



November 14, 2011

Mr. James H Grice III, Licensing Lead  
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: Response to CDPHE Comments on 2010 Annual Report letter dated August 25, 2001

RE: 2010 Environmental and Occupational Performance Report, ALARA Review and Annual Report on Redial Action Plan Activities dated July 15, 2011

Dear Mr. Grice,

Please find our responses to your comments contained in the above mentioned letter.

1. Regarding the ordinate range for Section 4 vegetation and soil graphs, Cotter will reevaluate those displays in relation to background and regulatory guidance in the 2011 annual report.
2. Regarding Section 7, Figures 21 through 32, Cotter has corrected the labels and will submit to all addresses corrected versions.
3. Regarding Section 7, Primary Impoundment surveying discrepancy between the standard survey and the GPS survey elevation, the incorrect Colorado state plane coordinate system zone (south) was used instead of the correct zone (central) for horizontal control. The vertical datum used in the past appears to have been NGVD 29 now plotted using a known location designated as FENCE and using the NAVD 88 resulted in a difference of -3.35 feet. The current plotting properly represents the actual elevation. We will verify this elevation with future survey information.

If you have any questions, please contact me at 719 275 7413 Ext 212 or by email at [jim.cain@cotterusa.com](mailto:jim.cain@cotterusa.com).

Sincerely,

Jim Cain  
Environmental Coordinator/  
Radiation Safety Officer

Cc: Edgar Ethington  
John Hamrick  
Cotter Corporation  
Cañon City Mill, P.O. Box 1750, Cañon City, CO 81215-1750 USA

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