

CORRES. CONTROL  
INCOMING LTR NO.

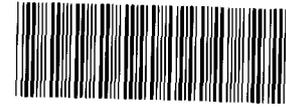
tates Government

20210  
Department of Energy  
Rocky Flats Field Office

# memorandum

NOV 2 1995

EP:DG:14194



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Trench 3 and Trench 4 Comments

T. G. Hedahl, Director  
Environmental Restoration/Waste Management & Integrating Operations  
Kaiser-Hill Company, L.L.C.

Attached are the Department of Energy's comments on the Draft Operable Unit (OU) 2 Proposed Action Memorandum and Sampling and Analysis Plan for Source Removal at Trenches T3 and T4. Please address the comments and forward the responses back to DOE for resolution. Upon successful resolution on the DOE comments, the revised document will be forwarded to the Regulatory Agencies for further review comments.

This response is not intended to change the current scope, cost, or schedule for the Contractor. For additional information or coordination, please contact me at extension 5669.

David George  
Program Manager  
Environmental Programs

cc: w/o Attachment  
J. Wienand, EP, RFFO  
S. Tower, EP, RFFO  
D. George, EP, RFFO  
Admin Record

02677 RF 95

DUE DATE 12/6/95

ACTION Hedahl/CAED

DIST.	LTR	ENC
BORGMAN, K.A.		
BUHL, T.R.		
CARD, R.G.	X	X
DEAN, C.		
EVANS, B.L.		
FERRERA, D.W.		
GILLISON, W.R.		
GRANT, B.A.	X	X
HEDAHL, T.G.	X	X
HERRING, C.L.		
HILL, J.A.		
HUEMAN, T.P.		
KELL, R.E.		
KELLY, G.M.		
LAREAU, D.M.		
LEE, E.M.		
MANI, V.		
MARTINEZ, L.A.		
McANALLY, J.L.		
McGOVERN, L.J.		
McKAY, R.		
McKIBBIN, J.G.		
MEADOWS, S.M.		
OKEY, R.		
O'BRIEN, G.D.		
PANGERSIS, P.A.		
SANDLIN, N.B.		
SHUMWAY, W.K.		
STAGG, R.		
STEELMAN, M.		
TUOR, N.R.		
TURNER, K.A.		
VOORHEIS, G.M.		
WALLER, C.A.		
Hayes, J.	X	X
Radner, A.	X	X

CORRES. CONTROL	X	X
ADMIN RECORD/080	X	X
PATS/T130G	X	X

Reviewed for Addressee  
Corres. Control RFP

11/6/95 [Signature]  
DATE BY

Ref Ltr. #

DOE ORDER # 5400.1

NOV 1995  
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RECORDS CENTER

ADMIN RECCRD

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**COMMENTS ON THE  
DRAFT PROPOSED ACTION MEMORANDUM  
FOR  
SOURCE REMOVAL AT TRENCHES T-3 AND T-4  
OPERABLE UNIT NO. 2**

1. Sec 1.0, 1st sen: Suggest adding discussion here regarding the removal of free liquids from Trench T-3. Also, add some discussion about the presence of diesel in T-3.
2. Sec 2.0; 2nd sen: Data for Trench T-4 should have been published in the Draft and Final Phase II RFI/RI Report for Operable Unit No. 2. Please correct reference as appropriate.
3. Sec 2.1: Add discussion as to how diesel and solvents were deposited into the trenches.
4. Sec 2.1, 1st par., last sen.: Add statement here as what exposure pathway was used in assessing the exceedance of PPRGs (i.e., office worker, open space, etc.).
5. Sec 2.2: Please add discussion here about the No. 1 sandstone and what its hydrogeological characteristics are and how they relate to T-3 and T-4 contamination. Also, it would be helpful to present a conceptual schematic showing the hydrogeological conditions and contamination. Such figures are readily available in the RI Report.
6. Sec 2.3.1: Are the data presented inclusive of the data collected during the Trench Characterization field work (including geophysical surveys and direct drilling in the trenches) performed during the spring of 1995? If not please explain why.
7. Sec 2.3.1, p. 3, 1st par., last sen: Suggest changing word "...through..." to "under" since ground water does not get high enough to move through the trenches. Please correct this throughout the document.
8. Table 2.3.1: Since the monitoring wells discussed are so close together (24993 and 24393) the argument that these wells are in fact upgradient is not substantiated very well. Suggest adding well 23293 sampling results to help support this argument. Also, state what formation the upgradient wells are screened in (RFA, claystone, or No. 1 sandstone). A cross section would greatly enhance the discussion in the text.
9. Sec 2.3.1, p. 5, 2nd par, 3rd sen: Add discussion about the high radionuclide (800,000 pCi/L Gross alpha and 750,000 gross beta) sample results from the free liquid samples collected in November 1994.

**COMMENTS ON THE  
DRAFT MODIFICATION OF THE  
OPERATING PERMIT  
AT RFETS**

27. Sec A.2.2.1, p. 28, 1st par, last sen: Free liquids are known to exist in T-3, describe here how the free liquids will be handled and treated.
28. Sec A.2.2.1, p. 28, 2nd par: Explain what debris (i.e., asphalt planking, crushed drums, etc.) that we currently know are in the trench will be handled and treated.
29. Sec A.2.2.3: Provide data on the free product sample results from November 1994 and show diesel contaminant levels in this section also.
30. Sec A2.2.5, p. 33, 1st par, 7th sen: Explain why the waste streams are expected to be free of radionuclides when sample results data show that radionuclides exists in subsurface soils.
31. Sec. A.4, p. 34, 3rd par. states that no documentation exists to determine what type of waste was generated and where the waste was generated that was disposed of at T-3 and T-4. Documentation does exist in old waste disposal meeting minutes, so the explanation in this paragraph should be re-worded.

**COMMENTS ON THE  
DRAFT FIELD SAMPLING PLAN  
FOR THE SOURCE REMOVAL AT  
TRENCHES T-3 AND T-4  
OPERABLE UNIT NO. 2**

32. Sec 2.0, p. 2, 2nd par, 3rd sen: DOE disagrees with not analyzing for radionuclides in the post-excavation samples. Since this action is not considered a final remedy, DOE must be able to present data in the future that technically justifies no further action at T-3 and T-4. Therefore, the confirmation samples should allow for analysis of radionuclides. Moreover, the cost of having to sample T-3 and T-4 in the future for radionuclides far exceeds the relatively small cost of sampling for those constituents at this time.
33. Figure 3.1: What are the dimensions of the grids in the figure. Please provide the dimensions on the figure and in the text.
34. Sec 3.2, post processing sampling: DOE disagrees with not analyzing for radionuclides in the post-processing samples. KH must provide data results that will technically justify to the public that T-3 and T-4 do not pose a radiological threat to the environment after the treated soils are placed back into the excavation. Without these data, DOE may be required to go back to T-3 and T-4 and resample for radionuclides which will be more costly in the long run than adding the analysis now.