

Phase I RFI/RI Report Response to CDPHE Comments

Rocky Flats Environmental Technology Site
Inside Building Closures
(Operable Unit 15)

U.S. Department of Energy
Rocky Flats Environmental Technology Site
Golden, Colorado

• Environmental Restoration Program

January 1995

REVIEWED FOR CLASSIFICATION/UCNI

By Mary A. Gage

Date 12-14-94

INTRODUCTION

This document responds to comments received from the Colorado Department of Public Health and Environment on the Draft Phase I RFI/RI Report, Operable Unit No 15, Inside Building Closures, August 1994. Each comment received is listed and followed immediately by a response. A copy of the original comment forms is provided at the back of the document for reference.

**RESPONSE TO CDPHE COMMENTS
ON THE DRAFT PHASE I RFI/RI REPORT,
OPERABLE UNIT NO. 15, INSIDE BUILDING CLOSURES**

GENERAL COMMENTS

Comment 1 Beryllium Contamination - This report concludes that beryllium contamination at IHSSs 179 and 180 is not directly attributable to waste materials stored at the IHSSs and will be addressed as a "building-wide" issue. The report further states that the appropriate approach to addressing the beryllium contamination is under the economic redevelopment and D&D programs at RFP. The National Conversion Pilot Project (NCP) submitted a draft IM/IRA PP to the Division which addresses the economic redevelopment of the buildings containing both IHSSs 179 and 180. In that document the DOE proposes to isolate and address contamination associated with the IHSSs independent of the NCP. The NCP proposal directly contradicts the statements in this draft report. Responsibility for beryllium contamination at these IHSSs must be fully acknowledged and clearly documented by the DOE. The generic transfer of responsibility to "on-going building operations" is not sufficient.

Response The references to addressing beryllium contamination under the economic redevelopment and D&D programs have been removed from the document. The future disposition of the OU15 IHSSs is beyond the scope of the RFI/RI Report, and will be addressed in the Proposed Plan and CAD/ROD. Section 5.2.8.2 of the Phase I RFI/RI Report has been restructured to emphasize that none of the post-rinsate smear samples taken from within IHSSs 179 and 180 exceeded the EG&G internal control level. The revised NCP Draft IM/IRA Decision Document, which was submitted for public comment on December 5, 1994, has been modified to no longer specifically exclude the OU15 IHSS areas. DOE now proposes to address these areas in a manner consistent with the rest of the NCP buildings.

Comment 2 Current Land Use - The Division requests clarification as to the current land use under which the DOE has classified the IHSSs within OU15. Specifically, do the standards cited under the current land use require radiation control area and/or radiation worker standards to be in place or are the standards based on unrestricted industrial use?

Response The OSHA standards (29 CFR 1910.96) are based on industrial use. The 10 CFR 20 and 10 CFR 835 standards require that facility owners/operators control worker exposures such that the specified dose limits are not exceeded. Therefore radiation protection controls associated with a Radiologically Controlled Area are not required by the cited regulations, but may be used as a mechanism to reduce worker exposures to the specified limits.

SPECIFIC COMMENTS

Comment 1 Sections 2.2 through 2.7 - The description of each IHSS in the Historical Use of IHSS sub-sections of sections 2.2 through 2.7 should state if the IHSS is in a radiation or beryllium control area, and present a brief rationale for the area posting

Response Section 2.0 has been reorganized to include a general discussion of how areas are posted and controlled with respect to radiation and beryllium at RFETS. Descriptions of how each IHSS is posted and controlled are also included in each individual IHSS Section

Comment 2 Section 4.2.3 page 19 - The bullet describing chi squared results for IHSS 179 at the top of this page states that random theory is valid at a 99 percent confidence level, but not at a 95 percent confidence level. This statement does not make sense, if you are 99 percent confident in a result then you must also be 95 percent confident in that same result. Additionally, the critical value for all confidence intervals cited must be reported in this section

Response This section of the Report has been rewritten to eliminate the presentation of two separate confidence levels. The statistical analysis using the Chi Square distribution now includes only a discussion of the 95 percent confidence level values, and is consistent for each of the six IHSSs

Comment 3 Section 5.0 page 1 - This section should also state that an electronic copy of the analytical data has been distributed to the Agencies with the report

Response This statement has been added to the introduction for Section 5.0

Comment 4 Section 5.1 - In this section the DOE claims that butyl benzyl phthalate detections in hot water rinsate are attributable to plastic in the sampling equipment and in flooring materials. Based on the sampling results presented in the report, butyl benzyl phthalate is not associated with the sampling equipment. Butyl benzyl phthalate was not detected in hot water rinsate equipment blank samples and was only detected in verification sampling at one IHSS. All references to butyl benzyl phthalate being associated with sampling must be removed from this report

Response The references to butyl benzyl phthalate being associated with the OU15 sampling equipment have been removed from the Report

STATE OF COLORADO

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

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

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Colorado Department
of Public Health
and Environment

August 19, 1994

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

RE: Comments - Draft Phase I RFI/RI Report Operable Unit No. 15 Inside Building
Cicaron, August 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 DCS and prime operating contractor, EG&G. The Division's comments are attached. Comments from the EPA will be forwarded under separate cover on receipt by the Division.

The Division finds the overall quality of this draft report to be very high. The Division commends the DOE and EG&G staff for their thorough, professional, and cooperative approach to the implementation of this investigation. The attached comments are largely editorial clarifications and should not require major revisions to the Final Phase I RFI/RI Report.

The Division recognizes that the buildings containing these IESCs are currently being considered for economic redevelopment by the DOE under the National Conversion Pilot Project (NCP). To that extent, the Division urges the DOE to integrate building clean-up activities under the NCP and any future actions associated with OUIs in as efficient a manner as possible.

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

Sincerely,

A handwritten signature in dark ink, appearing to read "Joe Schaeffer".

Joe Schaeffer
Rocky Flats IRS Unit Leader
Facilities Section
Hazardous Waste Control Program

cc Martin Westmark, EPA
Bill Fitch, DOE
Dennis Schube, EG&G
Steve Taylor, COPHE-02
Laura Ferrault, ACO

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

Comments

Draft Phase I RFI/RI Report
Operable Unit No 15 Inside Building Closure, August 1994

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