

United States Government

Department of Energy

memorandum

Received
6-25-92

RECEIVED
U.S.D.O.E.
R.F.O. - MAIL ROOM

1992 JUN 22 A 7 36

DATE: JUN 11 1992

REPLY TO: EM-453 (A. Rampertaap, 3-8191)

ATTN OF: Comments on the Final Interim Measure/Interim Action French Drain
SUBJECT: Performance Monitoring Plan, Operable Unit 1

TO: Frazer Lockhart, Rocky Flats Office

The Office of Southwestern Area Programs, Rocky Flats/Albuquerque Production Division (EM-453), has reviewed the above-referenced document and is providing the attached comments. Please address these comments before the document is finalized.

Our most significant concern is that the analytical program appears extensive for the primary objectives of this plan, evaluating the effectiveness of the French Drain. A specific analyte list could be used to detect any problems, instead of full suite analysis. This would reduce the cost of the analytical program.

Call me at 301-903-8191 if you have any questions related to this request.

Autar Rampertaap

Autar Rampertaap
Rocky Flats/Albuquerque Production Division
Office of Southwestern Area Programs
Environmental Restoration

Attachment
cc w/attachment:
B. Magee, HAZWRAP

cc w/o attachment:
R. Greenberg, EM-453
J. Hartman, RF

845-6127

4580

5745
20

ADMINISTRATIVE

A-OU01-000862

**EM-453 COMMENTS ON: FINAL INTERIM MEASURE/INTERIM
REMEDIAL ACTION FRENCH DRAIN PERFORMANCE MONITORING PLAN
OPERABLE UNIT 1**

GENERAL COMMENTS:

1. The purpose of wells being installed for this program are not the same as those for site characterization. This difference should be noted, and appropriate changes made to the common well design, such as screening depths based on depth of the French Drain, as well as depth to bedrock.
2. The water sampling at the Building 850 west parking lot is not related to French Drain performance. This sampling effort should be placed in the sitewide surfacing water monitoring program. Also, no explanation has been provided as to why this water run-off from this parking lot is of concern.
3. The Quality Assurance/Quality Control (QA/QC) program for this effort is vague. This plan should provide the specific QA/QC procedures that will be followed, not suggestions.

SPECIFIC COMMENTS:

1. Section 1.5, p. 1-8, second paragraph: Provide information on the West Parking Lot of Building 850. No information has been provided to explain why this area is of concern.
2. Section 2.1.1, p. 2-1, second paragraph: The purpose of wells FD02A, FD03A, FD06A are related to the potential that the French Drain is not keyed into bedrock in that section. The depth of these wells should then be related to the depth of the French Drain, and the depth to bedrock, because the concern appears to be that water would be able to go under the drain.
3. Section 2.1.1, p. 2-4, third paragraph: The concern of the glide planes would be that they originate up-hill from the drain, and propagate below the depth of the drain, therefore the drain would not intersect the glide plan, or would the glide planes be filled with grout. The bedrock wells would then need to be screened below the known occurrence of the glide planes to intersect the ones of concern.
4. Section 2.1.3, p. 2-6, first paragraph: Please explain why sampling every well, every quarter, and why water level measurements are being taken weekly.

5. Section 2.2, p. 2-7: Provide a rationale for sampling at the three locations specified, and a schedule for sampling, i.e., once a week, quarter, year, etc.
6. Section 2.3, p. 2-8: Please clarify, if this program is separate from the site-wide surface water program, or will information from the site-wide surface water program be used.
7. Section 2.4, p. 2-9: There does not appear to be any reason to conduct Target Compound List analysis for this program. Specific indicator parameters should be determined (TCE, gross alpha/beta) and those used to evaluate if the French Drain is working. If test results indicate problem then full suite analysis could be done.
8. Section 2.4, p. 2-10, third paragraph: The Quality Control sampling program should be specific, not suggestions. Also, clarify the use of duplicate, and replicate, they do not mean the same thing.
9. Section 2.4, p. 2-10, fourth paragraph: Trip blanks are only used for volatile organic analysis.
10. Section 2.4, p. 2-15, second paragraph: This paragraph conflicts with the information provided in section 2.1.3, p. 2-6, first paragraph. Explain the analytical sequence consistently throughout the text. Also, explain why well WM-2 is excluded from the monthly sampling.
11. Appendix B: Provide a map showing the locations of the test stations.