

# FUSRAP Document Management System

Year ID  
00 4071

Further Info?

Operating Unit  
Iowa

Site

Area

MARKS Number  
FN:1110-1-8100g

Primary Document Type  
Public Affairs/Community Relation

Secondary Document Type  
Correspondence

## Subject or Title

IDPH review and comments on letter dated March 19, 2004 responding to seven questions posed by Dan McGhee in email dated March 5, 2004.

Author/Originator  
Donald Flater

Company  
IDHP

Date  
4/23/2003

Recipient (s)  
Sharon Cotner

Company (-ies)  
FUSRAP

Version  
Final

Original's Location  
Central Files

Document Format  
paper

Confidential File?

Comments

## Include in which AR(s)?

- North County
- Madison
- Downtown
- Iowa

ETL

SAIC number

Filed in Volume

Bechtel ID



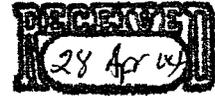


# Iowa Department of Public Health

Thomas J. Vilsack  
Governor

Sally J. Pederson  
Lt. Governor

Mary Mincer Hansen, R.N., Ph.D.  
Director



April 23, 2003

Sharon Cotner  
FUSRAP, USACE  
FUSRAP Project OFFICE  
8945 Latty Avenue  
Berkeley, MO 63134

Dear Ms. Cotner:

I have reviewed your letter, dated March 19, 2004. In that letter you responded to seven questions posed by Dan McGhee in an email message dated March 5, 2004. I find that your responses are evasive and ambiguous. *We* will address specific issues after discussing the primary motivation in asking the questions.

So that more immediate and future plans are based in good, statistically defensible science, the State wants a formal interpretation of the flyover data. FUSRAP, the Army, the EPA and the State must formally agree to this interpretation. This formal agreement is the only mechanism by which the flyover data may be effectively employed in separating ER,A activities from those of FUSRAP and developing future plans.

Your letter contains phrases such as "...lists were developed after fully considering...the Flyover [sic] data..." "...[These areas] are considered free of radioactive contamination with the detection capabilities of the Flyover [sic]..." and "...FUSRAP used the data from the Flyover [sic] to better define..." These statements imply that an interpretation of the flyover data exists. If this is true, the State has not had the opportunity to be involved in the interpretation.

In attempting to answer our first question, "To date, how have you applied the data from the flyover to address 'areas that must be covered under FUSRAP, rather than Environmental Restoration, Army...?'" you state, "These lists [those dividing IAAAP between ER,A and FUSRAP] were developed after fully considering all of the available historical data, including the Flyover [sic] data." To our recollection, in the meetings and correspondence regarding the generation of these lists, including the meeting in Des Moines in December 2003 at which they were presented, the only document used was the Preliminary Assessment, dated December 2001 and written by FUSRAP. We can find no notes or correspondence referring in any way to the flyover. In the event that our records are incomplete, would you please provide us with the documentation that uses the flyover to separate the areas of IAAAP and generate the lists?

In attempting to answer our second question, "To date, how have you applied the data from the flyover to 'conduct further site assessments...?'" your letter states, "...FUSRAP used the data from the Flyover [sic] to better define the study area for the IAAAP Radiological Survey Plan...." In our review of that plan, we found no reference to the use of flyover data. In fact, the closest applicable statement is on Page 5 of the draft plan. "Previous characterization, removal actions and associated reports will be reviewed (*emphasis*

**Promoting and protecting the health of Iowans**

Bureau of Radiological Health, 401 SW 7<sup>th</sup> Street, Des Moines, IA 50309 • 515-281-3478 • [www.idph.state.ia.us](http://www.idph.state.ia.us)

DEAF RELAY (Hearing or Speech Impaired) 711 or 1 800-735-2942

CF: Mattings, Hansen, Cotner

Sharon Cotner  
April 23, 2004  
Page 2

*added*) during the initial assessment of each area.” The statement in your letter and that in the plan appear to contradict one another. (Please note that we made an appropriate comment in our response to the draft survey plan.)

The discussions in the two preceding paragraphs contain the implicit assumption that an interpretation of the flyover data exists. We covered the existence of the interpretation earlier.

As a corollary to this discussion of your letter, it is our expectation that you incorporate the data from the flyover into any radiological sampling plans that you author for implementation at IAAAP. We want to reiterate our stance on developing these sampling plans.

In our comments to “Iowa Army Ammunition Plant Radiological Survey Plan,” enclosed under the cover of our letter to you dated March 3, 2004, we stated:

*MARSSIM [Multi-Agency Radiation Survey and Site Investigation Manual] represents the collective inputs and collaborative efforts of, and was endorsed by, the Environmental Protection Agency, the Department of Energy, the Nuclear Regulatory Commission and the Department of Defense. When MARRSIM was published, because of the federal endorsements, the State of Iowa took the position that no survey plan would be approved if it did not conform in its entirety to the framework laid out in MARSSIM.*

As you can see, your letter raises more questions than it answers. We are open to suggestions on how to proceed. It is, however, imperative that not only you and we, but also the EPA and the Army, participate in the resolution of these issues.

We will not approve, any sampling plan that does not include, the planning and statistical rigor inherent in the use of MARSSIM. Any thing less is not defensible, especially to the general public whose interests that we both serve.

If you have any questions or comments, please contact me or Dan McGhee at 515/725-0305.

Sincerely,



Donald A. Flater, Chief  
Bureau of Radiological Health  
515/281-3478  
515/725-0318  
[dflater@idph.state.ia.us](mailto:dflater@idph.state.ia.us)

cc: Tom Newton  
Brian Gentry  
Scott Marquess, EPA