



State of Utah

Department of  
Environmental Quality

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*Executive Director*

DIVISION OF SOLID AND  
HAZARDOUS WASTE  
Dennis R. Downs  
*Director*

JON M. HUNTSMAN, JR.  
*Governor*

GARY HERBERT  
*Lieutenant Governor*

May 31, 2005

Joseph Gearo, Director  
Environmental Programs Office  
Dugway Proving Ground  
Dugway, Utah 84022-5000

Subject: Final RCRA Facility Investigation (RFI) Work Plan  
Solid Waste Management Units (SWMUs) 11& 41 Radiological Survey

Dear Mr. Gearo:

The Draft Final RFI Work Plan (Work Plan) is hereby approved. SWMU 11 is a landfill located on the northeast flank of Granite Mountain and SWMU 41 is located at the Avery area and includes piping, underground tanks, an impoundment and other equipment used in radiological tests.

All comments regarding the Work Plan have been adequately addressed. However, additional discussions concerning the handling of multiple radionuclides may be necessary if survey data indicate multiple radionuclides of concern. Areas selected for the background reference areas for both the soil and structure surveys appear to be adequate. Also, the dose limit applied in the Work Plan is 25 millirem per year (mrem/yr). The Environmental Protection Agency (EPA) has set a dose limit of 15mrem/yr. However, the use of the 25mrem/yr dose limit is consistent with the Utah Administrative Code R313-15-402. Therefore, the dose criterion used in the Work Plan is consistent with state regulations.

Because the Work Plan discusses radiological license issues, the Division has contacted the Utah Division of Radiation Control (UDRC) regarding investigation of these sites. The UDRC has indicated a desire to review the RFI Reports for these sites.

Please provide a 10-day notice of any sampling activities at these sites.

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If you have any questions, please contact Dave Larsen of my staff at (801) 538-6749.

Sincerely,

**ORIGINAL DOCUMENT SIGNED BY DENNIS R. DOWNS ON 5/31/05**

Dennis R. Downs, Executive Secretary  
Utah Solid and Hazardous Waste Control Board

DRD/DL/ts

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