMOLITION



POST DEMOLITION NORTHWEST



POST DEMOLITION NORTHEAST



#3 Secondary Impoundment Construction Report

Surety Offset Requested for covering 41.7 of the 51.4 acres (81.1%):

Unburdened: $365.077.82 Burdened: $656,227

This report summarizes the Mill Facility construction project for the placement of the interim cover on the Secondary Impoundment. This project was started in November, 2009 and was completed when the final grading for drainage was completed in December of 2010 in accordance with all legal and regulatory requirements. The project goals of safe work and using the ALARA philosophy to minimize dose to workers and the public were achieved.

1. History - The Secondary Impoundment was constructed in the late 1970's as part of the construction of the milling facility that commenced operation in 1979. The Secondary Impoundment was constructed for placement of the alkaline tailings produced from 1957-1979. The Secondary Impoundment capacity was increased in 1989 to provide additional evaporative area.

2. Pre-construction activities – An interim cover placement test cell study was completed in August of 2009. Based on the study, mixing the tailings sludge of the surface with soil provided a stable cover that would support the heavy equipment used for the cover placement. All soil transport activities were conducted under the AIRS 71 sitewide air permit.

   Utility disconnects were not required for this construction activity.

3. Radiation, Industrial Safety and project specific training on the Secondary Impoundment interim cover construction was conducted on 8-4-09 and on 10-6-09 for all contractor employees and Cotter personnel involved with the demolition. Ongoing training was provided for new individuals entering the project.

4. Construction Activities – Water trucks with spray bars and/or a water cannon were used for dust control on soil borrow areas, transport areas and soil cover areas. Loaders, backhoes and excavators were used to load trucks and place the soil cover. A motor grader was used for final surface grade establishment. The interim cover placement was initially conducted as determined by the test cell study that was completed in August of 2009. Based on the study, mixing the tailings sludge of the surface with soil provided a stable cover that would support the heavy equipment used for the cover placement. Mixing with soils was discontinued when soil placement directly onto the tailings surface was found to be acceptable for heavy equipment support.

   During the placement of the interim cover periodic gamma surveys were conducted to determine the gamma levels on the Secondary Impoundment. Some areas with elevated gamma readings were excavated and refilled with suitable soils. Global Positioning Surveys (GPS) were conducted to check the grade of the cover material. Once the cover

was complete a final gamma and GPS survey was conducted. Additional cover material was added to those areas where elevated gamma levels were detected. After the completion of the cover project the area was treated with a soil binder to prevent dusting and wind erosion.

339,736 tons of the soil was placed in the Secondary Impoundment to construct an interim cover of a minimum thickness of two feet of soil.

5. ALARA – Construction activities were reported on and discussed during daily meetings attended by the RSO and/or the ARSO and The Health and Safety Supervisor. Environmental and occupational monitoring results are evaluated during the monthly ALARA review meeting. Environmental Monitoring at the perimeter site boundaries is part of the routine monitoring program. Since the Old Mill Electric Shop demolition in April 2009 and initiation of interim closure of the Secondary Impoundment in the Third Quarter of 2009 through the 2010 demolition of the Old Mill Office Shop, the CCD Tanks, miscellaneous piperacks, conveyors and baghouses, Environmental air particulate data as judged by weekly dust loading, weekly gross alpha and quarterly composite for individual uranium series radionuclides have demonstrated compliance with standards and results within historical limits for the past 30 years of record. Typical results are that most radionuclides are less than 10% of the standard. For radon, additional measuring stations were added for the Secondary Impoundment project in 3rd quarter 2009 and all monitoring stations have been in compliance with the standards. Data for the fourth quarter 2010 is not yet available. This monitoring information and detailed evaluation is presented in the semiannual effluent report as well as the annual report. An occupational and environmental sampling summary for the Secondary Impoundment soils placement project is shown below.

Occupational and Environmental Sampling Results

GENERAL AIR SAMPLES	1st sample	Last Sample	Number of samples
Secondary Impoundment	08/03/09	12/27/10	110

BREATHING ZONE SAMPLES	1st sample	Last Sample	Number of samples
Secondary Impoundment cover	08/04/09	12/29/10	224

GENERAL AIR SAMPLES BY DEMOLITION PROJECT	MAX % DAC sample	AVG % DAC for project
Secondary Impoundment	1.4	0.1

BREATHING ZONE SAMPLES BY DEMOLITION PROJECT	MAX DAC HR sample	AVG DAC HRS for project
Secondary Impoundment cover	1.7	0.2

6. Records - The AIRS 71 permit, environmental monitoring data, personnel exposure data, dust condition reports and construction materials tracking associated with this report will be archived in the decommissioning records area with a copy of this report.

Page 5 is a pre-construction view and page 6 is a post-construction view of the Secondary Impoundment surface.

PRE-CONSTRUCTION

POST CONSTRUCTION

#4, 5 and 6 Secondary Crusher Bag Houses, Conveyor and Grizzly Demolition Report

Surety Offset Requested:

Bag Houses Unburdened	$11,436.90	Burdened $20,558
Conveyor Unburdened	$ 5,006.95	Burdened $ 9,000
Grizzly Unburdened	$ 1,757.75	Burdened $ 3,160
Total	$18,201.60	$33,045

This report summarizes the Mill Facility Removal demolition of the Secondary Crusher feed conveyor, feed grizzly and three baghouses. These demolition activities commenced in late October 2010 and were completed by late December 2010 in accordance with all legal and regulatory requirements. The project goals of safe work and using the ALARA philosophy to minimize dose to workers and the public were achieved.

1. History - These sections of the milling facility were constructed in the late 1970's as part of the milling facility that commenced operation in 1979. The 1979 milling facility was constructed to the West of the original 1957 milling facility.

2. Pre-demolition activities – An asbestos survey conducted in 2001 did not require abatement of asbestos in the components to be demolished.

   All soil transport activities were conducted under the AIRS 71 sitewide air permit.

   Run-in/run-off berms were not required for this project. Process lines were not present in this area. Oil was drained and collected from all gearboxes and devices.

   Utilities were disconnected prior to demolition activities. The utility disconnect verification signoff process was utilized for this demolition project.

3. Radiation, Industrial Safety and project specific training on the Hazardous work Permit for demolition of the Secondary Crusher external components on 10-25-10. Training for Radiation Work Permit 880 - baghouse removal, was conducted on 11-1-10. Both training sessions were for all contractor employees and Cotter personnel involved with the demolition. Ongoing training was provided for new individuals entering the project.

4. Demolition Activities – The Secondary Crusher external components were removed utilizing track mounted excavators equipped with shears, buckets, grappling thumbs and rock breakers to demolish, size and then load the demolition materials into trucks for transport to the disposal area. Wheel mounted loaders and backhoes were also used to load trucks. Water spray was used to control dust. Fire water and mill water systems as well as a water truck with a remote control operated water cannon were utilized for demolition area dust control. Water trucks with spray bars and/or the water cannon were used for dust control on transport areas and laydown areas. The demolition materials were placed in the Primary Impoundment and the majority of the material has been

covered with random soil fill. Large pipes or vessels were crushed or filled with soil or sand to minimize void spaces prior to placement.

The Secondary Crusher external components removal project began on 11-3-10 and was completed on 12-30-10.

The total constructed volume of the materials removed from these areas was 7,871 ft^3.

5. ALARA – Demolition activities were reported on and discussed during daily meetings attended by the RSO and/or the ARSO and The Health and Safety Supervisor. Environmental and occupational monitoring results are evaluated during the monthly ALARA review meeting. Environmental Monitoring at the perimeter site boundaries is part of the routine monitoring program. Since the Old Mill Electric Shop demolition in April 2009 and initiation of interim closure of the Secondary Impoundment in the Third Quarter of 2009 through the 2010 demolition of the Old Mill Office Shop, the CCD Tanks, miscellaneous piperacks, conveyors and baghouses, Environmental air particulate data as judged by weekly dust loading, weekly gross alpha and quarterly composite for individual uranium series radionuclides have demonstrated compliance with standards and results within historical limits for the past 30 years of record. Typical results are that most radionuclides are less than 10% of the standard. For radon, additional measuring stations were added for the Secondary Impoundment project in 3rd quarter 2009 and all monitoring stations have been in compliance with the standards. Data for the fourth quarter 2010 is not yet available. This monitoring information and detailed evaluation is presented in the semiannual effluent report as well as the annual report. An occupational and environmental sampling summary for this demolition project is shown below.

Occupational and Environmental Sampling Results

GENERAL AIR SAMPLES BY DEMOLITION PROJECT	1st sample	Last Sample	Number of samples
Secondary Crusher	11/02/10	12/09/10	5

BREATHING ZONE SAMPLES BY DEMOLITION PROJECT	1st sample	Last Sample	Number of samples
Secondary Crusher	10/25/10	12/30/10	60

GENERAL AIR SAMPLES BY DEMOLITION PROJECT	MAX % DAC sample	AVG % DAC for project
Secondary Crusher	4.1	1.2

BREATHING ZONE SAMPLES BY DEMOLITION PROJECT	MAX DAC HR sample	AVG DAC HRS for project
Secondary Crusher	0.4	0.2

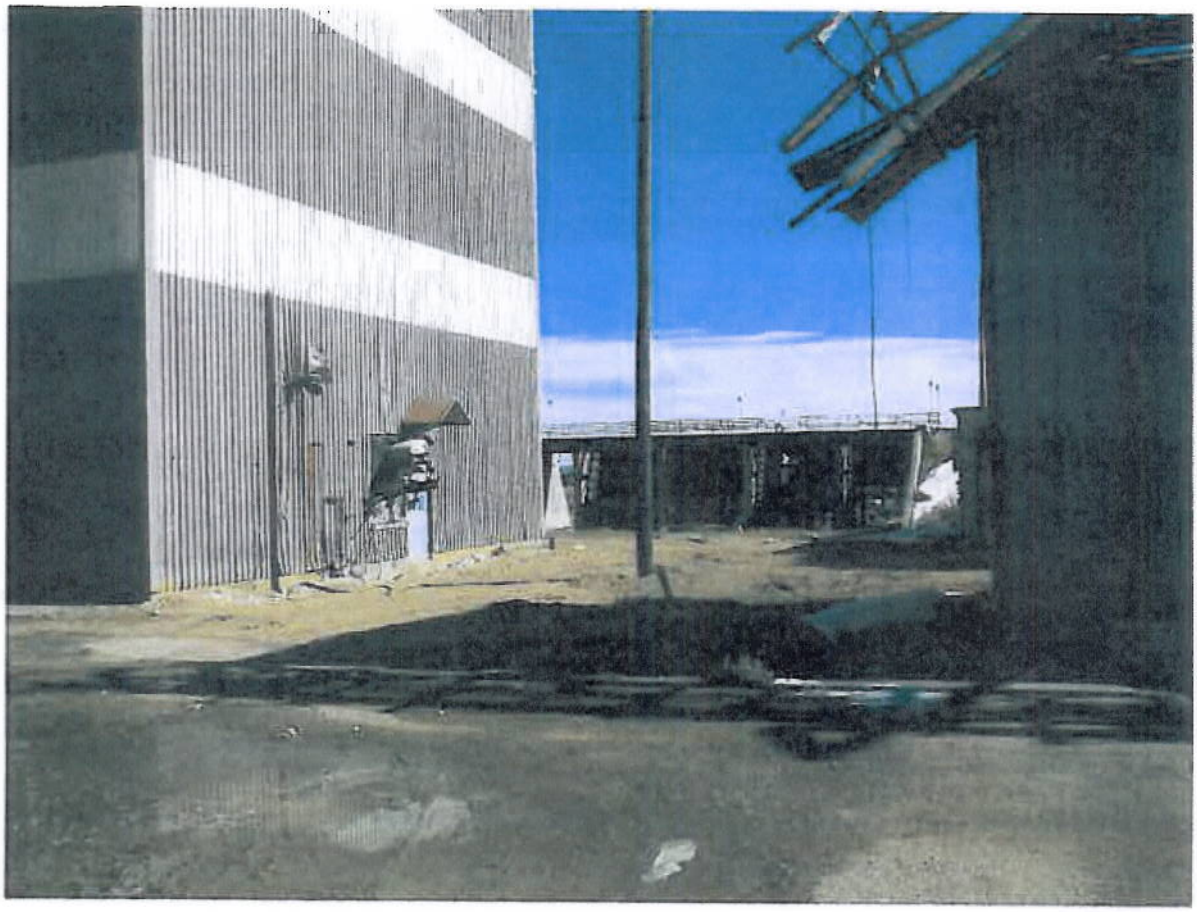
6. The AIRS 71 permit, environmental monitoring data, personnel exposure data, dust condition reports and the constructed materials volume calculations associated with this report will be archived in the decommissioning records area with a copy of this report.

Page 5, 6 and 7 are pre and post demolition views of the Secondary Crusher baghouse and conveyor with pages 8 and 9 show pre and post demolition views of the Secondary Crusher feed baghouses and grizzly.

PRE-DEMOLITION SECONDARY BAGHOUSE

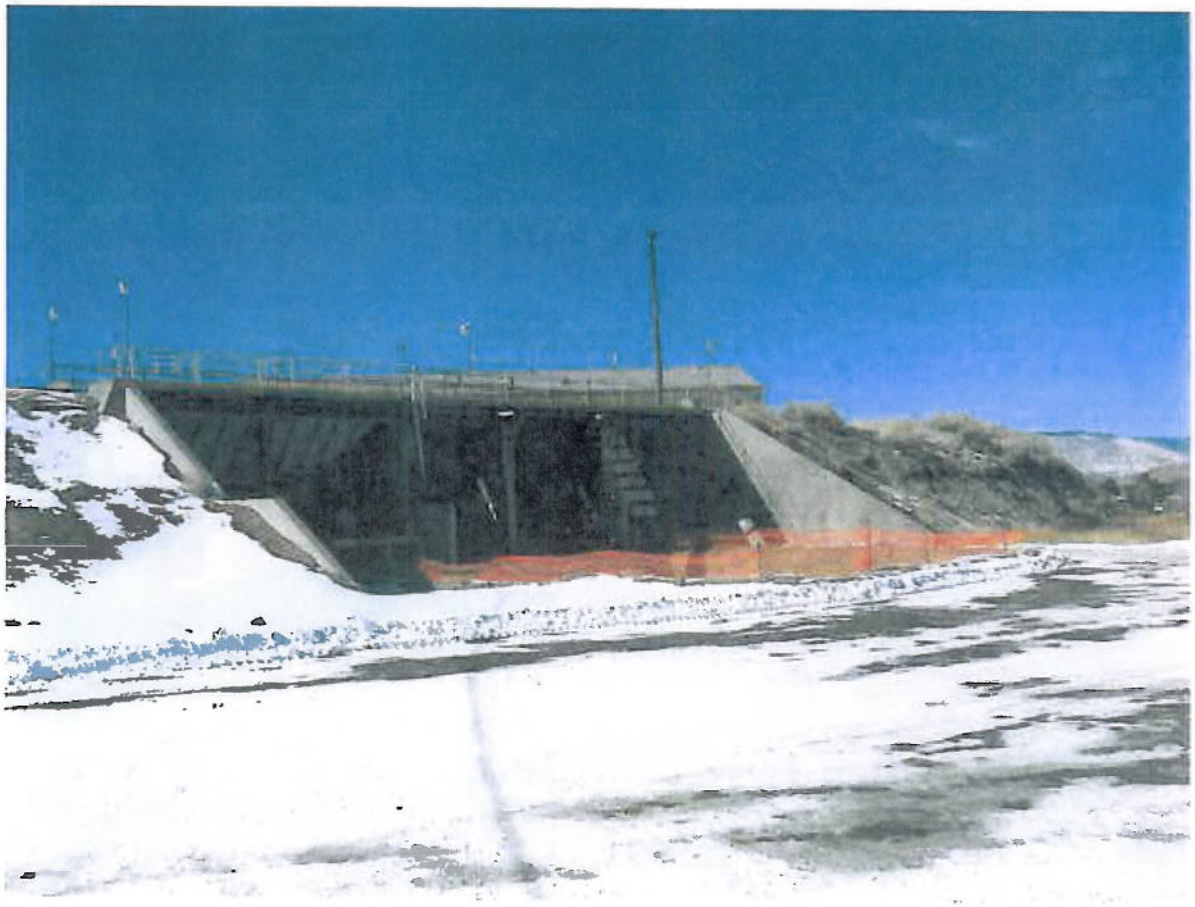
POST DEMOLITION SECONDARY BAGHOUSE

POST DEMOLITION SECONDARY CONVEYOR



PRE DEMOLITION SECONDARY FEED BAGHOUSES AND GRIZZLY

POST DEMOLITION SECONDARY CRUSHER BAGHOUSES AND GRIZZLY



#7 Grind Leach Conveyor Demolition Report

Surety Offset Requested: Unburdened $64,755.97 Burdened $116,399

Full surety reduction was not requested because the caustic tank outside of the Fine Ore Bins has not been removed.

This report summarizes the Mill Facility Removal demolition of the FOB conveyor to grind, Primary Thickener, Primary Thickener bridge and drive, Reactor Clarifier (RCL) bridge and drive, Reactor Clarifier wood tank. Neutralization Circuit(neutralization tanks (3) and foundations, pump sheds, #10 clarifier/neutralization, foundations, bridge, misc. tanks). These demolition activities commenced in August 2010 and were completed by mid-December 2010 and were completed in accordance with all applicable legal and regulatory requirements. The project goals of safe work and using the ALARA philosophy to minimize dose to workers and the public were achieved.

1. History - These sections of the milling facility were constructed in the late 1970's as part of the milling facility that commenced operation in 1979. The 1979 milling facility was constructed to the West of the original 1957 milling facility.

2. Pre-demolition activities – A certified Asbestos Building Inspector inspected/performed sampling in the facilities described above, provided instructions for removal and disposition of asbestos materials and provided the documentation required to apply for demolition permits from the Colorado Department of Public Health and Environment Air Pollution Control Division. Four Colorado demolition permits were received and used to obtain Fremont County demolition permits from the Fremont County Building Department.

	Neutralization Circuit	RCL	Primary	CCD Bldg
Colorado Demolition Permit #	10FR2398D	10FR2399D	10FR2400D	10FR2401D
Fremont County Demolition Permit #	D10-021	D10-022	D10-023	D10-020

All soil transport activities were conducted under the Airs 71 sitewide air permit.
All nuclear density gauges were removed from the demolition areas and placed in secure storage prior to starting demolition activities.

Run-in/run-off berms were constructed prior to the commencement of demolition activities. Process lines were emptied at circuit shutdown and during a prior hazard reduction process. Oil was drained and collected from all gearboxes and devices.

Utilities were disconnected prior to demolition activities. There was one occasion where, due to confusion in terminology of area title boundaries, the excavator mounted shear cut

into an active electrical line. This incident was investigated and a new utility disconnect verification signoff sheet with an attached diagram of the area to be signed off was created and has been utilized for all subsequent demolition.

3. Hazardous Work Permit training for the Grind Leach conveyor structure removal was conducted on 12-1-10. Primary Thickener, Reactor Clarifier and Neutralization Circuit demolition work controls were included in the CCD Demolition Work Plan. Radiation, Industrial Safety and project specific training on the CCD Demolition Work Plan was conducted on 5-18-10 for all contractor employees and Cotter personnel involved with the demolition. Ongoing training was provided for new individuals entering the project. .

4. Demolition Activities – The conveyor and other tanks and structures were removed utilizing track mounted excavators equipped with shears, buckets, grappling thumbs and rock breakers to demolish, size and then load the demolition materials into trucks for transport to the disposal area. Wheel mounted loaders and backhoes were also used to load trucks. Water spray was used to control dust. Fire water and mill water systems as well as a water truck with a remote control operated water cannon were utilized for demolition area dust control. Water trucks with spray bars and/or the water cannon were used for dust control on transport areas and laydown areas. The demolition materials were placed in the Primary Impoundment and the majority of the material has been covered with random soil fill. Large pipes or vessels were crushed or filled with soil or sand to minimize void spaces prior to placement.

   The Grind/Leach conveyor and other tanks and structures demolition began on 8-09-10 and was completed on 12-10-10.

   The total constructed volume of the materials removed from these areas was 55,252 ft^3. Soils were removed to a nominal level of 60 uR for ALARA purposes.

   ALARA – Demolition activities were reported on and discussed during daily meetings attended by the RSO and/or the ARSO and The Health and Safety Supervisor. Environmental and occupational monitoring results are evaluated during the monthly ALARA review meeting. Environmental Monitoring at the perimeter site boundaries is part of the routine monitoring program. Since the Old Mill Electric Shop demolition in April 2009 and initiation of interim closure of the Secondary Impoundment in the Third Quarter of 2009 through the 2010 demolition of the Old Mill Office Shop, the CCD Tanks, miscellaneous piperacks, conveyors and baghouses, Environmental air particulate data as judged by weekly dust loading, weekly gross alpha and quarterly composite for individual uranium series radionuclides have demonstrated compliance with standards and results within historical limits for the past 30 years of record. Typical results are that most radionuclides are less than 10% of the standard. For radon, additional measuring stations were added for the Secondary Impoundment project in 3rd quarter 2009 and all monitoring stations have been in compliance with the standards. Data for the fourth quarter 2010 is not yet available. This monitoring information and detailed evaluation is presented in the semiannual effluent report as well as the annual report. The CCD project was similar in nature to the Grind Leach Conveyor project. The occupational and

environmental sampling summary for the Grind Leach Conveyor and CCD projects is shown in the following Table 1, Occupational Results.

Occupational and Environmental Sampling Results

GENERAL AIR SAMPLES BY DEMOLITION PROJECT	1st sample	Last Sample	Number of samples
Grind Leach Conveyor and CCD	04/05/10	12/6/10	260

BREATHING ZONE SAMPLES BY DEMOLITION PROJECT	1st sample	Last Sample	Number of samples
Grind Leach Conveyor and CCD	04/08/10	12/1/10	318

GENERAL AIR SAMPLES BY DEMOLITION PROJECT	MAX % DAC sample	AVG % DAC for project
Grind Leach Conveyor and CCD	7.9	0.9

BREATHING ZONE SAMPLES BY DEMOLITION PROJECT	MAX DAC HR sample	AVG DAC HRS for project
Grind Leach Conveyor and CCD	4.1	0.7

The AIRS 71 permit, the demolition permits, environmental monitoring data, personnel exposure data, dust condition reports and the constructed materials volume calculations associated with this report will be archived in the decommissioning records area with a copy of this report.

Page 5 is a pre-demolition view with page 6 showing a post-demolition view of the Grind Leach Conveyor area.

PRE-DEMOLITION

POST DEMOLITION

#8 Pipe Racks Demolition Report

Surety Offset Requested (88%) Unburdened $127,431.95 Burdened $229,059

This report summarizes the Mill Facility Removal demolition of pipe racks. These demolition activities commenced in late October 2010 and were completed by early December 2010 in accordance with all legal and regulatory requirements. The project goals of safe work and using the ALARA philosophy to minimize dose to workers and the public were achieved.

1. History - These sections of the milling facility were constructed in the late 1970's as part of the milling facility that commenced operation in 1979. The 1979 milling facility was constructed to the West of the original 1957 milling facility.

2. Pre-demolition activities – An asbestos survey conducted in 2001 did not require abatement of asbestos in the components to be demolished.

   All soil transport activities were conducted under the AIRS 71 sitewide air permit.

   Run-in/run-off berms were not required for this project. Process lines were emptied at circuit shutdown and during a prior hazard reduction process. Oil was drained and collected from all gearboxes and devices.

   Utilities were disconnected prior to demolition activities. The utility disconnect verification signoff process was utilized for this demolition project.

3. Radiation, Industrial Safety and project specific training on the Hazardous work Permit for demolition of the pipe racks on 10-25-10 for all contractor employees and Cotter personnel involved with the demolition. Ongoing training was provided for new individuals entering the project.

4. Demolition Activities – The pipe racks were removed utilizing track mounted excavators equipped with shears, buckets, grappling thumbs and rock breakers to demolish, size and then load the demolition materials into trucks for transport to the disposal area. Wheel mounted loaders and backhoes were also used to load trucks. Water spray was used to control dust. Fire water and mill water systems as well as a water truck with a remote control operated water cannon were utilized for demolition area dust control. Water trucks with spray bars and/or the water cannon were used for dust control on transport areas and laydown areas. The demolition materials were placed in the Primary Impoundment and the majority of the material has been covered with random soil fill. Large pipes were crushed or filled with soil or sand to minimize void spaces prior to placement.

   The pipe racks removal project began on 10-26-10 and was completed on 12-08-10.

   The total constructed volume of the materials removed from these areas was 12,160 ft^3.

5. ALARA – Demolition activities were reported on and discussed during daily meetings attended by the RSO and/or the ARSO and The Health and Safety Supervisor. Environmental and occupational monitoring results are evaluated during the monthly ALARA review meeting. Environmental Monitoring at the perimeter site boundaries is part of the routine monitoring program. Since the Old Mill Electric Shop demolition in April 2009 and initiation of interim closure of the Secondary Impoundment in the Third Quarter of 2009 through the 2010 demolition of the Old Mill Office Shop, the CCD Tanks, miscellaneous piperacks, conveyors and baghouses, Environmental air particulate data as judged by weekly dust loading, weekly gross alpha and quarterly composite for individual uranium series radionuclides have demonstrated compliance with standards and results within historical limits for the past 30 years of record. Typical results are that most radionuclides are less than 10% of the standard. For radon, additional measuring stations were added for the Secondary Impoundment project in 3rd quarter 2009 and all monitoring stations have been in compliance with the standards. Data for the fourth quarter 2010 is not yet available. This monitoring information and detailed evaluation is presented in the semiannual effluent report as well as the annual report. An occupational and environmental sampling summary for this demolition project is shown on below.

Occupational and Environmental Sampling Results

GENERAL AIR SAMPLES BY DEMOLITION PROJECT	1st sample	Last Sample	Number of samples
Pipe Racks	10/26/10	12/27/10	35

BREATHING ZONE SAMPLES BY DEMOLITION PROJECT	1st sample	Last Sample	Number of samples
Pipe Racks	10/25/10	12/08/10	33

GENERAL AIR SAMPLES BY DEMOLITION PROJECT	MAX % DAC sample	AVG % DAC- for project
Pipe Racks	4.6	0.4

BREATHING ZONE SAMPLES BY DEMOLITION PROJECT	MAX DAC HR sample	AVG DAC HRS for project
Pipe Racks	0.4	0.2

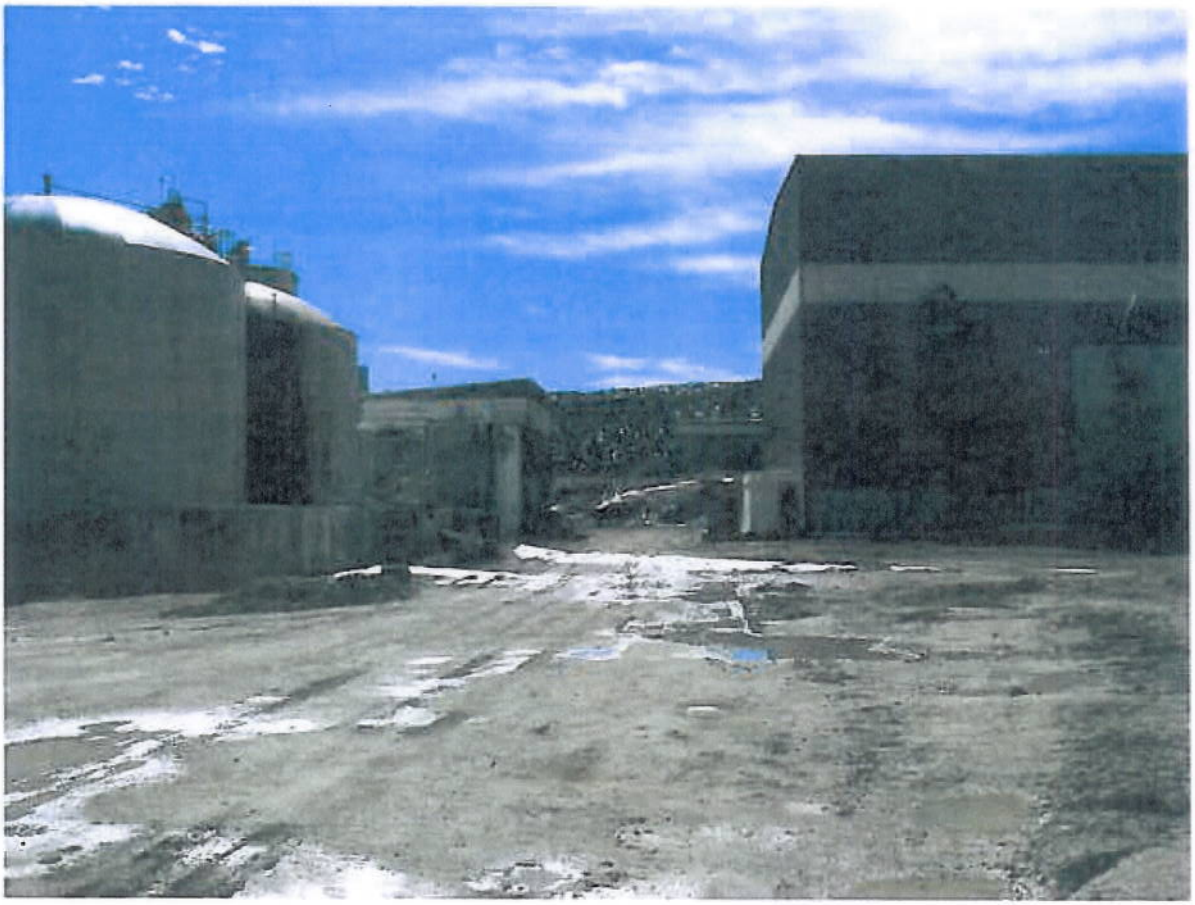
6. The AIRS 71 permit, environmental monitoring data, personnel exposure data, dust condition reports and the constructed materials volume calculations associated with this report will be archived in the decommissioning records area with a copy of this report.

Page 5 is a typical pre demolition view of pipe racks with page 6 showing a typical post demolition view of the Secondary Crusher feed baghouses and grizzly.

PRE-DEMOLITION

TYPICAL VIEW OF PRE-DEMOLITION PIPE RACKS

TYPICAL VIEW OF POST-DEMOLITION PIPE RACKS



#9 Primary Crusher-Day Ore Bin, Conveyor and Baghouse and #10 Schwartz Ore Crusher and Foundations Demolition Report

Surety Offset Requested:

#9 Day Ore Bin:	Unburdened	$14,614.22	Burdened	$26,269
#10 Schwartz Crusher:	Unburdened	$ 6,772.42	Burdened	$12,173
Total		$21,386.64		$38,442

This report summarizes the Mill Facility Removal demolition of the Primary Crusher-Day Ore Bin and Schwartz Ore Crusher Area. These demolition activities were performed from October 2009 through August 2010 in accordance with all legal and regulatory requirements. The project goals of safe work and using the ALARA philosophy to minimize dose to workers and the public were achieved.

1. History - These sections of the milling facility were constructed in 1957.

2. Pre-demolition activities – A certified Asbestos Building Inspector inspected/performed sampling in the facilities described above, provided instructions for removal and disposition of asbestos materials and provided the documentation required to apply for demolition permits from the Colorado Department of Public Health and Environment Air pollution Control Division. One Colorado demolition permits was received and used to obtain a Fremont County demolition permit from the Fremont County Building Department.

	Primary Crusher-Day Ore Bin and Schwartz Ore Crusher Area
Colorado Demolition Permit #	10FR1261D
Fremont County Demolition Permit #	D10-005

All soil transport activities were conducted under the AIRS 71 sitewide air permit.

Run-in/run-off berms were not required for this project. Process lines were not present in this area. Oil was drained and collected from all gearboxes and devices.

Utilities were disconnected prior to demolition activities.

3. Radiation, Industrial Safety and project specific training on RWP 872 for demolition of the Primary Crusher-Day Ore Bin and Schwartz Ore Crusher Area was conducted on 5-6-09 for all contractor employees and Cotter personnel involved with the demolition. Ongoing training was provided for new individuals entering the project.

4. Demolition Activities – The demolition was performed with track mounted excavators equipped with shears, buckets, grappling thumbs and rock breakers to demolish, size and then load the demolition materials into trucks for transport to the disposal area. Wheel mounted loaders and backhoes were also used to load trucks. Water spray was used to control dust. Fire water and mill water systems as well as a water truck with a remote control operated water cannon were utilized for demolition area dust control. Water trucks with spray bars and/or the water cannon were used for dust control on transport areas and laydown areas. The demolition materials were placed in the Primary Impoundment and the majority of the material has been covered with random soil fill. Large pipes or vessels are crushed or filled with soil or sand to minimize void spaces prior to placement.

   The Primary Crusher-Day Ore Bin and Schwartz Ore Crusher Area removal project began on 10-2-09 and was completed on 8-12-10.

   The total constructed volume of the materials removed from these areas was 7,027 ft^3.

5. ALARA – Demolition activities were reported on and discussed during daily meetings attended by the RSO and/or the ARSO and The Health and Safety Supervisor. Environmental and occupational monitoring results are evaluated during the monthly ALARA review meeting. Environmental Monitoring at the perimeter site boundaries is part of the routine monitoring program. Since the Old Mill Electric Shop demolition in April 2009 and initiation of interim closure of the Secondary Impoundment in the Third Quarter of 2009 through the 2010 demolition of the Old Mill Office Shop, the CCD Tanks, miscellaneous piperacks, conveyors and baghouses, Environmental air particulate data as judged by weekly dust loading, weekly gross alpha and quarterly composite for individual uranium series radionuclides have demonstrated compliance with standards and results within historical limits for the past 30 years of record. Typical results are that most radionuclides are less than 10% of the standard. For radon, additional measuring stations were added for the Secondary Impoundment project in 3rd quarter 2009 and all monitoring stations have been in compliance with the standards. Data for the fourth quarter 2010 is not yet available. This monitoring information and detailed evaluation is presented in the semiannual effluent report as well as the annual report. An occupational and environmental sampling summary for this demolition project is shown below.

Occupational and Environmental Sampling Results

GENERAL AIR SAMPLES BY DEMOLITION PROJECT	1st sample	Last Sample	Number of samples
Schwartz crusher and day bin	09/28/09	07/14/10	63

BREATHING ZONE SAMPLES BY DEMOLITION PROJECT	1st sample	Last Sample	Number of samples
Schwartz crusher and day bin	10/02/09	08/12/10	94

GENERAL AIR SAMPLES BY DEMOLITION PROJECT	MAX % DAC sample	AVG % DAC for project
Schwartz crusher and day bin	0.6	0.1

BREATHING ZONE SAMPLES BY DEMOLITION PROJECT	MAX DAC HR sample	AVG DAC HRs for project
Schwartz crusher and day bin	2.5	0.3

6. The AIRS 71 permit, demolition permits, environmental monitoring data, personnel exposure data, dust condition reports and the demolition materials volume calculations associated with this report will be archived in the decommissioning records area with a copy of this report.

Page 5 is a pre demolition view of the Old Primary Crusher-Day Ore Bin and Schwartz Ore Crusher Area with page 6 showing a post demolition view.

PRE-DEMOLITION

POST-DEMOLITION

#11 Old Mill Electric Shop and #12 Old Mill Office Shop Demolition Report

Surety Offset Requested

#11 Electric Shop:	Unburdened $11,689.43	Burdened $21,012
#12 Mill Office:	Unburdened $14,895.88	Burdened $26,775
Total	$26,585.31	$47,787

This report summarizes the Mill Facility Removal demolition of the Old Mill Office and Electric shops. These demolition activities were performed in April 2009 in accordance with all legal and regulatory requirements. The project goals of safe work and using the ALARA philosophy to minimize dose to workers and the public were achieved.

1. History - These sections of the milling facility were constructed in 1957.

2. Pre-demolition activities – A certified Asbestos Building Inspector inspected/performed sampling in the facilities described above, provided instructions for removal and disposition of asbestos materials and provided the documentation required to apply for demolition permits from the Colorado Department of Public Health and Environment Air pollution Control Division. Two Colorado demolition permits were received and used to obtain a Fremont County demolition permit from the Fremont County Building Department.

	Old Mill Electric Shop	Old Mill Office Shop
Colorado Demolition Permit #	09FR0543D	09FR0542D
Fremont County Demolition Permit #	D09-004	D09-004

All soil transport activities were conducted under the AIRS 71 sitewide air permit.

Run-in/run-off berms were not required for this project. Process lines were not present in this area. Oil draining was not necessary in this area.

Utilities were disconnected prior to demolition activities.

3. Radiation, Industrial Safety and project specific training on the Work Plan for demolition of the Old Mill office and shop was conducted on 3-23-09 for all Cotter personnel involved with the demolition. Ongoing training was provided for new individuals entering the project.

4. Demolition Activities – The Old Mill Office and Electric shops were removed using wheel mounted loaders, backhoes and trucks. Water spray was used to control dust. Fire water and mill water systems as well as a water trucks were utilized for demolition area

dust control. Water trucks with spray bars and were used for dust control on transport areas and laydown areas. The demolition materials were placed in the Primary Impoundment and the majority of the material has been covered with random soil fill.

The Old Mill Office and Electric shops removal project began on 4-1-09 and was completed on 4-9-09.

The total constructed volume of the materials removed from these areas was 213 ft^3.

5. ALARA – Demolition activities were reported on and discussed during daily meetings attended by the RSO and/or the ARSO and The Health and Safety Supervisor. Environmental and occupational monitoring results are evaluated during the monthly ALARA review meeting. Environmental Monitoring at the perimeter site boundaries is part of the routine monitoring program. Since the Old Mill Electric Shop demolition in April 2009 and initiation of interim closure of the Secondary Impoundment in the Third Quarter of 2009 through the 2010 demolition of the Old Mill Office Shop, the CCD Tanks, miscellaneous piperacks, conveyors and baghouses, Environmental air particulate data as judged by weekly dust loading, weekly gross alpha and quarterly composite for individual uranium series radionuclides have demonstrated compliance with standards and results within historical limits for the past 30 years of record. Typical results are that most radionuclides are less than 10% of the standard. For radon, additional measuring stations were added for the Secondary Impoundment project in 3rd quarter 2009 and all monitoring stations have been in compliance with the standards. Data for the fourth quarter 2010 is not yet available. This monitoring information and detailed evaluation is presented in the semiannual effluent report as well as the annual report. An occupational and environmental sampling summary for this demolition project is shown below.

Occupational and Environmental Sampling Results

GENERAL AIR SAMPLES BY DEMOLITION PROJECT	1st sample	Last Sample	Number of samples
Old Mill Buildings	04/01/09	04/14/09	15

BREATHING ZONE SAMPLES BY DEMOLITION PROJECT	1st sample	Last Sample	Number of samples
Old Mill Buildings	04/01/09	04/09/09	7

GENERAL AIR SAMPLES BY DEMOLITION PROJECT	MAX % DAC sample	AVG % DAC for project
Old Mill Buildings	71.2	7.8

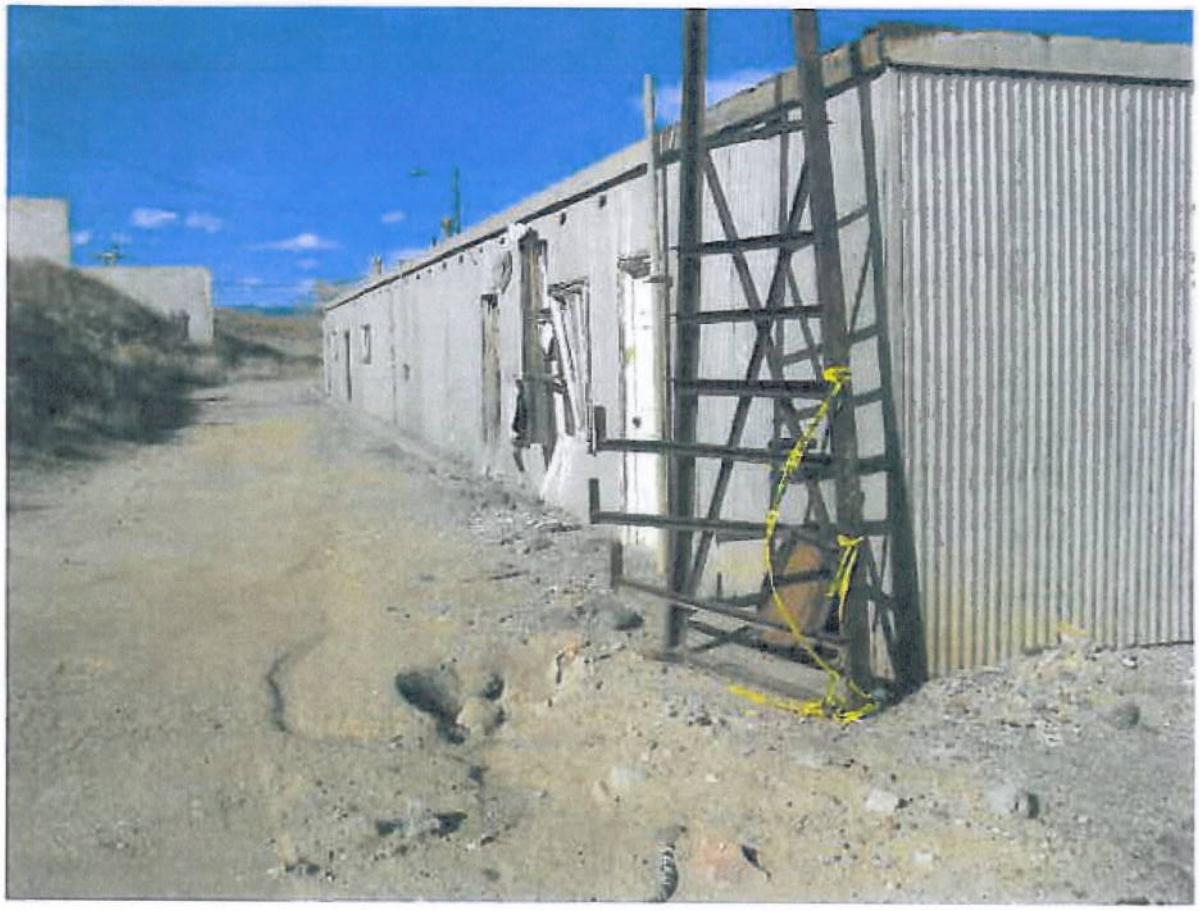
BREATHING ZONE SAMPLES BY DEMOLITION PROJECT	MAX DAC HR sample	AVG DAC HRS for project
Old Mill Buildings	1.8	0.7

6. The AIRS 71 permit, demolition permits, environmental monitoring data, personnel exposure data, dust condition reports and the demolition materials volume calculations associated with this report will be archived in the decommissioning records area with a copy of this report.

Page 5 is a pre demolition view of the Old Mill Office and Electric shops with page 6 showing a post demolition view of the Secondary Crusher feed baghouses and grizzly.

PRE-DEMOLITION

Old Mill Office Shop

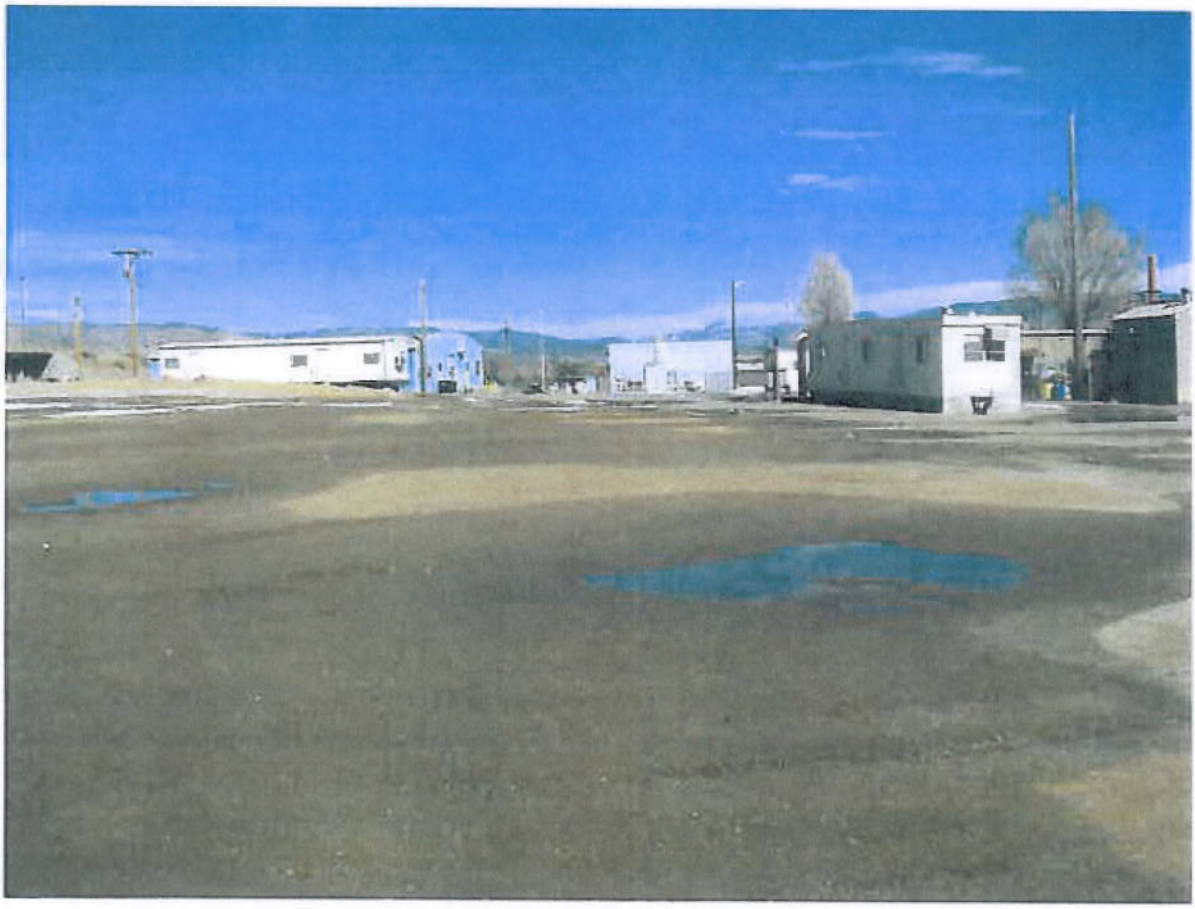


PRE-DEMOLITION

Old Mill Electric Shop

POST-DEMOLITION

Old Mill Office Shop



POST-DEMOLITION

Old Mill Electric Shop