

# STATE OF COLORADO

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Executive Director and Chief Medical Officer

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

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Colorado Department  
of Public Health  
and Environment

**AUG 25 2011**

Mr. Jim Cain:  
Cotter Cañon City Milling Facility  
P. O. Box 1750  
Cañon City, Colorado 81215-1750

RE: 2010 Environmental and Occupational Performance Report, ALARA Review & Annual Report on Remedial Action Plan Activities

Dear Mr. Cain:

A report entitled Calendar Year 2010 Environmental and Occupational Performance Report, ALARA Review & Annual Report on Remedial Action Plan Activities dated July 15, 2011 was received by the Colorado Department of Public Health and Environment (the Department) on July 18, 2011. This report has been reviewed. Comments concerning the report are listed below.

1. In Section 4 the reports on Vegetation and Soil the graphs, such as Figure 4-20 and Figure 4-26, have an excessively large ordinate range (y-axis). The data shown often do not exceed 10% of the ordinate range. This makes the graph not very useful. In future, please plot the data with a meaningful ordinate range.
2. In Section 7 of the report several figures have incorrect labels. Specifically, a figure is labeled as Molybdenum in the title and labeled uranium on the graph (Figures 21 through 32). And vice versa. Please correct.
3. In Section 7 the Primary Impoundment Operational Monitoring report says there is a surveying discrepancy between the standard survey and the GPS survey elevation. Please resolve this discrepancy. Where is the error?

The Department accepts the report data. If you have any questions or would like to set up a meeting, please call Edgar Ethington at (303) 692-3438, me at (303) 692-3371.

Sincerely,

James H. Grice III, Licensing Lead  
Radiation Management Unit  
Hazardous Materials and Waste Management Division

CC Edgar Ethington; CDPHE  
File: Cotter, 369-01; 3.2