



Environmental Engineering and Consulting
Remediation and Management Services

August 30, 2010

Colorado Department of Public Health and Environment
HMWMD-RP-B2
4300 Cherry Creek Drive South
Denver, CO 80246-1530

Attention: Mr. Mark Rudolph

**RE: Voluntary Cleanup Application for the Valmont Butte Property
Boulder, Colorado**

Dear Mr. Rudolph:

Casey Resources, Inc. (CRI) submits this letter which amends the Voluntary Cleanup Plan Application dated June 15, 2010 to CDPHE on behalf of the City of Boulder for the referenced property. This letter addresses comments made in your August 5, 2010 letter based on your review of the subject application. The comments are provided below in italics with our response to each immediately following.

General Comment No.1

Dust control and monitoring during the construction phase is warranted. Inhalation is the primary exposure pathway.

CRI concurs with this comment. Section 7.2.5 of the VCUP application (Construction Controls) specifically calls for the implementation of "Dust control, including daily site watering as needed to control dust from active work areas and/or the application of surfactants and soil stabilizers in areas that do not have active grading and/or excavation activities." Furthermore, the construction specifications will state that there is a zero visible dust requirement. If dust is observed, the contractor will be directed to cease soil disturbing activities until appropriate measures are taken including the modification of active dust control procedures to eliminate visual dust. Section 7.2.5 also required perimeter site air monitoring to be conducted for particulate matter, lead, and radiological parameter concentrations. The remediation contractor will be responsible for personnel air monitoring as it relates to requirements to comply with OSHA to insure that all workers are in the appropriate level of respiratory protection.

Given this approach and the fact that additional detail will be provided with the design plans and project specifications, no amendment to the VCUP is believed to be warranted for dust control.

7.2.8 Site Drainage Structures

Sediments in the storm water detention areas prior to closure will need to be tested prior to closure of the detention pond.

The VCUP is amended to include confirmation sampling of the storm water retention ponds prior to removing the ponds from service at the conclusion of construction activities. If the soils in the pond areas exceed the action of 800 mg/Kg concentration for lead, soils will be removed



until the action level is met and disposed in the primary tailings pond. A small area on the primary tailings pond will remain open (no cap in place) to accommodate these soils, if needed. Once the detention areas are closed, the final cap will be placed on the open area in the primary tailings pond.

7.6 Post Remediation Operations and Maintenance

- 1. Revegetation criteria need to be set forth and proposed for completion of work.*
- 2. Post Remediation maintenance shall include control of deep rooted vegetation.*

CRI concurs with this comment. Section 7.1 of the VCUP states that "all disturbed areas outside of the tailings pond location will be vegetated once site grading is complete. A site specific seed mix design shall be prepared that combines native grasses with other species intended to provide a formidable root system to promote fast growing protective cover surfaces. Areas with existing vegetative cover will be inspected to ascertain if any additional seeding is required to augment the existing vegetation." The final design of the VCUP remedy is to include a native grass/vegetation design mix consistent with the City of Boulder's open space requirements in areas not capped with rock. The remediation contractor shall be responsible for the continued maintenance of revegetated areas including irrigation of those areas to insure that the vegetation growth is acceptable. Inspections will be conducted in the post construction phase to evaluate the success of the vegetation growth with percentage of coverage of a given area as the criteria for a particular area. If coverage criteria are not met, the area will receive additional soil amendment and vegetation as necessary and continue to be monitored on a regular basis until vegetation criteria are met.

The primary tailings impoundment and potentially some other smaller remediated areas will be capped with two feet of soil and 1.5 feet of rock. Since the rock clad is at the surface, we do not anticipate vegetation growth in these areas. The post remediation maintenance plan will include visual inspection of these areas for vegetation growth, other than shallow root grasses. Should, vegetation such as tree saplings, bushes, or deep rooted weeds be identified, this vegetation will be removed or otherwise controlled.

Please contact me if we need to discuss any of these responses and VCUP modifications. We look forward to your final approval of the VCUP application absent any questions relating to this letter.

Sincerely,
Casey Resources, Inc.

A handwritten signature in blue ink, appearing to read "Paul L. Casey".

Paul L. Casey, P.E.
Principal

Cc: Maureen Rait, P.E., City of Boulder
Joe Castro, P.E., City of Boulder