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2002 NOV -1 P 3: 03

CORRESPONDENCE
STATE OF COLORADO

DUE DATE
ACTION

Bill Owens, Governor
Douglas H. Benevento, Acting 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

DIST.	LTR	ENC
BOGENBERGER, V.		
BOGNAR, E.	X	X
DECK, C. A.	X	X
DEGENHART, K.		
DIETER, T. J.		
DIETERLE, S. E.	X	X
FERRERA, D.W.	X	X
FERRI, M.S.		
GERMAIN, A. L.		
GIACOMINI, J. J.		
ISOM, J. H.		
LINDSAY, D. C.		
LONG, J. W.		
MARTINEZ, L.A.	X	X
NAGEL, R. E.	X	X
NORTH, K.	X	X
PARKER, A.M.		
POWERS, K.		
RODGERS, A. D.		
SHELTON, D.C.	X	X
SPEARS, M.S.		
TRICE, K.D.		
TUOR, N.R.		
VOORHEIS, G.M.		
WILLIAMS, J. L.		
BUTLER, L.	X	X
BROUSSARD, M.	X	X

October 24, 2002

Mr. Joe Legare
Assistant Administrator for Environment and Infrastructure
U.S. Department of Energy-RFFO
10808 Highway 93, Unit A
Golden CO 80401-8200

RE: Comments on Draft Sampling and Analysis Plan Addendum #IA-03-01

Dear Mr. Legare:

The Colorado Department of Public Health and Environment has reviewed the above-referenced SAP Addendum and has attached comments to this correspondence.

If you have any questions please contact Carl Spreng at 303-692-3358 or Elizabeth Pottorff at 303-692-3429.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator
Colorado Department of Public
Health and Environment

COR. CONTROL	X	X
ADMN. RECORD	X	X
PATS/130		

Reviewed for Addressee
Corres. Control RFP

11/1/02
Date By

cc: Reg Tyler, DOE
Dave Shelton, K-H
Marla Broussard, K-H
Tim Rehder, EPA

Dan Miller, AGO
Susan Chaki, CDPHE
Steve Tarlton, CDPHE-RFOU
Administrative Record, T130G

Ref. Ltr. #

DOE ORDER #

5400-1

1/3

NOV 1 2002
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ADMINISTRATIVE RECORD

ADMIN RECORD

IA-A-001686

**Comments by the Colorado Department of Public Health & Environment
on the
DRAFT SAMPLING AND ANALYSIS PLAN ADDENDUM #IA-03-01
September 2002**

1. In order to be useful in determining new sampling locations, the figures showing the existing sampling results need to show all relevant locations, whether or not the results were greater than the levels of concern. Since decisions for these IHSS Groups will be based on the proposed new action levels, it is not useful and inappropriate to compare analytical data to current action levels.

2. Section 1.2

The IA SAP describes 2 sampling grid sizes in Sections 4.3.1 and 4.3.2. The "expanded grid" described in this section is intermediate in size. Rather than label these samples "biased", it would be simpler and more straightforward to propose this grid size in a modification to the IA SAP. Such a modification should include the basis for this grid size and the types of justification required for its application. Otherwise sufficient information needs to be provided to properly support the expanded grid for each specific IHSS included in this addendum. This needs to include properly demonstrating that the more limited number of samples to be collected with the expanded grid will achieve the 90% confidence level for each IHSS, and the rationale for the placement of these "biased" statistical locations.

3. Section 2.2

The proposed biased sampling to be conducted under the building, as shown on Figure 3, should be modified as relevant to provide for sampling associated with foundation drains, sewers, sumps, etc. Also, considering fluoranthene and pyrene were identified under the building on the west side, additional samples should be collected in this area (and at appropriate and/or greater depths), and another sample should be located adjacent to the building foundation next to the process waste line on the north side of B374.

4. Section 3

Figure 5 needs to include the locations of all sumps, drains, drain lines, sewer lines, and other infrastructure to determine if additional biased sampling will be required. Particularly because B441 was previously a laboratory, it cannot be determined if the proposed sample location grid is sufficient or properly located. In addition, it appears that more biased samples need to be located along the PWL under and immediately west of B441. There will also need to be additional samples collected to determine the extent of the currently identified contamination, unless this is to be addressed during the excavation of this contamination. The list of PCOCs for B441 should include SVOCs.

5. Section 4

Because the existing sample locations are not shown on the Figure 9, it cannot be determined if the proposed locations are sufficient to properly characterize the known or potential UBC. This is especially a concern since UBC has been identified under B771.

Figure 9 (as well as Fig 7) should also include the locations of all sumps and other low areas such as the elevator shaft, as well as the tunnel to B776, which should be included in this UBC activity. The limited number and placement of samples is of particular concern when the number and locations of previously proposed sampling are considered (see IASAP, Appendix B).

Table 6 - The limited number of PCOCs needs to be explained, i.e., why are VOCs and SVOCs excluded from most sampling locations? Most of these sites are associated with process waste tanks or lines, which may have included these contaminants, and numerous previous sample results include detections of these contaminants.

Table 7 - Considering all of the UBC samples are only to be from 0 to .5 feet, does this interval correspond to all of the previously identified contaminant depths? If so, then this needs to be explained in the text. If not, then additional samples may need to be collected at deeper intervals.

According to Figure 9 it appears only 4 UBC samples are to be collected for B774. This does not seem sufficient to properly characterize the potential UBC for this building. There should also be additional samples associated with the process waste lines.

6. Section 5

Table 8 - SVOCs have been identified in the adjacent soil samples, therefore this section needs to explain why no SVOCs are included in the PCOC list.

Figure 11 - The samples to be collected in B865 should be biased to sumps, drains, PWLs, floor seams or cracks, and other areas of concern. Also, additional samples should be collected for B866.

7. Section 6

The contaminated material was initially stored on the 904 Pad prior to erecting the tents. The tents were erected after spills had already occurred, therefore, the expanded grid may not be sufficient. Biased samples should be collected at previous spill locations if possible. Also, because previous runoff may have occurred prior to erecting the tents, this sampling event should also include soil samples adjacent to the initial edge of the pad.