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RES. CONTROL
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93-RF-12462

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.
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October 7, 1993

93-RF-12462

J. K. Hartman
Assistant Manager
Environmental Restoration
DOE, RFO

Attn: R. J. Schassburger

OPERABLE UNIT NO. 2 SUBSURFACE INTERIM MEASURE/INTERIM REMEDIAL ACTION -
NMH-522-93

Ref: J. K. Hartman ltr (11270) to N. M. Hutchins, Operable Unit 2 Subsurface IM/IRA Schedule
Extension, September 24, 1993

The letter received from the Environmental Protection Agency (EPA) on September 18, 1993 has been reviewed by EG&G Rocky Flats, Inc. (EG&G Rocky Flats) Environmental Restoration Management. A statement was made concerning the presence of Non-Aqueous Phase Liquids (NAPLs) at test site number 1 for the Subsurface Interim Measure/Interim Remedial Action (IM/IRA) utilizing soil vapor extraction (SVE). The statement was specific to the performance of the Granular Activated Carbon (GAC) utilized to treat the extracted vapors. The statement also addressed whether free phase NAPLs were expected at Individual Hazardous Substance Site (IHSS 110), the location of test site number 1.

The SVE system was designed to treat volatile organic compound (VOC) concentrations based on the following data:

- Phase I Remedial Facilities Investigation/Remedial Investigation (RFI/RI) data reported in 1989.
- Alluvial well data and VOC concentration distribution maps from the alluvial work plan.

At the time the IM/IRA was developed, no Phase II RFI/RI data was available and a Soil Gas Survey had yet to be performed. The SVE Pilot Plant was designed to treat an anticipated VOC concentration of 10 to 100 parts per million volume (ppm-V). Based on the information available, the prediction of this range of VOC concentration was reasonable and treatable in an effective manner by GAC. It was anticipated that if NAPL material were present, it would exist as a residual in the soils and not as a free-phase substance saturating the soil pore space. Given the data available at the time of the SVE, free-phase NAPLs in the subsurface design could not have been anticipated.

The issue of whether to treat the NAPL material using the existing design at test site number 1 will be further discussed with both the Environmental Protection Agency (EPA) and the Colorado Department of Health (CDH), EG&G Rocky Flats and S. R. Grace of the Department of Energy, Rocky Flats Office (DOE, RFO) in a meeting to be held on October 12, 1993 at EPA's office.

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1312-RF-93

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12/MP

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During this meeting, proposed modifications and schedule requirements needed to implement changes to the test plan and SVE pilot plant will be presented and evaluated for the treatment of NAPLs located at IHSS 110.



N. M. Hutchins
Acting Associate General Manager
Environmental Restoration Management

MDK:mp

Orig. and 1 cc - A. H. Paule