

STATE OF COLORADO

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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

October 20, 2005

Mr. Linn Havelick
Director of Environmental Health and Safety
Chauvenet Hall Rm. 194
1015 14th Street
Golden, CO 80401

Subject: RML 617-01 – Comments on the Colorado School of Mines Research Institute - Creekside Site – Bagged Soil Disposal Work Plan Revision 1 Prepared by S.M. Stoller Corporation

Dear Mr. Havelick:

Staff has completed its review of the Colorado School of Mines Research Institute - Creekside Site – Bagged Soil Disposal Work Plan Revision 1 Prepared by S.M. Stoller Corporation received on September 30, 2005. Staff had previously met with Joe Gordon and Steve Brinkman on September 20, 2005 to discuss the initial Work Plan received September 6, 2005. Many of the comments discussed at that meeting have been incorporated, but not all of them. Until the following issues and comments are addressed, the Revised Work plan cannot be accepted.

WORK PLAN

1. Page 1. Under 1.2 **Site History**, the CSMRI license number RML #617-01 should be mentioned. Also Stoller should mention that the work is being done under their RML # 1094-01.
2. Throughout the text, the materials are constantly referred to as bagged soils and not as radioactive. There is no mention that the material has been defined by the Department as TENORM. In the Transportation Plan it indicates that the material is NORM. The original plan referred to the material as TENORM. This should be clarified in the text. Throughout this process CSM has consistently tried to either not mention the nature of this material or mischaracterize it as such things as solid waste and now soil. This only serves to slow down the review and approval process.
3. Page 2. Section 1.4 **Personnel Responsibilities**, first bullet indicates that the Project Manger will ensure that no employee exceeds the annual occupational dose or intake exceeding 10 percent of applicable regulations. As TLD monitoring is not planned, how will this be done?

4. Page 3. Section 2. **Project Objectives and Approach**, Last sentence in the next to last paragraph. Who will be monitoring and recording daily use of the global positioning system (GPS) of the location of the CSMRI material in the landfill?
5. Page 5. Section 3.2 **Work Area Dose Rate Monitoring**, mentions the equipment to be used for monitoring. License Condition (LC) 15.E. requires that the work plan include technical specifications and capabilities of survey instrumentation and equipment. This information is not in the work plan. As was stated in the meeting on September 20 with Stoller, they should go over their license and incorporate what is required in their plans.
6. Page 5. Section 3.3 **Radiological Contamination Control Procedures**, same comment as 5 above regarding instrumentation.
7. Page 6. same section-second full paragraph refers to SOPs with regards to performance testing and equations to calculate detection limits. These SOPs should be submitted for review.

MATERIALS TRANSPORTATION PLAN

1. Page 1. Section 2. **Material Classification** says, "The Material is classified as naturally occurring radioactive material (NORM)". This is incorrect.
2. Page 5. Table 5-1 refers to the Laboratory and Radiation Services Division as an Emergency Contact and gives the phone number of a chemist. This should be changed to the Hazardous Materials and Waste Management Division and the spill number should be 303.293.1788.
3. Page 6. Section 5.2.3 **Incident Review**, first paragraph, last sentence says, " This review will be documented and a report shall be issued... ". To whom will the report be issued?
Attachment 3 No. 2. The Project Manager will designate field response personnel who will collect field equipment and transportation (data?) during the incident evaluation. Please expand upon this.

SITE SPECIFIC HEALTH AND SAFETY PLAN

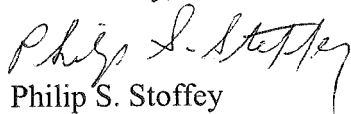
1. Page 1. **Personnel**. The RSO who is required to be on site or be in close contact by telephone as stated in the Work Plan (page 4) is not included in this section. The name title and phone number should be included.
2. Page 5. **Site Monitoring**. The last sentence states that operations will be evaluated by the site supervisor when wind speeds exceed 20 mph. How will this be determined?
3. Page 6. Required Facilities and Equipment indicates that restrooms will be public or at the school/close proximity. Page 9 of the Work Plan indicated that a portable facility would be available. Please clarify. (is some decontamination needed before they enter a public rest room?)
4. Page 6. Same section. The Spill Containment Cleanup equipment will be what?

5. Page 7. **Emergency Action and Response.** The evacuation step indicates that the workers assemble at the parking area and be accounted for. The parking area is not shown on the map

Page 1 of the Task Hazard Analysis indicates that the job may be videotaped and analyzed. Will the videotape and analysis be included with the final report?

If you have any questions with regards to this letter, please call me at 303.692.3452.

Yours Truly,



Philip S. Stoffey

Project Manager

CSMRI Creekside Site

Hazardous Materials and Waste Management Division

cc: Joseph Gordon, Stoller Project Director
File Copy 617-01, File 3.2