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March 2, 1992

Mr. Martin Hestmark
U.S. Environmental Protection Agency
Region VIII
999 18th Street, Suite 500, 8WM-C
Denver, Colorado 80202-2405

RE: Field Sampling Plan for the Standley Lake Diversion Project,
February 25, 1992

Dear Mr. Hestmark,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document prepared for the cities of Westminster, Northglenn, and Thornton by their contractor, CH2M HILL.

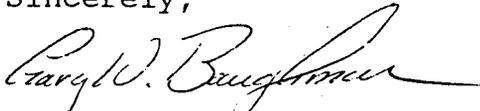
The Division is concerned about the soil sampling methodology outlined in the document. It is stated in Section 2.2 of the document that the sampling of soil and sediment will be initiated "to evaluate the potential risks to construction workers during construction (and) . . . potential risks to nearby residents, due to fugitive dust during construction, or to the settling of airborne contaminants in the residential area . . ." It is further stated in Section 2.3, item 3, that 99% of the plutonium inventory in off-site soils is contained in the upper 8.3 inches of soil, while only 50% of the inventory is contained in the upper 1.2 inches of soil. Section 5.0 explains that the soil sampling protocol to be used will be the CDH method taking 1/4 inch surface soil scrapes. The Division finds it hard to understand how the risks to workers and the public from an excavation project that will disturb 100% of the plutonium inventory in construction areas can be evaluated with samples from only the upper 1/4 inch of soil.

Further, the Division does not believe that the 10-acre soil sampling protocol is going to provide data that can be properly applied to the stated objectives of the sampling plan. Section 5.0 states that the soil samples should be representative of the canal alignment. We assume, since the text is unclear on this point, that the 10-acre parcels will be square and will be oriented so that the sides of the square run north-south and east-west. It is

possible that this sampling program would be satisfactory for areas 1 and 5 where ponds will be constructed that cover all or most of the respective 10-acre parcel. However, for areas 2, 3, and 4, only a portion of the 25 subsamples from a 10-acre parcel that straddles the canal alignment will be gathered from the actual alignment. The remaining subsamples will dilute and/or average the final results making an exposure assessment from soil disturbed within the alignment difficult.

The Division asks that these concerns be considered by EPA. We would be happy to help develop any alternative sampling programs that are necessary. If you have any questions regarding these matters, 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: Barbara Barry, RFPU
Bob Birk, DOE
Michael Guillaume, EG&G