

CORRES. CONTROL
INCOMING LTR NO:

STATE OF COLORADO

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DIST.	LTR	ENC
BENEDETTI, R.L.	X	
BENJAMIN, A.		
BERMAN, H.S.		
CARNIVAL, G.J.		
CORDOVA, R.C.		
CROUCHER, D.W.		
DAVIS, J.G.		
FERRERA, D.W.		
HANNI, B.J.		
HEALY, T.J.		
HEDAHL, T.G.		
HILBIG, J.G.		
IDEKER, E.H.		
KIRBY, W.A.		
KUESTER, A.W.		
LEE, E.M.		
MANN, H.P.		
MARX, G.E.		
McKENNA, F.G.		
MORGAN, R.V.		
PIZZUTO, V.M.		
POTTER, G.L.		
RILEY, J.H.		
SANDLIN, N.B.		
SATTERWHITE, D.G.		
SCHUBERT, A.L.		
SETLOCK, G.H.		
SHEPLER, R. L.		
SULLIVAN, M.T.		
SWANSON, E.R.		
WILKINSON, R.B.		
WILSON, J.M.		
ZANE, J.O.		

MAST EX

Buddy m X

Taylor K X
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CORRES CONTROL	x	x
TRAFFIC		

Reviewed for Addressee
Corres. Control BFP

2-16-93
DATE BY

Ref Ltr. #

COLORADO DEPARTMENT OF HEALTH

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

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Roy Romer
Governor

Patricia A. Nolan, MD, M
Executive Director

EG&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

February 5, 1993

Mr. Martin Hestmark
U.S. Environmental Protection Agency
Region VIII
999 18th Street, Suite 500, 8WM-C
Denver, Colorado 80202-2405

RE: Technical Memorandum (TM) 6: CPT and BAT Sampling Plan for the Original Landfill, OU 5, January, 1993

Dear Mr. Hestmark,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document prepared by DOE and prime operating contractor, EG&G. We recommend that this TM be given conditional approval subject to the comments included below.

The Division's comments to TM 6 are as follows:

1) The Division is concerned about the recommended change from the approved RFI/RI Workplan for OU 5 regarding the increased spacing for the CPT surveys from 100 ft to 150 ft centers. We do not agree that this would have little expected effect on survey results, particularly since the emphasis on the Phase I RFI/RI for IHSS 115 is to characterize completely the downgradient limits of the Landfill. To that end, we would accept 150 ft spacing on the following condition: a commitment is placed in this TM to decrease the CPT/BAT spacing to 50 ft over any anomaly established by the downgradient "net" of closely spaced soil gas survey points and/or between or around any 150 ft-spaced survey points for which BAT sample analysis reveals contamination above background levels.

2) In light of the possibility that the above comment may expand the requirements set forth in the Workplan, we question the value added by the line of CPT surveys upgradient of the SID. This was not a requirement of the agencies for Workplan approval, but was an addition by DOE and EG&G which the agencies had no reason to

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question. Therefore, removal of the northern survey line from this investigation is an item we are willing to discuss.

3) The Division does not agree with the prioritization of sample analysis presented on page 22. Specifically, we would prioritize the samples as follows:

1. HSL VOCs
2. U-233, 234, 235, 238
3. Am-241 and Pu
4. Field parameters
5. TAL metals
6. BNA
7. PCBs
8. Gross alpha/beta

The remaining tests could follow in the order remaining on page 22.

If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 692-3356.

Sincerely,



Gary W. Baughman, Chief
Facilities Section
Hazardous Waste Control Program

cc: Richard Schassburger, DOE
Jen Pepe, DOE
Ed Mast, EG&G
Jackie Berardini, CDH-OE