STATE OF COLORADO

Bill Owens, Governor
Douglas H. Benevento, Executive Director

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

4300 Cherry Creek Dr. S.
Denver, Colorado 80246-1530
Phone (303) 692-2000
TDD Line (303) 691-7700
Located in Glendale, Colorado

Laboratory Services Division
8100 Lowry Blvd.
Denver, Colorado 80230-6928
(303) 692-3090

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

Colorado Department
of Public Health
and Environment

Linn D. Havelick, CIH
Director, Environmental Health and Safety Department
Colorado School of Mines
1500 Illinois St.,
Golden, CO 80401-1887

Subject: Review of project plans for CSMRI Creekside remedial action

Dear Mr. Havelik:

The Hazardous Materials and Waste Management Division (HMWMD) staff is reviewing five plans associated with the Creekside remedial action. We received the plans on April 1, 2004. It should be mentioned here that a review of plans by the Radiation Management Unit typically takes 30 – 45 days due to workload. Since there is an operational time constraint, the Division is trying to accommodate the School. The Division was not involved with the writing or signing of the Record of Decision (ROD), so a review prior to publication was not possible. However, some statements in the ROD are of concern to the Division, and are cited here so they can be addressed in the plans. Our understanding is that New Horizons is already revising the plans that were submitted, therefore specific comments will not be provided at this time. The following general comments shall be addressed prior to any material leaving the site:

1. The plans are not linked to the decommissioning plan required by the radioactive materials license. Correspondence from Mr. MacPherson dated February 26, 2004 indicates that plan will be delivered to the Department by May 3, 2004.
2. These plans do not characterize the wastes. The plans will not be approved and material shall not leave the site until the material is classified.
3. It is disturbing to the Division that there is not one figure in the five plans. It is the understanding of the Division that figures in the drafts of the plans were removed during internal review. Figures should be reinserted where appropriate, e.g., figures showing typical setting of work zones, a figure showing local transportation routes, and figures showing the Class I and Class II designated areas.
4. The plans do not address areas previously not characterized due to risk of breaking the old water main. Incorporate remediation of these areas into the plan. Since they were not previously characterized as Class I or Class II, it shall be assumed they are Class I until data show otherwise. Show these areas on a figure.
5. A stand-alone final status survey plan shall be generated. This can be a separate section to the SAP, and it should clearly describe the design of the final status survey. It too should have

appropriate figures showing the Class I and Class II areas based on characterization. Since the proposal of classifying the materials in three dimensions is novel (Class I areas remediated until they meet the criteria for Class II), the plan must be clear in how it is approaching the final status surveys for these areas.

If you have further questions, please contact Phil Egidi of this Division at 303-692-3447 or phil.egidi@state.co.us .

Sincerely,

Philip Stoffey
Remedial Programs
Hazardous Materials and Waste Management Division

PS:pve