

# STATE OF COLORADO

Bill Owens, Governor  
Dennis E. Ellis, 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

June 6, 2006

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

Subject: RML 617-01 – Response to the Colorado School of Mines Research Institute - Creekside Site Final Site Characterization Work Plan Dated May 12, 2006 Prepared by S.M. Stoller Corporation

Dear Mr. Havelick:

The Colorado Department of Public Health and Environment (the Department) has completed its review of the Colorado School of Mines Research Institute - Creekside Site (Creekside site) Final Site Characterization Work Plan Dated May 12, 2006 prepared by S.M. Stoller Corporation. This report was prepared for Radioactive Materials License 617-01 to characterize the radioactive materials, solid wastes, and metals at the Creekside site, except for the regulated clay pits area. The plan is hereby approved and may be implemented in order to excavate all materials above the approved cleanup level and ascertain the volume of material that will need disposal. The Department has the following outstanding comments.

Section 2 – The request to change the cleanup criteria for mercury is denied on the information presented. Section 2 of the report indicates that the mercury level was adjusted to meet the ability of the laboratory to test for the compound. Table 7.4 of Section 7.9 indicates that the field portable estimated limits of detection for mercury is 14 ppm and Table 7.3 of Section 7.3.6.4 indicates that the laboratory detection limit for total mercury is 0.1 ppm.

The Department believes it is an unnecessary expense to do isotope-sensitive analysis when total activity analysis for uranium and thorium is just as accurate and reliable and much cheaper.

Section 5.2 - Known activity sources should be used to calibrate instruments and not background areas. In addition, the Department restates its position that

background had been determined at the site, and we will not accept field measurements as a means to change the approved background level.

Section 6.10.1 - The grey zone should not be 50% of the cleanup goal. 10 % is more realistic.

Section 6.11- Characterization of the stockpiles will need to be resolved before final disposition of the radioactive materials. The process presented for disposal characterization is not acceptable to the Department.

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: John Anderson, Counsel for the Governor's Office  
Cynthia Kaufman, AGO  
Jeff Deckler, HMWMD  
Joe Vranka, HMWMD  
Joseph Gordon, Stoller Project Director  
File Copy 617-01, File 3.2