

DEC 20 1990

STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH

4210 East 11th Avenue
Denver, Colorado 80220-3716
Phone (303) 320-8333

Telefax:
(303) 322-9076 (Main Building/Denver)
(303) 320-1529 (Ptarmigan Place/Denver)
(303) 248-7198 (Grand Junction Regional Office)



Roy Romer
Governor

Thomas M. Vernon, M.D.
Executive Director

December 18, 1990

Mr. Robert M. Nelson, Jr.
Manager
U. S. Department of Energy
Rocky Flats Office
P. O. Box 928
Golden, Colorado 80402-0928

Mr. James O. Zane
Manager
E.G. & G. Rocky Flats, Inc.
P. O. Box 464
Golden, Colorado 80402-0464

Dear Messrs. Nelson and Zane,

Please find enclosed the comments of the Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division) concerning the Plan for Prevention of Contaminant Dispersion (PPCD), Draft Version 1.0, September, 1990.

Under separate cover, you will also receive comments from the Environmental Protection Agency. The Division expects DOE to address both the State's and EPA's comments entirely in the preparation of the Final Plan for the Prevention of Contaminant Dispersion.

The principle shortcoming of this document, in its present form, is that it is not a plan. The PPCD merely re-states guidance documents and makes no effort to propose a plan that can be used in the future to avoid airborne contaminant dispersal and to monitor and measure any progress in the control of windblown emissions.

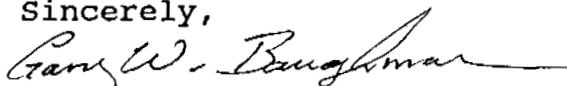
Another key concept incorrectly addressed in the PPCD is the risk associated with windblown contaminants. The document presently only covers the risk off-site. However, this is not our interpretation of the description of the PPCD in the IAG. Risk to on-site receptors must be considered.

ADMIN RECORD

A-SW-000459

If you have any questions regarding these comments, please call Joe Schieffelin of my staff at 331-4421.

Sincerely,



Gary W. Baughman
Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division

cc: Martin Hestmark, EPA
Joe Palomba, RFP
Dan Miller, AGO
Fraser Lockhart, DOE
Tom Greengard, EG&G
Richard Fox, RFP