

Environmental Health and Safety
Colorado School of Mines
Golden, CO 80401-1887
303/273-3316



June 16, 2006

Mr. Phil Stoffey
Environmental Protection Specialist
CDPHE HMWM-RM-B2
4300 Cherry Creek Drive South
Denver, CO 80246-1530

**SUBJECT: RESPONSE TO COMMENTS, FINAL CSMRI SITE
CHARACTERIZATION WORK PLAN, BY S. M. STOLLER
CORPORATION**

Dear Mr. Stoffey:

Colorado School of Mines ("School") appreciates your comments concerning the investigation work currently underway at the CSMRI Site. The following summarizes discussions we had with you and Mr. Ethington June 14 and 15, 2006 regarding your letter of June 6, 2006.

Work Plan Section 2, Mercury - We will proceed with site characterization as presented in the workplan to meet both the mercury compounds standards and the elemental mercury standards. We will add the collection and analysis of a minimum of 10 samples for elemental mercury, however, during the final confirmatory sampling stage of the project.

Isotopic Sensitive Analysis - We appreciate your continuing assistance at trying to keep costs down on this project. We share, of course, the same goal. Based on our discussions, we understand your comment to be based upon the Department's impression, although mistaken impression, that the School was going to perform alpha spec analysis on samples to determine the U and Th isotopic concentrations. The School, however, will use the gamma spec analysis. We agree with the CDPHE that the gamma spec analysis can provide a cost effective analysis for U and Th isotopes. We are glad we spoke to clear up this misunderstanding and we welcome any other comments you may have that will make this investigation more cost effective.

Section 5.2 - We apologize for any confusion we may have caused for using the terminology "background calibration". What we meant to express was that we will perform daily instrument performance checks on low activity soil and known check sources. These performance checks will not be used for recalibration of equipment or redefinition of background.

Grey Zone Determination - We will continue to confer with Edgar Ethington before and during the implementation of the Visual Sampling Plan (VSP) to reduce the grey zone to within acceptable limits. The number of samples analyzed will depend on acceptable VSP implementation.

Stockpile Sampling - From our discussions, your concerns are based solely on the sampling methodology of the resulting stockpiles for disposal characterization purposes. Our revised stockpile sampling will consist of sampling the stockpile periodically, approximately every 500 cubic yards. The sampling will consist of collecting 5 random samples and compositing them

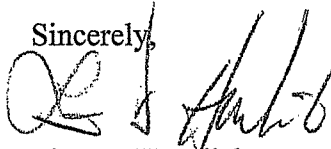


into a single sample. Composite samples will be held until the stockpile is complete, at which time an appropriate number of the samples, selected randomly, will be submitted to the laboratory for analysis. We acknowledge that the CDPHE accepts composite samples for stockpile disposal characterization purposes.

This letter modifies the May 12, 2006 Site Characterization workplan, consistent with your June 6, 2006 letter and our discussions during the last two days. If there is anything in this letter that is not correct, please contact me immediately. Otherwise, we will continue with Site investigation and characterization as outlined herein and the workplan.

Feel free to contact myself, Steve Brinkman, or Joseph Gordon, with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Linn D. Havelick". The signature is written in a cursive style with a large initial "L".

Linn D. Havelick