



to:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

889 18th STREET - SUITE 500
DENVER, COLORADO 80202-2488



000102549

Jim Jackson
D. Newland
for your info.
Don H. 9/26

SEP 19 1997

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

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To Steve Slater	From Tim Rehder
Dept/Agency	Phone #
Fax # 966 3710	Fax #

NSN 7540-01-317-7388 GPO-101 GENERAL SERVICES ADMINISTRATION

*File
5/9/98*

Mr. Steve Slater
Rocky Flats Field Office
Department of Energy
P.O. Box 28
Golden, CO 80402-0928

RE: Disposition of Soil Hotspot from Residual T3/T4 Project

Dear Mr. Slater:

This is to request further information concerning the disposition of a contaminated hot spot which was discovered near the Mound Contaminated Soil Feed Stockpile on March 22, 1997, and placed into 3 drums on May 8, 1997. Analysis provided to EPA dated June 20, 1997 indicated levels well below the Tier II action levels, therefore, EPA, in consultation with the Colorado Department of Public Health and the Environment (CDPHE) gave approval for these soils to be placed in the Mound excavation. However, following the approval for disposition of these soils, which occurred on August 28, 1997, EPA was notified that final disposition of the soils was postponed for several days, apparently due to concerns about the quality of the soil analysis. Subsequent to this, we were told that those issues were ironed out, thus they would proceed with placing the soils in the excavation, which concluded on September 8, 1997. One week later, we were notified that the analysis used to characterize this waste was not validated and the personnel who performed the calculations were not accredited to perform such tasks. Further analysis of the data indicated the radionuclide levels may be between Tier I and Tier II. Archived samples were sent off-site to an independent lab for confirmatory analysis.

We have several concerns and questions associated with the progression of events, which are as follows:

Who performed the original analysis? Why was the original analysis in error?

As stated above, prior to disposition of the hot spot soils, there was some concern by representatives at the site such that disposal was postponed for several days. Please provide further details as to what these issues were, and why concerns of validity and QA/QC were not addressed prior to placing the material in the excavation.

Which individuals or organization is responsible for instrument calibration/data computation, and who has been performing these tasks in past projects?



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Why was the data re-evaluated two weeks following the original decision for put-back of these soils?

What corrective measures will be taken to alleviate such errors in the future?

While we support the use of gamma spectroscopy as a method of rapid turnaround for radionuclide analysis in soils, individuals must be able to perform this method in a valid, repeatable, and accurate manner. Please provide us with a response to the concerns described in this letter. You may contact Jean Lillich at 312-6258 if you have any questions.

Sincerely,



Tim Rehder
Rocky Flats Team Leader

cc: Steve Tarlton, CDPHE
Carl Spreng, CDPHE
Dave Shelton, K-H
Cathy Schnoor, City of Broomfield
Mary Harlow, City of Westminster
Tom Marshall, CAB

