

# STATE OF COLORADO

## COLORADO DEPARTMENT OF HEALTH

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July 20, 1989

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Colo. Dept. of Health  
Grand Jct. Office

Roy Romer  
Governor

Thomas M. Vernon, M.D.  
Executive Director

Mr. Joseph E. Virgona  
Project Manager  
U.S. Department of Energy  
P.O. Box 2567  
Grand Junction, Colorado 81502

Re: Colorado Response to Supplemental Standards Application for  
GJ 97007 OT; GRJ-X

Dear Joe:

We have reviewed the Application for Supplemental Standards and find it to conform to the requirements of 40 CFR 192 with exception to the items noted below:

1. Future Use: The recommendation in Section 3.0 relies upon a finding that no change in land use is expected in the "foreseeable future." The landowner, the City of Grand Junction, has provided a letter dated March 22, 1989 indicating that sections of Orchard Avenue will be disturbed as a result of reconstruction in 1991. The letter notes that tailings will probably be disturbed and possible need to be relocated as a result of this activity. Although this does not constitute a change in land use, it may constitute an activity that could cause the tailings to be relocated to an uncontrolled location before the UMTRA termination date. The REA needs to address this.

If tailings are likely to be disturbed during the life of the local UMTRA disposal cell, then we should provide assistance ensuring proper disposal. If tailings are likely to be disturbed after the local disposal cell is closed, then guidance on acceptable disposal practices should be developed as a part of the REA. Perhaps this is the basis for suggesting that a long-term tailings management, disposal and mitigation control plan be developed.

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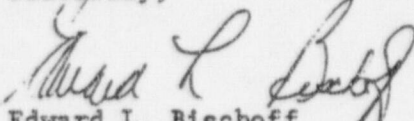
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PDR WASTE  
WM-39 PDR

2. Control Plan. The recommendation in Section 3.0 recognizes the potential for future migration of tailings from the Orchard Avenue. It suggests development and implementation of a long-term tailings management, disposal and migration plan addressing undiscovered deposits, deposits left in place through the application of SS and deposits not within existing inclusion boundaries. We find that this plan is an integral component of the application of SS to ensure that the definition of "control" is met; i.e. that tailings are placed in a condition that will minimize the risk to man over a long period of time. In addition, we find that development of such a plan would address concerns raised by the property owner, the City of Grand Junction.
3. Risk Assessment. The risk assessment does not consider radiation exposure to a worker who is completing utility repairs in the future. This exposure would be higher than that experienced on the surface in cases where waterline breakage required trench excavation. Given the significant quantities of tailings left in utility corridors throughout Mesa County this potential risk of exposure to workers should be assessed.

An adequate response to items 1 and 2 will be necessary prior to our concurrence. If information is not available to address item 3, a commitment to gather utility worker exposure data and address the potential health risks by a specific date in 1989 would be satisfactory for conditional concurrence.

If you have any questions, please call me at 303-331-4813.

Sincerely,

  
Edward L. Bischoff  
UMTRA Program Manager  
Hazardous Materials and  
Waste Management Division

ELB:lh

cc: Bud Franz/CDH ✓  
Jody Garcia/DOE