

Roy Romer, Governor
Patricia A. Nolan, MD, MPH, Executive Director

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

4300 Cherry Creek Dr. S.
Denver, Colorado 80222-1530
Phone (303) 692-2000

Laboratory Building
4210 E. 11th Avenue
Denver, Colorado 80220-3716
(303) 691-4700



Colorado Department
of Public Health
and Environment

July 7, 1994

Mr. Steve Slaten
U.S. Department of Energy
Rocky Flats Office, Bldg 116
P.O. Box 928
Golden, Colorado 80402-0928

RE: Final OU-1 Sampling and Analysis Plan - Hot Spot Removal, June 1994

Dear Mr. Slaten,

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document submitted by DOE and prime operating contractor, EG&G. The Division's comments are attached.

The Division generally agrees that the proposed radionuclide hot spot removal action is necessary and appropriate. However, the Division does not believe that the Sampling and Analysis Plan provides enough information to support approval of the removal action. The Division recommends the DOE prepare a Proposed Action Memorandum (PAM) and follow the Accelerated Response Actions administrative process described in the proposed amendment to paragraph I.B.10 of Attachment 2 to the Interagency Agreement (IAG). This language was developed by a working group of Division, DOE, and EPA representatives and has been proposed by DOE as an amendment to the IAG (94-DOE-07111).

Although this process has not been formally approved by the Division or the EPA, the Division believes all parties are in agreement that it is an acceptable administrative process. Therefore, until formally approved, DOE should consider the working group language as guidance when pursuing accelerated actions. To that end, the Division recommends DOE staff work closely with the Division and EPA staff to ensure the expeditious development of an approvable PAM for the hot spot removals.

If you have any questions regarding these matters, please call Jeff Swanson of my staff at 692-3416.

Sincerely,

Joe Schieffelin
Rocky Flats IAG Unit Leader
Facilities Section
Hazardous Waste Control Program

cc: Martin Hestmark, EPA
Scott Grace, DOE
Tim Reeves, DOE
Zeke Houke, EG&G
Becky Hinsch, EG&G
Jackie Berardini, CDH-OE
Laura Perrault, AGO

ADMIN RECORD

A-DU01-000689

Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division

Final OU-1 Sampling and Analysis Plan, Hot Spot Removal, June 1994

Comments

COMMENTS

Date of Original Detection of Hot Spots - The first paragraph of the introduction states that elevated concentrations of radiological contamination were first detected during a routine radiological survey in November 1991. This date is not consistent with the Final Phase III RFI/RI report, which states that the hot spot was first detected in August 1992.

Excavation Method - The Division was informed by EG&G staff during a briefing when the Sampling and Analysis Plan was hand delivered that excavation would be conducted using a backhoe to loosen the soil and a hand shovel to remove and containerize the soil. This is not consistent with the text, which states that simple hand tools will be used. The Division does not consider a backhoe a simple hand tool. The range of potential methods of soil hot spot excavation and corresponding dust control measures must be clearly identified in the PAM.

Dust Control - With regard to appropriate dust control measures, the Division expects DOE to follow the approved Final Plan for Prevention of Contaminant Dispersion (PPCD) in scoping dust control measures. Specific dust control measures to be implemented during the excavation must be included in the PAM.

Field Survey Instruments - The instruments used for determining when contamination has reached background levels during the excavation and the method for estimating background levels must be specified in the PAM. Also, the Division recommends that minimum detectable activity levels of the field screening instruments be discussed in the PAM.

Confirmation Sample Locations - The Division recommends DOE consider replacing the simple random sampling scheme with a stratified random sampling scheme that can insure that samples are collected randomly from the rim, side and bottom regions of the excavation.

Excavated Material Hazardous Waste Characterization - Based on the limited information presented in this plan, the Division believes that the sampling and analysis proposed for excavated material hazardous waste characterization is over scoped. The Division recommends DOE staff review the requirements for characterizing excavated soils and eliminate unnecessary or redundant analysis. The Division staff will work closely with DOE to ensure that waste characterization is conducted efficiently.

EPA Decision Error Feasibility Trials (DEFT) software - The basis and rationale for selection of the number of samples to collect should be documented in the PAM. The title of the computer program that DOE utilized in calculating the number of samples is irrelevant. A number of assumptions and site specific parameters are necessary to estimate the number of verification samples needed. The Division has not reviewed the applicability of the DEFT software nor approved its use.