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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

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Ref: 8EPR-F

SEP 20 2001

Ms. Norma Castaneda
Department of Energy
Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

Re: Sampling and Analysis Plan for Groundwater Monitoring of the Industrial Area Plume

Dear Ms. Castaneda:

EPA has reviewed the above referenced document and has the following comments and suggestions for improvement.

- Overall review of the proposed monitoring locations would be much easier to assess if the new well locations were included on the chemical concentration maps that delineate the groundwater plumes according to current data.
- Section 2.4 states that the wells will be sampled once, and then frequency will be reassessed. This is not sufficient. All of the wells, existing and new, must be sampled at least twice in the first year in order to account for changing conditions throughout the year before making additional assessments for further sampling.
- The sudden, two order magnitude increase of PCE in well 10498 is highly unusual and should at least be investigated with a new well in closer proximity to it than the proposed location for 84201. This well location is much too far east to be of much value by itself, but could provide useful information in conjunction with a well located in line, and between buildings 441 and 443. The unusual nature of the increased PCE concentration in 2/2000, followed by a virtual nondetect in 8/2000, and then by high concentrations again in Jan/2001 should trigger a greater investigation of the possible causes of this contaminant. The characterization of UBC at building 123 may have ruled out some possible sources, but it may have also somehow altered the hydrogeology of the area.
- Well 84001 appears to be located too far north to evaluate whether the process waste line along the north side of Sage Ave. is the source of contamination in

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wells P114789 and P114689. It could provide information regarding the downgradient extent of this contamination however. The subject waste line should be shown in this document for better understanding of its relationship to the contamination.

- Figure 2-10, depicting Saturated Thickness of Unconsolidated Alluvial Deposits is contoured in a manner that seems unsupported by the data presented. Numerous closed contours surround one or two locations without sufficient nearby data to justify this depiction. If this is a computer generated map, it could be better drawn by hand, using professional judgement to present a more likely scenario.

Overall, EPA agrees with the proposed sampling and analysis plan, but the above mentioned items are areas where improvement could be realized. If you have any questions regarding these matters please contact Gary Kleeman at 303 312-6246.

Sincerely,



Tim Rehder
Rocky Flats Team Leader

cc: Elizabeth Pottoroff, CDPHE
Steve Gunderson, CDPHE
Joel Sobol, KH
Steve Singer, KH



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