

# 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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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: CDPHE Comments on the New Rifle Environmental Assessment Dated November 2001

Dear Don.

The Colorado Department of Public Health and Environment (CDPHE) has completed its review of the above referenced document. At this time, we can only offer general comments, because the submission of the Environmental Assessment (EA) is premature. In September 1999 Colorado Department of Public Health and Environment received, reviewed and commented on the Site Observational Work Plan (SOWP) for the New Rifle site. As stated in the Executive Summary of the SOWP, "the strategy is to perform natural flushing groundwater remediation in combination with establishment of alternate concentration limits (ACLs) and institutional controls. Pending results of a pilot study, the strategy for vanadium may require some type of active remediation." Since that time, DOE has performed the vanadium pilot test and apparently based on the results of the pilot test results, DOE has decided to pursue a Technical Impracticability (TI) approach for vanadium.

The normal flow of documents under the UMTRA Groundwater Project is: the SOWP, followed by a draft Groundwater Compliance Action Plan (GCAP), followed by the National Environmental Policy Act (NEPA) documentation, followed by the final GCAP. In the case of New Rifle, the NEPA documentation has been submitted prior to the GCAP and the strategy presented represents a significant change from that presented in the SOWP. Without the amended SOWP and the GCAP, as well as the pilot study performance report, the EA does not include enough detail about the comparison of alternatives to support the TI approach.

It is premature for the DOE to make decisions under NEPA before the supporting background documents are available and have been reviewed. Therefore, we request that DOE temporarily suspend the public comment period on the EA and submit the necessary background documentation to support the TI approach. This should

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include the pilot test performance data and a detailed comparison of alternatives for remediation, including in-situ stabilization, permeable reactive barriers, source removal and use of lixiviant. The comparison should also include full economic analysis of each technology. This background documentation should be made part of a revised SOWP, included in the GCAP, or made otherwise available to the State, the public and other reviewing agencies prior to re-opening public comment on the Environmental Assessment.

Please call if you have any questions.

Sincerely,



Wendy Naugle, P.E.

UMTRA Groundwater Project Hydrologist

cc: ~~Bill~~ Von Till, NRC  
FILE (RFL-7-A)