

STATE OF COLORADO

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Jane E. Norton, 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

December 17, 2001

Mr. Donald Metzler
Technical Manager
UMTRA Groundwater Project
U.S. Department of Energy
P.O. Box 2567
Grand Junction, CO 81502

RE: Additional CDPHE Comments on the Slick Rock Site Observation Work Plan (SOWP),
Dated September 2001

Dear Don:

After further review of the Slick Rock Site Observational Work Plan (SOWP), the Colorado Department of Public Health and Environment offers the following additional comments. With respect to the proposed Alternate Concentration Limit (ACL) for selenium, please explain why the human health risk based number (0.18 mg/l) is significantly higher than the Maximum Concentration Limit (MCL) for drinking water (0.05 mg/l). In addition, it is unclear how the ACL will be applied with respect to the Point of Compliance and the Point of Exposure.

Since there is the potential for agricultural use of groundwater at the site to irrigate hay, etc. and/or graze livestock, it is unclear how the ecological risk assessment addresses this issue. Through simple comparison with agricultural standards, especially for selenium, it appears that risks to livestock for either grazing or water supply would be unacceptable. The SOWP needs to clearly state that agricultural use of the groundwater needs to be restricted through implementation of Institutional Controls because of these risks. In addition, since these risks are present at the site, it is unclear how the ACL can be set at a level higher than that protective of agricultural use.

Sincerely,

Wendy Naugle, P.E.
UMTRA Groundwater Project Hydrologist

cc: Paul Oliver, CDPHE-GJ
Bill Von Till, NRC
FILE (SRK-7-A)

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