

April 21, 2006

Mr. Phillip Stoffey
Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division
4300 Cherry Creek Drive South
Denver, CO 80246-1530

Terracon
Consulting Engineers & Scientists

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RE: City of Boulder, Valmont Buttes/Allied Piles Site
Background Arsenic Concentration
Terracon Project No.: 22057004

Dear Mr. Stoffey:

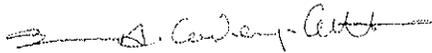
Terracon is providing this letter on behalf of the City of Boulder to request a site-specific arsenic cleanup level of 10 mg/Kg for the subject site.

Terracon and Roe Ecological Services, LLC have conducted recent soil sampling at locations that may be considered "background" (i.e. not obviously impacted by former milling operations) on and off-site, with analysis for arsenic. Results have indicated arsenic concentrations in soil ranging up to 9.4 mg/Kg.

We understand that several sites in Colorado undergoing cleanup where arsenic is a constituent of concern have cleanup levels that range from 12 mg/Kg¹ to 70 mg/Kg². Based on recent telephone conversations between your department, Terracon and City of Boulder personnel, the limited background sampling referenced above, and other sites' cleanup levels, we would like to request that the arsenic background level for the subject site be established at 10 mg/Kg. If this is acceptable, please let us know at your earliest convenience.

If you have any questions, please do not hesitate to call.

Sincerely,
Terracon



Susanne Cordery-Cotter, P.E.
Senior Project Engineer

Cc: Mr. Bill Boyes, City of Boulder

¹ Proposed cleanup level, Colorado School of Mines Creekside Site, Golden, CO, verbal communication with P. Stoffey, CDPHE, March 21, 2006.

² Vasquez Boulevard & Interstate 70 (VB/I-70) Superfund Site, "A New Proposed Cleanup Plan", May 2003, EPA Region VIII.