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STATE OF COLORADO

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

4300 Cherry Creek Dr. S. Laboratory and Radiation Services Division
Denver, Colorado 80246-1530 8100 Lowry Blvd.
Phone (303) 692-2000 Denver CO 80230-6928
TDD Line (303) 691-7700 (303) 692-3090
Located in Glendale, Colorado

<http://www.cdphe.state.co.us>



Colorado Department
of Public Health
and Environment

January 12, 2001

Mr. Joseph A Legare
Assistant Manager for Environment and Infrastructure
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Beryllium Issues

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) would like to thank you for providing clarification of the Department of Energy's (DOE) position with regard to the Division's beryllium concerns at Rocky Flats Environmental Technology Site (RFETS) contained in your letter dated January 4, 2001.

As stated in your letter, and supported by the rationale provided, the surface beryllium contamination level of 0.2 ug/100cm² will be utilized as the Rocky Flats Cleanup Agreement (RFCA) standard for the "free release" determination for building surfaces and demolition waste.

As also indicated in your letter, we too look forward to consultations with RFETS personnel to establish appropriate air monitoring to provide confirmation that the decommissioning and demolition of buildings containing beryllium contamination, even if below the 0.2 ug/100cm² level, does not release beryllium contamination into the air above the established EPA ambient air level of 0.01 ug/m³.

In addition, as stated in your letter, RFETS intends to revise its characterization methodology to require further investigation if beryllium contamination is detected above 0.15 ug/100cm², which is 75 % of the cleanup standard (0.2 ug/100cm²). As previously discussed, this might be agreeable for known or suspected beryllium contaminated areas where sufficient numbers of samples are collected. However, as also previously discussed, we have been concerned with any detections of beryllium in areas where beryllium contamination was not suspected and minimal numbers of samples are collected. This is a particular issue in facilities, such as trailers, proposed for unrestricted release. As such, additional discussions with RFETS personnel (Tom Scott) have

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reached an agreement that any detection of beryllium above **0.1 ug/100cm²**, rather than the 0.15 ug/100cm² level, will generate further investigation, including possible collection of additional samples to properly determine beryllium concerns. Therefore, the characterization methodology (including the Reconnaissance Level and Pre-demolition Characterization) needs to be properly modified to incorporate the **0.1 ug/100cm²** level as the level of beryllium detection above which further investigation will be required.

Again we want to thank you for your efforts in reaching a resolution of these beryllium issues. If you have any questions regarding this correspondence please contact me at (303) 692-3367.

Sincerely,



Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, FCG, RFFO
Glenn Doyle, RFFO
Tim Rehder, EPA
Dave Shelton, KH
Tom Scott, KH
Administrative Records Building 850

