

CORRES. CONTROL  
INCOMING LTR NO

00294 RF 04

RECEIVED

2004 JUL 14 A 10: STATE OF COLORADO

DUE DATE  
ACTION

Bill Owens, Governor  
Douglas H. Benevento, Executive Director  
Dedicated to protecting and improving the health and environment of the people of Colorado

CORRESPONDENCE  
CONTROL



Colorado Department  
of Public Health  
and Environment

4300 Cherry Creek Dr. S. Laboratory and Radiation Services Division  
Denver, Colorado 80246-1530 8100 Lowry Blvd.  
Phone (303) 692-2000 Denver, Colorado 80230-6928  
TDD Line (303) 691-7700 (303) 692-3090  
Located in Glendale, Colorado  
<http://www.cdphe.state.co.us>

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.		
DECK, C. A.	X	X
DEGENHART, K. R.		
DIETER, T. J.		
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
RODGERS, A. D.		
SHELTON, D. C.	X	X
SPEARS, M. S.	X	X
PIZZUTO, V. M.		
OBIN, M.		
TUOR, N. R.	X	X
WEMELT, K.		
WILLIAMS, J. L.		
ZAHM, C.	X	X

July 9, 2004

Mr. Joseph Legare  
Director, Project Management Division  
U.S. Department of Energy  
Rocky Flats Field Office  
10808 Highway 93, Unit A  
Golden, Colorado 80403-8200

RE: Approval: No Further Accelerated Action (NFAA), PAC 000-190, Caustic Leak

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) hereby grants NFAA approval for the subject unit.

Our comments, attached, on the draft Historical Release Report (HRR) description of the unit have been satisfactorily addressed in the July 6, 2004 revision.

In resolving the comments, an advanced verbal contact with the Division would likely have made comment resolution easier. The site has agreed to make initial informal contacts in the future.

If you have any questions regarding this correspondence, please contact me at (303) 692-3367 or Harlen Ainscough at 303-692-3337.

Sincerely,

Steven H. Gunderson  
RFCA Project Coordinator

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

Attachment

Reviewed Rr Addressee  
Corres Control RFP

7/14/04  
Date By

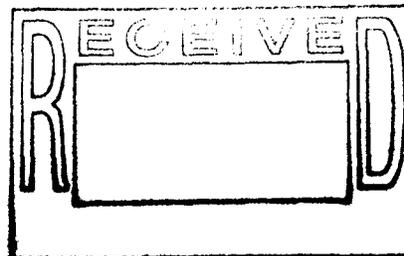
cc: Mark Aguilar, EPA  
Norma Castaneda, DOE  
Lane Butler, KH

Mark Sattelberg, U.S.F&W  
Dave Shelton, KH  
Administrative Records Building T130G

ref. Ltr. #

JOE ORDER #

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ADMIN RECORD

IA-A-002207

Colorado Department of Public Health and Environment

Hazardous Materials & Waste Management Division

Comments

**No Further Accelerated Action Justification for Caustic Leak**

PAC Reference Number: **000-190**

June 1, 2004

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General Comments:

1. ~~Most~~ of the text and supporting data is not pertinent to this **IHSS**. Data related to overlapping **MSSs** should be dealt with in separate decisions. If all the exceedences at **SW22** cannot be accounted for by the sources in **those IHSSs**, then those exceedences at that POE should drive additional evaluation.
2. The **NFAA** justification should be straightforward and simple.
  - The main incident which lead to this **IHSS** occurred over **25** years ago. The acid release was adequately controlled and neutralized. Any remaining acid has long since been naturally neutralized.
  - Within the **IHSS**, concentrations of **NaOH** in surface soil are well below **WRW ALs**.
  - Concentrations of **NaOH** in the subsurface pass the Subsurface Soil Risk Screen.
3. Subsurface Soil Risk Screen #5 is not addressed. The standard statement deferring an ecological evaluation to the **CRA** should be included.

Specific Comments:

4. Fate of Constituents Released to Environment: The "constituent" released to the environment was caustic **NaOH** not other constituents. Please focus on the **NaOH**, the steps to neutralize it and the passage of time relative to residual **NaOH**.
5. Proposed Revision of the **IHSS** Boundary: The status of the bullet items are dated. For example, **IHSS** Group 600-5 has been investigated and has received an **NFAA**. Please update.
6. The Division will not approve the partitioning of this **IHSS**. The Division can grant **NFAA** status to the entire **IHSS** without such approval affecting the status of the overlapping sites. The caustic releases were connected from the point of origin to **B-1** and a disjointed boundary is inconsistent with the nature of the release. Please remove the proposed change from the document.
7. Characterization Summary: In the first bullet, **COCs** in overlapping **IHSSs**, although unrelated to the release of caustic, have been used to show the expected levels in adjoining portions of the **IHSS**. This is misleading and unnecessary. Please see Comment No. 3.
8. Screen 1: The "several organics and radionuclide concentrations" are cited as the basis for a "Yes" response despite the fact that these **COCs** are not pertinent to the release. The only **COC**, as noted in "Physical/Chemical Description of Constituent Released" was "concentrated sodium hydroxide". Please make the response "No" then clarify that while the other constituents were found, the true **COC** is **NaOH**.
9. Screen 4: Please factor in the proposed reconfiguration of Central Ditch relative to the concentrated point source of the **NaOH**.
10. In the first paragraph, page 5, the organic, metals and radionuclides should be considered in the context of the **CRA**. Please add language to that effect.
11. **NFAA** Summary: The proximity or congruency of other **MSSs** does not provide justification for partitioning the **IHSS**. Please revise.
12. Subsurface Soil Risk Screen #5 is not addressed. The standard statement deferring an ecological valuation to the **CRA** should be included.

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