

COLORADO DEPARTMENT OF HEALTH

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

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Roy Romer
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 Executive Director

May 17, 1994

Mr. Richard J. Schassburger
 U.S. Department of Energy
 Rocky Flats Office, Building 116
 P.O. Box 928
 Golden, Colorado 80402-0928

RE: Potential Chemical-Specific Benchmark Tables

Dear Mr. Schassburger,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the January 25, 1994 revision of the Sitewide Benchmark Tables. They are presented as Tables B-30 through B-33 of the March 1994 Annual Report for the FY 1993 Treatability Studies Program. In general, the Division finds the tables acceptable. There are a few minor errors to be aware of, and these are listed in the attached comments.

There were several outstanding contingencies related to receipt of acceptable Benchmark Tables. The final submittal of the OUI Phase III RFI/RI Report will require inclusion of these new tables. Additionally, the Division withheld approval of the Phase I RFI/RI Workplans for OUs 8 and 12 based in part on the lack of approvable tables. We are now removing the benchmark-related contingencies from the final approval of these Workplans.

The intent of the Benchmark Tables is to provide a thorough compilation of standards from varying origins. They have been used by OU managers to select analytical methods for RFI/RI Workplans. They will become equally important as a reference as the lead OUs enter the CMS/FS Report phase and begin the ARARs identification process.

If you have any questions regarding these matters, please call Dave Norbury of my staff at 692-3415.

Sincerely,

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

cc: Sandy Marek, WQCD
 Gary Kleeman, EPA
 Mindy Davine, EG&G
 Laura Perrault, AGO
 Steve Tarlton, RFPU

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Colorado Department of Health
Comments on Potential Chemical-Specific Benchmark Tables

Note: The following comments apply to Table B-32, Statewide and Basin (CDH/WQCC) Surface Water Quality Standards.

- 1) Under the section labeled "Statewide Standards", there are two columns under Human Health Carcinogens/Noncarcinogens. Please note that *Water Supply* applies to the Rocky Flats Plant; the column labeled *Water and Fish* does not apply.
- 2) Under the section labeled "South Platte River Basin Stream Standards", there is a column under Physical, Biological, Inorganic, and Metals called *Chronic (7) Value*. This column does not apply and should not be used. This is an old listing of EPA criteria that has been replaced with the *Organics Table 1A*.
- 3) The row of standards for Uranium (Total) needs to note that the Aquatic Life Standards, shown as TVS, have units of ug/L. The radionuclide standards in that row on the far right, however, are correctly shown as having units of pCi/L.
- 4) 1,2-dichloroethene (cis) [CAS No. 1156-59-2] is shown to have a Water Supply standard of 70 ug/L. However, the Basic Standards document, 3.1.0, shows a standard of 0.03 ug/L for both Water Supply and Water and Fish.
- 5) Under the radionuclides section, all the values in the far right columns under *Radionuclides Table 2* with an "(a)" footnote should not be listed as site specific standards. They are correctly listed in the far left column under *Water Supply - Statewide Standards*.