

DOE ORDER #

96-RF-02824



May 6, 1996

96-RF-02824

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Jessie M. Roberson, Assistant Manager  
ES&H and Program Assessment  
DOE, RFFO

HEDAHL, T. G.	X	Y
MORTH, K.		
HELTON, D. C.		
VHALEY, D. L.		

Attn: Dave George

**NECESSARY AND SUFFICIENT SAMPLING FOR THE OPERABLE UNIT (OU) 1/OU 2  
CONSOLIDATED TREATMENT PLANT - TGH-103-96**

Siemelt, K.L.	X	X
Hahn, S.J.	X	X

Attached for your use is a draft letter to the U. S. Environmental Protection Agency (EPA) and the Colorado Department of Public Health and Environment (CDPHE) regarding necessary and sufficient sampling for the OU 1/OU 2 consolidated treatment plant. This letter is a follow up to the Department of Energy's (DOE's) December 7, 1995, letter (95-DOE-12832) to EPA and CDPHE on this matter.

Specifically, we proposed eliminating the sampling at the collection well and the french drain for polychlorinated biphenyl (PCB)/pesticides and semi-volatile constituents. No significant contamination from these parameters has been detected since April 1992. Further, the OU 1 Interim Measure/Interim Remedial Action (IM/IRA) does not require these parameters to be monitored in the effluent prior to discharge.

Additionally, we recommended discontinuing sampling at the following surface water locations: SW035, SW036, SW038, SW070. These locations were originally canceled from the sitewide surface water program and then were included in the OU 1 French Drain Performance Monitoring Plan. While these stations have been sampled as part of the OU 1 IM/IRA performance monitoring, these data have not been reported in the quarterly reports.

ORRES. CTRL	X	Y
RAFFIC		
ADMIN. REC.		
ATS		

We have discussed these proposals with EPA and CDPHE at the December 20, 1995, OU 1 Joint Working Group Meeting. EPA and CDPHE agreed in concept and requested we provide additional information on the surface water sampling. This information is provided in Attachment 2. Kaiser-Hill discussed that this sampling would not be conducted in the first quarterly sampling in fiscal year 1996. However, if EPA and CDPHE had concerns after reviewing the information and still wanted the sampling to be conducted, we would go back and take additional samples. To date, these samples have not been collected.

If you required any additional information or have any questions, please feel free to contact Steve Hahn, of my staff, at extension 9888.

CLASSIFICATION:		
CN		
UNCLASSIFIED	X	X
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER  
SIGNATURE

Tim G. Hedahl, Division Manager  
ER /WM&I Operations

Exempt from Class.  
per CEX-266-95

REPLY TO RF CC NO:  
None

KLW:kam

CTION ITEM STATUS  
\_ PARTIAL/OPEN  
\_ CLOSED

Orig. and 1 cc - J. M. Roberson

TR APPROVALS:

Attachments:  
As Stated (2)

ORIG & TYPIST INITIALS  
Kam :kam

Kaiser-Hill Company, L.L.C.

Courier Address: Rocky Flats Environmental Technology Site, State Hwy. 93 and Cactus, Rocky Flats, CO 80007 ♦ 303.966.7000  
Mailing Address: P.O. Box 464, Golden, Colorado 80402-0464



Mr. Tim Rehder  
U.S. Environmental Protection Agency, Region VIII  
ATTN: Rocky Flats Project Manager, 8HWM-FF  
999 18th Street, Suite 500  
Denver, Colorado 80202-2466

Mr. Joe Schieffelin  
RCRA Unit Leader  
Colorado Department of Public Health and Environment  
4300 Cherry Creek Drive South  
Denver, Colorado 80222

Ms. Susan Chaki  
Hazardous Wastes Cleanup Program  
Colorado Department of Public Health and Environment  
4300 Cherry Creek Drive South  
Denver, Colorado 80222

Dear Mr. Rehder, Mr. Schieffelin, Ms. Chaki:

The purpose of this letter is to follow up to our December 7, 1995 letter (95-DOE-12832) to the U.S. Environmental Protection Agency (EPA) and the Colorado Department of Public Health and Environment (CDPHE) on necessary and sufficient sampling for the Operable Unit (OU) 1/OU 2 consolidated treatment plant. Specifically, we proposed eliminating the sampling at the collection well and the french drain for PCB/pesticides and semi-volatile constituents. No significant contamination from these parameters has been detected since April 1992. Further, the OU 1 Interim Measure/ Interim Remedial Action (IM/IRA) does not require these parameters to be monitored in the effluent prior to discharge.

Additionally, we recommended discontinuing sampling at the following surface water locations: SW035, SW036, SW038, and SW070. These locations were originally canceled from the sitewide surface water program and then were included in the OU 1 French Drain Performance Monitoring Plan. While these stations have been sampled as part of the OU 1 IM/IRA performance monitoring, these data have not been reported in the quarterly reports.

We have discussed these proposals with EPA and CDPHE OU 1 representatives at the December 20, 1995 OU 1 Joint Working Group Meeting. Kaiser-Hill discussed that this quarterly sampling would not be conducted in FY1996. However, if EPA and CDPHE had concerns after reviewing the information and still wanted the sampling to be conducted, we would take additional samples at these surface water locations. To date, these samples have not been collected. EPA and CDPHE OU 1 representatives agreed in concept and requested we provide additional information on the surface water sampling. The additional information is provided in Attachment A.

If you are in agreement with this proposal, please sign at the bottom of this letter. If your request any additional information or have any questions, please feel free to contact Dave George at 966-5669.

Sincerely,

Bob April, Group Lead  
Stakeholder and Environmental Liaison Group

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Tim Rehder

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Joe Schieffelin

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Susan Chaki

cc: Gary Kleeman, EPA  
Chris Gilbreath, CDPHE  
Bob April, SEL, RFFO  
Steve Slaten, SEL, RFFO  
Dave George, EAG, RFFO  
Laura Brooks, K-H  
Chris Dayton, K-H  
Steve Hahn, K-H  
Tim Hedahl, K-H  
Karan North, K-H  
George Setlock, K-H  
Dave Shelton, K-H  
Karen Wiemelt, K-H  
Marla Broussard, RMRS  
Russ Cirillo, RMRS  
Susan Evans, RMRS  
Candice Jierre, RMRS  
John Law, RMRS  
Alan Parker, RMRS  
John Schmuck, RMRS  
Ty Vess, RMRS  
Administrative Record

Surface water monitoring is being conducted for the Industrial Area (IA) Interim Measure/Interim Remedial Action (IM/IRA). For the IA IM/IRA, stormwater outfall monitoring stations are located at outfall areas near the 600 and 800 Building complexes. Monitoring at these stations (GS21, GS22, GS23, GS24, and GS25) is performed under the IA IM/IRA. These stations are currently collecting data that provide information about surface water runoff in the vicinity of OU 1 and the area located to the west of OU 1. Monitoring of the overall South Interceptor Ditch water is also done at SW027 immediately upstream from Pond C-2.

The Draft Rocky Flats Cleanup Agreement (RFCA) established the outfall of the C-2 terminal pond as the point of compliance for this area. To obtain stakeholder input and establish an overall coordinated environmental monitoring program, a Data Quality Objective (DQO) Working Group (consisting of regulators, stakeholders, and site personnel) has been formed. The actual surface water sampling locations and analyses will be determined by the group and summarized in an Integrated Monitoring Plan which hopefully be completed this summer.

Given these ongoing efforts and the fact that the results of these data have not been used in proposing the final remedial action for OU 1, we recommend the surface water sampling associated with the OU 1 IM/IRA be discontinued. The DQO process and Integrated Monitoring Plan can identify if there are any sample needs in this area and the proper program can then conduct any necessary sampling.