

CORRES CONTROL
INCOMING LTR NO

01125 RF03

DUE DATE

ACTION

RECEIVED

2003 DEC 29 P 2 37 STATE OF COLORADO

Bill Owens, Governor
Douglas H Benevento Executive Director

CORRESPONDENCE
CONTROL

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr S
Denver, Colorado 80246-1530
Phone (303) 692-2000
TDD Line (303) 691-7700
Located in Glendale, Colorado

Laboratory and Radiation Services Division
8100 Lowry Blvd
Denver, Colorado 80230-6928
(303) 692-3090



Colorado Department
of Public Health
and Environment

DIST	LTR	ENC
BERARDINI J H	X	X
BOGNAR E S	X	X
BROOKS L	X	X
BUTLER L	X	X
CARPENTER M	X	X
CROCKETT G A	X	X
DECK, C A	X	X
DEGENHART, K R		
DIETER, T J		
DIETERLE, S E		
FERRERA, D W	X	X
GIACOMINI J J		
LINDSAY, D C	X	X
LONG, J W		
LYLE J L		
MARTINEZ, L A	X	X
NAGEL R E	X	X
NESTA, S		
NORTH, K	X	X
PARKER, A M	X	X
RODGERS, A D		
SHELTON D C	X	X
SPEARS, M S		
TRICE, K D		
TUOR N R	X	X
WIEMELT, K		
WILLIAMS I L		
ZAHM C	X	X

http://www.cdphe.state.co.us

December 22, 2003

Mr Joseph Legare
Assistant Manager for Environment and Stewardship
U S Department of Energy
Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, Colorado 80403-8200

RE: Approval, Draft Industrial Area Sampling and Analysis Plan, FY04 Addendum #IA-04-02, IHSS Group 700-2 (UBC 707 & 731), November 2003

Dear Mr Legare

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) hereby grants approval for the subject document. A comment resolution meeting on December 18, 2003 was successful in resolving the Division's written comments on the initial document. Those comments are attached for reference.

As discussed during the meeting, the investigation is not scheduled until late 2004. As a result, the parties recognize that changes to the investigation may arise and revisions to the document may be warranted.

We look forward to verifying the final, revised document. If you have any questions regarding this correspondence, please contact me at (303) 692-3367, Harlen Ainscough at 303-692-3337 or David Kruchek at 303-693-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

Attachment

cc Mark Aguilar, EPA
Norma Castaneda, DOE
Lane Butler, KH
Administrative Records Building T130G

Mark Sattelberg, U S F&W
Dave Shelton, KH
Edd Kray, CDPHE



COR CONTROL	X	X
ADMIN RECORD	X	X
PATS/130	X	X

Reviewed for Addressee
Corres Control RFP

12/29/03
Date By

Ref Ltr #

DOE ORDER #

5100.1

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

UBC700-2 IHSS Group SAP Addendum (#IA-04 05) UBC 707 & 731 Approval doc

ADMIN RECORD

IA-A-001900

Colorado Department of Public Health and Environment

Hazardous Materials & Waste Management Division

Comments

Draft Industrial Area

Sampling and Analysis Plan

FY04Addendum #IA-04-02

IHSS Group 700-2

(UBCs 707 and 731)

November 2003

Specific Comments

1. Section 1 0 In the next to last sentence, the reference to Tank 12 should be changed to Tank 30
2. Table 1 PCBs will need to be added as a constituent for Building 707 A large quantity of soil was excavated from the east side of Building 707 (re IHSS 700-1103) because of a PCB release on the roof The potential exists for soil beneath the east-central edge of the building to have become, and to remain, PCB contaminated
3. Section 2.0, last para , page 1 The occurrences of contamination outside Building 707 should be qualified as, or potentially, coincidental to the activities that occurred in the building Additionally, the PCB contamination, whether considered part of the Group 700-2 data, should be noted
4. Section 3 0 The second paragraph notes that roof drain outfalls provide a basis for biased samples Please indicate if these were intended to address radionuclide, and potentially beryllium contamination, associated with the Building 776/777 fire, the PCB release, or both. Although the previous PCB remediation work focused on the outfalls on the east-central side of Building 707, was the roof sloped such that PCBs could have reached the soils from other down spouts? If so, samples from those locations should be analyzed for PCBs
5. Figure 3. The cluster of sample locations at the east-central exterior of Building 707 appear to be investigation, or confirmation, samples related to a PCB release and soil removal (IHSS700-1103) Please evaluate that data to determine suitable locations inside the building to determine whether soils beneath the building were also affected by the release
6. Figure 4. Please identify the various Modules that exist(ed) in the building The IASAP, Appendix C, identifies Module G as a location where beryllium parts were disassembled and recycled or processed for disposal without the use of gloveboxes Please propose biased sampling sites, as appropriate, if floor joints, cracks, or other building features existed at the Module G location
7. If building features that may warrant biased sample locations have not been identified, to the extent possible, please add them to Figure 4 for further consideration of the Division (Please anticipate where the Division may request additional biased samples and include them in the revision to this addendum)
8. Table 3 Sample locations, CE42-000, CE42-001, CE43-005, CE 44-013, CF-43-000, CF43-001, CF44-014, CG44-008 and CG44-009 are not shown on Figure 4 They are associated with either OPWL Line P-14 or P-15 either west, northwest, north, or northeast of the building The accompanying notification, FY04 Notification #04-05, states in Section 2 2 that these OPWLs will be included in the sampling effort Please address by including them on Figure 4 and discussing them in Section 3 0 The Division will subsequently determine whether the locations are sufficient to address the OPWL lines Table 2 may need to be updated as result, please check.

- 9 The Division is aware that Building 707 sits atop a bedrock high but expects construction fill to be present. The first interval, 00, should begin beneath the construction fill unless the material is fine-grained, recoverable in the core sleeve, and would be capable of entraining constituents released from the building. Please address in the narrative or a footnote to the table.
 - 10 Statistical sample CF42-001 is adjacent to biased sample CF43-014, Figure 4, with the same intervals and constituents to be evaluated. Consideration may be given to eliminating CF42-001.
 - 11 Please move statistical sample CF42-002 eastward where the OPWL pipe begins and extend the boring below the line.
 - 12 Extend statistical samples CF42-003 and CF42-004 deeper, if necessary, to check for contamination along the OPWL pipe.
 - 13 Statistical sample CF43-007 is to be located near biased sample CF43-013. Consideration may be given to eliminating CF43-007.
 - 14 Please move statistical sample CG42-000 southward to the OPWL pipe, then 15-20 feet westward along the line, and extend the boring below the line. Moving westward is suggested to distance the boring from CG42-012.
 - 15 Please move statistical sample CF42-002 northward where the OPWL pipe begins and extend the boring below the line.
 - 16 Biased samples CG42-003 and CG43-019 are proposed where extensive soil removal was conducted relative to PCB contamination. As a result, their values are doubtful at those locations. Consideration should be given to locating them inside the building to determine whether the PCB contamination spread beneath the building. Other constituents should still be evaluated.
 - 17 Biased sample CG44-005 is not shown on Figure 4. The coordinates place the boring at the northeast corner of Building 707. Since there are no other Building 707 borings planned for that immediate area, it appears to be appropriate to include it in the addendum and, thus, on Figure 4. Please note, the Easting indicates that the boring may not be located near enough to the OPWL line. Please address each aspect of the comment.
-