

STATE OF COLORADO

Roy Romer, Governor
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Dedicated to protecting and improving the health and environment of the people of Colorado

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION
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Colorado Department
of Public Health
and Environment

December 15, 1998

Mr. Joe Legare
RFCA Coordinator
Department of Energy-RFFO
P.O. Box 928
Golden CO 80402-0928

RE: Draft Proposed Action Memorandum for the East Trenches Plume (November 1998)

Dear Mr. Legare:

The Colorado Department of Public Health and Environment (CDPHE) has reviewed the above referenced PAM and has discussed concerns related to the proposed project with representatives of the Department of Energy, its contractors, and the Environmental Protection Agency, which is the lead regulatory agency for this project. These discussions focused on several of the Department's comments on the Draft Conceptual Remediation Design for this project which were not addressed in this PAM. A summary of remaining concerns and their anticipated resolution follows.

The need for this project has not been adequately justified. No surface water samples collected at a POE or POC have exceeded action levels. It is the possibility of future exceedances of surface water standards in the water column after active cleanup that must be prevented. For ground water action level exceedances, RFCA requires an evaluation "to determine if remedial or management action is necessary to prevent surface water from exceeding standards." If Tier I action levels are exceeded in a Tier II well, increased sampling frequency is triggered. If exceedances continue, modeling is required to predict if "surface water action levels will be exceeded in surface water." Still missing from this evaluation are: estimation of the remaining source, calculation of the lifetime of the plume after source removal, and estimation of the concentrations expected over the lifetime of the plume. Characterization data of ground water concentrations in the source area are known and performance monitoring wells are designed to collect information on the remaining plume. The pathway is well enough known that a simple model of this plume can be calibrated and used to predict lifetime and concentration of the plume. CDPHE has committed to perform this modeling with the assistance of technical staff from the Site by December 18, 1998.

Because of current pond management practice, contaminant migration in stream alluvium cannot be documented below pond B3. However, the likelihood of that migration occurring in a future management scenario can be evaluated using known hydrogeologic information. With or without

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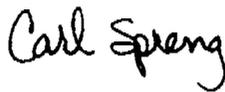
this system, the concentration of volatile organics in the water column will be undetectable most of the time. It is not critical to know if contaminants are transferred to the surface water, but rather if they persist, and if the plume is expanding downstream in the alluvium.

Stakeholders should be provided with information to weigh the cost benefits of the project in the context of long-term stewardship of the site. This information cannot be provided without an estimate of how long this plume will continue to discharge to the South Walnut Creek drainage and without establishing performance requirements for the system. If the lifetime of the plume is modeled to exceed the period of active remediation at the Site, then this document should address the issue of continued funding for the maintenance and operation of the remedial system.

Comments regarding construction issues were also not addressed in this document. Trenching on a hillside with known slumping during the highest ground water period of the year is questionable. Issues related to how the project may affect mouse habitat are also unresolved and may greatly restrict installation techniques and schedule.

If you have any questions concerning this document, please contact me at 303-692-3358 or Elizabeth Pottorff at 303-692-3429.

Sincerely,



Carl Spreng
Corrective Action Unit
Federal Facilities Program

cc: Norma Castañeda, DOE-RFFO
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