

CORRES CONTROL  
OUTGOING LTR NO

# EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC  
ROCKY FLATS PLANT, P O BOX 464, GOLDEN, COLORADO 80402 0464 • (303) 966-7000

DOE ORDER# 94 RF 00314

DIST	LTR	ENC
AMARAL, M E		
BENEDETTI R L		
BENJAMIN A		
BERMAN H S		
BRANCH D B		
CARNIVAL G J		
COPP R D		
DAVIS J G		
FERRERA D W		
HANNI B J		
HARMAN L K		
HEALY T J		
HEDAHL T		
HILBIG J G		
HUTCHINS N M	X	
KIRBY W A		
KUESTER A W		
MAHAFFEY, J W		
MANN H P		
MARX, G E		
MCDONALD M M		
McKENNA, F G		
MONTROSE J K		
MORGAN R V		
POTTER G L		
PIZZUTO, V M		
RISING T L		
SANDLIN N B		
SETLOCK, G H		
STEWART, D L		
SULLIVAN, M T		
SWANSON, E R		
WILKINSON, R B		
WILLIAMS, S (ORC)		
WILSON, J M		
WYANT, R D		
<i>Drumrose A L</i>	X	
<i>Lauren D J</i>	X	
<i>Spicer S G</i>	X	
<i>Belton M</i>	X	
<i>Anderson B M</i>	X	
<i>Ward R E</i>	X	
<i>Voss J M</i>	X	
CORRES CONTROL	X	X
ADMIN RECORD/080		
PATS/T130G		
TRAFFIC		

January 11, 1994



94-RF-00314

000021253

Martin H McBride  
Acting Assistant Manager for  
Environmental Restoration  
DOE, RFO

### COMPARISON OF OPERABLE UNIT NO 2 FIELD TREATABILITY UNIT INFLUENT PROCESS WATER DATA TO APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARS) - NMH-005-93

This letter is in response to the December 29, 1993 letter from the Colorado Department of Health (CDH) requesting " a written explanation as to the basis for the decision," to not remove affected soils, in the December 4, 1993 release of approximately 10 gallons of hazardous waste from the Operable Unit No 2 (OU 2) Field Treatability Unit (FTU) EG&G's Environmental Operations Management department transmitted a Resource Conservation Recovery Act (RCRA) Contingency Plan Implementation Report No 93-010 to CDH, documenting the release

The FTU treats surface water collected from Surface Water Locations SW-59, SW-61 and SW-132, respectively a seep, South Walnut Creek, and a culvert that drains surface water from within the Protected Area These surface water locations are located within the South Walnut Creek Drainage Basin The FTU is designed to remove those analytes for which ARARs have been established in the Surface Water Interim Measure/Interim Remedial Action Plan Surface water Location SW-59, a seep containing analytes above ARARs in the South Walnut Creek drainage basin, flows at approximately 1 gpm The remaining surface water flow to the FTU, comprised of SW-61 and SW-132, equals approximately 39 gpm and does not contain significant analytes above ARARs DOE is currently in negotiations with EPA and CDH to discontinue collection and treatment of surface waters at SW-61 and SW-132

Table 2 of the RCRA report listed Volatile Organic Compounds (VOCs) that were in excess of the Safe Drinking Water Act Maximum Contaminant Levels (SDWA MCLs) Column 1 of Table 2 listed the highest and average values detected for samples collected only from SW-59 from May 29, 1992 to December 8, 1993 The analyses from SW-61 and SW-132, which comprise the majority of the flow, were not presented in the report A more accurate representation of influent water quality is found in analyses of samples from process water location RS-2 This location represents the combined surface water flows that are influent to the treatment system

CLASSIFICATION	
UCNI	
UNCLASSIFIED	
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SECRET	

AUTHORIZED CLASSIFIER  
**DOCUMENT CLASSIFICATION**  
REVIEW WAIVER PER  
CLASSIFICATION OFFICE

IN REPLY TO RFP/CC NO 4/A

ACTION ITEM STATUS  
 PARTIAL/OPEN  
 CLOSED

LTR APPROVALS

ORIG & TYPIST INITIALS  
rem/cet

ADMIN RECORD

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Attached is a list of the volatile organic contaminants and total metal contaminants for which ARARs have been established for the OU 2 Surface Water FTU Presented also is the averaged data from two sampling events from sample location RS-2.

A comparison of data from RS-2 with the ARAR values indicates that the combined surface water influent to the FTU is not contaminated with respect to ARARs, with the exception of tetrachloroethene (concentration 20 µg/l ARAR 10 µg/L) and zinc (concentration 80 µg/l ARAR 50 µg/l) The Safe Drinking Water Act (SDWA) standard for tetrachloroethene is 52 µg/L, therefore, the concentration of PCE at RS-2 is below SWDA standards The ARAR for Zn is below the background level of 175 µg/L for stream water and 1,556 µg/L for seep/spring water (Background Geochemical Characterization Report, September 30, 1993)

If you have any questions please call Robin Madel of Environmental Engineering and Technology at extension 6972

  
N. M Hutchins, Director  
Environmental Science & Engineering  
EG&G Rocky Flats, Inc

TCG:cet

Orig and 1 cc - M H McBride

Attachment  
As Stated

cc  
T E Lukow - DOE/RFO  
A H Paule - DOE/RFO  
J Pepe - DOE/RFO  
B K Thatcher - DOE/RFO  
V F Witherall - DOE/RFO  
E A Dillé - Aguire  
B McCarthy - SMS  
J Stewart - SMS

COMPARISON OF CONCENTRATION OF ANALYTES  
AT RS-2 TO ARARS

<u>ANALYTE</u>	<u>ARARs</u>	<u>CONCENTRATION AT RS-2</u>	<u>UNITS</u>
1,1-DICHLOROETHENE	7	ND	µg/l
CHLOROFORM	1	0.7	µg/l
CARBON TETRACHLORIDE	5	3.0	µg/l
TETRACHLOROETHENE	1	2.0	µg/l
TRICHLOROETHENE	5	3.0	µg/l
VINYL CHLORIDE	2	ND	µg/l
ALUMINUM	240	21.65	µg/l
ARSENIC	50	1.00*	µg/l
BARIUM	1000	153.00	µg/l
BERYLLIUM	100	1.00*	µg/l
CADMIUM	5	3.00*	µg/l
CHROMIUM	10	4.00*	µg/l
COPPER	25	2.00*	µg/l
IRON	1000	140.95	µg/l
LEAD	5	1.00*	µg/l
MANGANESE	1000	31.00	µg/l
MERCURY	2	0.20*	µg/l
NICKEL	40	6.00*	µg/l
SELENIUM	10	2.65	µg/l
ZINC	50	80.10	µg/l

ND Non-detection

\* Value shown is at detection limit