

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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SEP 01 2005

Colorado Department
of Public Health
and Environment

August 26, 2005

Mr. Linn Havelick
Colorado School of Mines
Environmental Health and Safety
1500 Illinois Street
Golden, Colorado 80401

Subject: Colorado School of Mines Research Institute (CSMRI) Creekside Facility Site Remediation

Dear Mr. Havelick:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (Division), has reviewed the April 1, 2005 "Final Sampling Report, CSMRI Site, Containerized Material," prepared by S.M. Stoller Corporation for Colorado School of Mines. This report includes a risk assessment that concludes disposal of up to 30,000 cubic yards of contaminated soils from the Creekside site at the BFI Foothills landfill would not create a significant risk to workers, the general public, or the environment. Our review of this document leads us to the same conclusion, and therefore the Division approves this disposal option. Approval of this option applies only to the quantities and activity levels of the materials included in the risk assessment. Therefore, all work plans submitted for Division approval must include adequate characterization and assessment to demonstrate that the excavated and transported materials are consistent with the risk assessment parameters and assumptions. All work plans required by the Division as part of the decommissioning plan (i.e., Health and Safety Plan, Sampling and Analysis Plan, Task Plan, Materials Handling and Transportation Plan, and Quality Assurance Program Plan) must be revised to reflect this new approach to materials handling and disposal location, and must be submitted for approval. Your plans must include the following considerations:

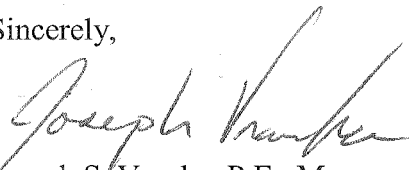
- adequate dust suppression techniques shall be used when loading the material;
- trucks shall have the tailgate diapered with plastic to prevent loss of material while in transit;
- trucks shall be properly covered to prevent loss of material while in transit;
- applicable DOT requirements for transportation of radioactive materials shall be met; and
- at the disposal facility, the material shall be placed at a depth consistent with the risk assessment modeling.

Disposal of this radioactive material at the BFI Foothills Landfill is also subject to approval by the Division's Solid Waste Program. The following recommendations have been forwarded to the Division's Solid Waste Program for their consideration regarding disposal of this material at the BFI Foothills Landfill:

- adequate dust suppression techniques should be used when unloading the material;
- disposal facility personnel should be briefed on the safe handling of the material, and such briefing documented. Division staff should be given 72 hour advance notice of this safety briefing, and invited attend at their discretion;
- material should be disposed upon receipt, and not stockpiled any longer than necessary for facility operation. In addition the material should be separated away from other landfill customers and municipal solid waste;
- material should not be used for daily cover;
- the final disposal location of the material should be documented;
- landfill equipment used to place the material should be thoroughly washed prior to reuse; and
- along with the Division's Solid Waste Program, the disposal facility should consider revising detection and compliance monitoring sampling plans for leachate and ground water to include appropriate radiological parameters.

Thank you for your consideration of these concerns. If you have any questions, please contact Mr. Phil Stoffey at (303) 692-3452.

Sincerely,



Joseph S. Vranka, P.E., Manager
Radiation Control Program
Hazardous Materials and Waste Management Division

Cc: Charles Johnson, CDPHE Solid Waste Unit Leader
Darrell Dearborn, CDPHE Solid Waste Unit
Elizabeth Stengle, BFI District Environmental Manager
Roy Laws, Jefferson County Department of Health and Environment
Jefferson County Board of County Commissioners