



Road Map  
July 2012

# Lincoln Park Community Update



Colorado Department  
of Public Health  
and Environment



*Providing information on the  
Lincoln Park Cotter Uranium Mill Superfund Site*

**Road Map Public Meeting**  
**You are invited to a public meeting to get more information about how the  
Lincoln Park Cotter Uranium Mill Superfund Site clean-up will proceed.**  
**Thursday July 19, 2012 6:00pm - 8:00pm**  
**The Abbey, 2951 East US Hwy 50 , Canon City**

## The Road Map - Why Do We Need One?

The landscape of how the Lincoln Park Cotter Uranium Mill Superfund Site will be cleaned up changed when the Cotter Corporation decided to terminate their Radioactive Materials License. The License, issued by the Colorado Department of Public Health and Environment, is still in effect and provides conditions for its termination.

Since Cotter will no longer operate under the existing license, access to the entire Cotter property for additional environmental study is now possible. This allows regulators the opportunity to better understand historical contamination on and off Cotter property.

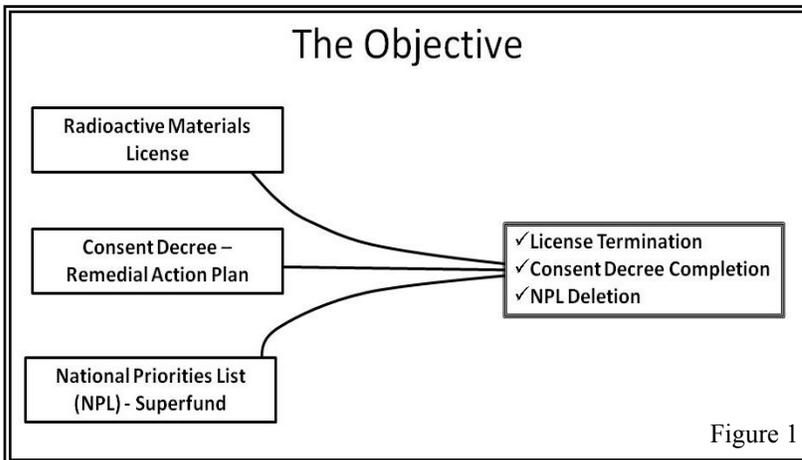
The purpose of the Road Map is to describe the manner in which the State of Colorado (State), the Cotter Corporation (Cotter), and the U.S. Environmental Protection Agency, Region 8 (EPA) will work together to ensure that all cleanup tasks at the Lincoln Park Cotter Uranium Mill Superfund Site meet the requirements of:

- the Consent Decree/Remedial Action Plan (Remedial Action Plan),
- Cotter’s operating license, and
- the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA or Superfund).

## Operable Units

To facilitate a focus on specific areas or problems, the Lincoln Park Cotter Uranium Mill Superfund Site will be organized by Operable Units (OUs). At this time, the State and EPA propose three OUs for the Site:

- OU1: The Cotter Uranium Mill facility and surrounding area, including the Shadow Hills Golf Club,
- OU2: The residential area in Lincoln Park as defined in the 2002 Record of Decision,
- OU3: All other areas where contamination from the Mill came to be located that are not already included in OU1 or OU2.



## Remedial Action Plan Legacy Report

A lot of work has been done as regulations changed over the years, and as conditions on and off Cotter property were studied and understood more. The work has been done as part of the License, Consent Decree/ Remedial Action Plan or Superfund. The Legacy Report will chronicle all work that has been done at the site so far.

### Here are examples of work that has been done:

- **Soil removal and providing residents with municipal drinking water hookups**

This work was done under the Remedial Action Plan and partially under Superfund, with a stipulation in the Remedial Action Plan to monitor the uranium and molybdenum concentrations as they naturally decrease. Ground water contamination in the area continues to be studied because concentrations in some areas are not decreasing as expected. When a remedy is proposed, it will be reviewed by the regulators and public before implementing it and then monitored to determine effectiveness. Cotter continues to evaluate well use every five years with a Well Use Survey.

- **Demolition of most of the Cotter buildings and placement in the Primary Impoundment**

This work is being done under the Radioactive Materials License, as will closing the Impoundment by drying out its contents and engineering a state of the art cap.

- **Cut Off Wall and Pump Back System at the SCS Dam**

The Cut Off Wall intercepts most contaminated ground water from leaving Cotter property, and the pump back system pumps the ground water uphill to the Primary Impoundment for evaporation. The Soil Conservation Service (SCS) Dam was constructed after flooding in the 1960s carried surface water and soils from Cotter property to Lincoln Park.

This work was constructed and is maintained and monitored as an **Interim Measure**, and implemented under the Remedial Action Plan and License. An interim measure is implemented when a final remedy has not been designed and fully reviewed by the regulators and public, but must be put in place to protect public health and the environment in the near term.

As information is compiled the operable unit designations may need to be modified. Many investigations, studies and interim response actions have been completed since the Site was listed on the NPL. To facilitate an accurate accounting of all work that has been completed on the site, a Consent Decree/Remedial Action Plan Legacy Report will be used by the State, Cotter and EPA evaluate what work still needs to be done.

The State, Cotter and EPA agree that the final response actions at the Site must accomplish four main objectives (see Figure 1):

- Protect human health and the environment.
- Allow for termination of the Colorado Radioactive Materials License after successful completion of all necessary activities and transfer of a portion of the property to the U.S. Department of Energy's Legacy Management program for long-term surveillance under a U.S. Nuclear Regulatory Commission license;
- Successfully complete all activities required under the Remedial Action Plan and, ultimately, termination of the Consent Decree; and
- Successfully complete all necessary activities required under Superfund and in accordance with the associated regulations, so that the EPA can delete the Site from the National Priorities List (NPL).

To achieve these objectives, the State, Cotter and EPA must demonstrate that all investigations and response actions are consistent with License termination, Consent Decree termination and Superfund requirements.

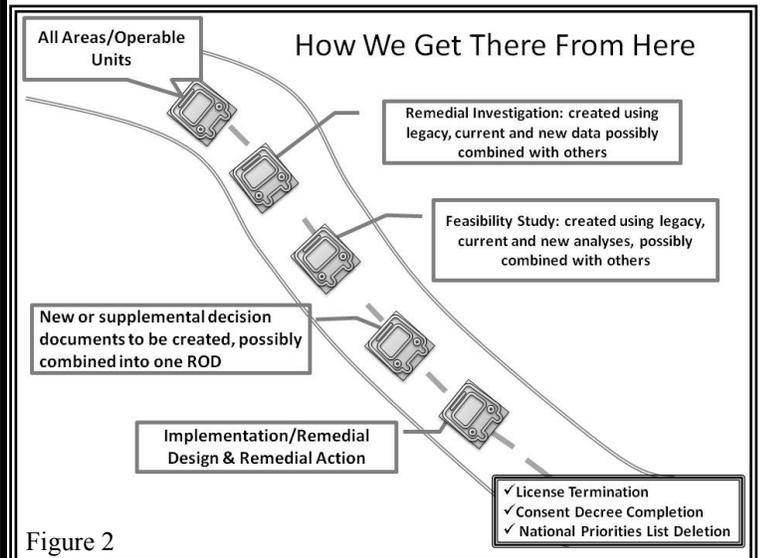


Figure 2

(Continued from page 2)

### **Conceptual Site Model**

A conceptual site model is used to: 1) develop a general understanding of the Site to evaluate potential risks to human health and the environment and, 2) assist in identifying and setting priorities for the activities to be conducted at the Site. (see Figure 2)

The model includes the Remedial Action Plan Legacy Report and information collected in other investigations. It will be used to evaluate the completeness of site characterization in each of the OUs.

1. If site characterization is lacking, the State, Cotter and EPA will collaborate on the development of additional studies to fill data gaps.
2. If site characterization is determined to be complete, a feasibility study will be completed including an analysis of remedial alternatives and Applicable or Relevant and Appropriate Requirements (ARARs).
3. Once the feasibility study requirements are met, the State and EPA will select a remedy after obtaining public comment and document the selected remedy in a decision document for each OU.

### **Public Involvement and Participation**

As development of the conceptual site model proceeds, and study of the contamination on and off Cotter property evolves there will be numerous opportunities for interactive and comprehensive public involvement. At a minimum, the Superfund public participation process will be followed in the remedy selection process. Every effort will be used to have an effective and inclusive community involvement process throughout the cleanup.

- The agencies have committed to an effective and inclusive community involvement process as investigation, characterization and remedy selection proceeds. Investigation and characterization work is regulated and enforceable under the Radioactive Materials License and Consent Decree.
- After each alternatives analysis and feasibility study is complete, the State and EPA will develop and distribute a proposed plan. A remedy will be selected after a 30-day public comment period and public meeting. The agencies will also develop a Responsiveness Summary to respond to all comments received during the comment period.
- Remedial designs and remedial actions will occur after selected remedies are documented in a decision document. The agencies will offer regular updates and additional input opportunities as remedies are designed and implemented.

Three documents have been prepared in addition to this fact sheet to assist with understanding the Road Map, and to address and document work at the Site:

- Table 1 - a Summary Road Map
- Table 2 – a Detailed Road Map including many of the completed investigations and work, and
- Figure 1 - an Aerial Figure of the Site. ◆

**For More Information, Please Visit These Websites:**  
<http://www.cdphe.state.co.us/hm/cotter/index.htm>

**Or**

<http://www.epa.gov/region08/superfund/co/lincolnpark/>

**The Lincoln Park Cotter Uranium Mill Superfund site agency contacts are listed below.**

**The public is invited to provide input about the proposed Road Map and is welcome to contact us for more information about this or any Lincoln Park Cotter Uranium Mill Superfund site topic.**

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