



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2486

Ref: 8HWM-FF

APR 21 1992

Mr. Frazer Lockhart
Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, CO 80402-0928

re: OUI (881 Hillside) IM/IRA

Dear Mr. Lockhart:

EPA and CDH received two documents pertaining to Operable Unit 1 (the 881 Hillside) on April 13, 1992: the French Drain Monitoring Plan and draft Habitat Mitigation Plan. This letter will address the French Drain Monitoring Plan and a subsequent letter will provide our comments on the draft Habitat Mitigation Plan.

Although the monitoring plan is generally acceptable, there are some corrections and additions to the document itself that should be made prior to final approval. Most importantly, the complete rationale needs to be stated for constructing only 1450' of the drain instead of 2100' as called for in the January 1990, IM/IRA Decision Document. The following statements pertain to shortening the west end of the drain by 500' and should be included in section 1.4 IM/IRA OVERVIEW for the record:

- 1) Groundwater that would have been collected from station 5+00 to station 0+00 is not anticipated to be contaminated, based on recent sampling and flow modeling;
- 2) Inclusion of this clean water would significantly dilute contaminated waters collected by the drain, resulting in less effective removal of contaminants by the treatment plant;
- 3) Further construction would encounter saturated conditions that would exacerbate slumping of the hillside, jeopardizing the safety of workers and putting dangerous geotechnical stresses on the gas transmission line.

Other comments are as follows:

- Figure 1-3 was not corrected from the draft version and contains several errors. Since it does not contain any information that is not shown in figure 2-1, it should probably just be deleted and the references to it

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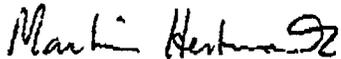
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should be changed.

- Proposed and actual construction stations from 0+00 to 19+35 should be depicted either on figure 2-1 or another map on 100' intervals.
- Text on page 2-1 states that all new wells will be between the french drain and the SID, but well FD07B is shown on figure 2-1 to be on the south side of the SID. Its location should be clarified.
- Well FD06C appears to be located 100'-150' west of the optimum location necessary to intercept the bedrock sand encountered during construction. At the April 9 meeting, it was stated that this sand was encountered between stations 10+50 and 11+10.
- Table 2-2 indicates that no glide planes were detected at the proposed location for well FD08B. This well should either be relocated or better justification should be provided for this location.
- During our inspection of April 8, well 36491 was not found and was probably destroyed during construction. Please confirm its status and correct figure 2-1 if necessary.
- Aerial photographs from 1988 show three outfalls in the vicinity south of building 850 and its parking lot. If this is still the case, gauging stations and automatic samplers should be installed in all three channels rather than two as stated in the plan.

In summary, EPA and CDH are approving the French Drain Monitoring Plan on the condition that the above additions and comments are satisfactorily addressed in the document. If you have any questions, please contact Gary Kleeman (EPA) at 294-1071 and/or Joe Schieffelin (CDH) at 331-4421.

Sincerely,



Martin Hestmark, EPA
Manager
Rocky Flats Project



Gary Baughman, CDH
Unit Leader
Hazardous Waste Facilities

cc: Scott Grace, DOE
Cindy Gee, EG&G
James K. Hartman, DOE