

Scott, Tom

From: David Kruchek [dakruche@smtpgate.dphe.state.co.us]
Sent: Tuesday, May 16, 2000 8:30 AM
To: tom.scott@rfets.gov
Subject: Group A RLCR

This is the Group A RLCR concurrence letter. The major concern is with the poor waste determination performed on the paint. Need to do a proper waste determination!

If you have any questions please give me a call.

May 12, 2000

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: Reconnaissance Level Characterization Report (RLCR) for Group A Facilities

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) has reviewed the RLCR for Group A Facilities, Revision 1 (dated March 10, 2000) received on April 25, 2000, and the Appendices on May 3, 2000. The Division hereby concurs with the RLCR for the Group A Facilities.

During the review of the information provided, the Division has the following comments, which have been previously provided to site personnel (Gerry Kelly):

1. Table 4-4 shows the highest level of U-238 for B551 to be 0.856 when according to Table 4-2 it should be 2.01.
2. Table 4-6 indicates that there are no Metals with TCLP results above LDR for sample 98A5236-007.003, yet according to the lab analysis sheet provided in Appendix A Mercury is shown to have a concentration of 171 ug/l, which is above LDR. This same sample also shows unusually high levels of Uranium (694 ug/l). In addition, analytical results for samples 98A5236-008.003, 009.003, 010.003, and 011.003 are provided without being identified in the Table. These samples are not identified as QC samples, and sample 011.003 appears to be above LDR for Pb, Hg, and Zn. Also, sample 98A5236-013.003 appears to be improperly identified on Table 4-6 for TCLP as 013.002.

The concern with the paint being above LDRs is interesting but this does not provide for a proper hazardous waste determination of the paint. Unless a determination has previously been made that the paint is a hazardous waste, LDR levels do not apply. Based on the analysis provided, the only sample that is a hazardous waste, and for which LDRs apply, is 98A5236-005.003, which fails for mercury with a TCLP level of .415 mg/l. The only sample that comes close to failing for lead appears to be 98A5236-011.003, which has a TCLP level of 4.4 mg/l.

3. Since B662 is currently occupied and fixed radiological contamination has been identified within B662, what actions are being taken to safeguard the workers? Is this area now properly posted? Are temporary remedial actions to be undertaken to seal the floor contamination (cracks) and protect the workers?
4. The paint in B910 does appear to present a potential disposal problem as indicated. However, there are other metals of concern besides lead, including chromium and mercury in making a hazardous waste determination, and others that exceed LDRs. Of course this only applies if paint is removed and thereby constitutes its own waste stream. As such, Table 4-

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18 does not appear to provide the necessary data. The two columns that should be provided are the metals detected above toxic characteristic levels (261.24 Table1) and those above LDRs (268.48 UTS). Table 4-18 currently does not provide a correct list nor all of the "Total Metals Detectable by ICP", nor the complete list of "Metals with TCLP result above LDR". Unless a previous hazardous waste determination of the paints has been made, apart from the sample results provided, this needs to be accomplished prior to comparison with the LDRs. The sample results need to be reviewed for TCLP results for all metals that exceed 261.24 levels, and those metals identified. TCLP for Hg needs to be performed, until this is accomplished Hg must be assumed to be a metal of concern that may exceed the regulatory levels.

As stated in this RLCR, all of the Group A facilities, Buildings 551, 662, 709, 910, and Tents 10 and 11, are classified as Type 2 facilities. In addition, all of these facilities except Building 709 and possibly 910 are still in use, which will necessitate additional investigations upon termination of activities in these facilities. As such, please keep us apprised of the required follow-on documentation to be prepared prior to disposition of these facilities.

If you have any questions regarding this correspondence please contact David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, FCG, RFFO
Tim Rehder, EPA
Tom Scott, KH
Brian Mathis, KH
S. Schiesswohl, AMEI, RFFO