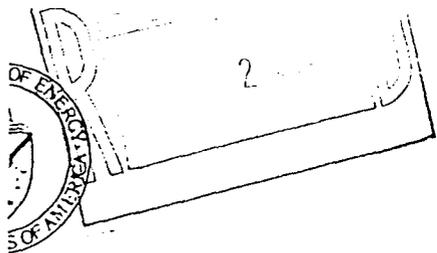


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Department of Energy

ROCKY FLATS OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

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ROCKY FLATS OFFICE
CORRESPONDENCE

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HUBERT, A.L.		
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GER, S.G.	X	
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ORHEIS, G.M.		
SON, J.M.		
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RILO, J.R.	X	
ROUSSARD M.C.	X	

Mr. Martin Hestmark
U. S. Environmental Protection Agency, Region VIII
ATTN: Rocky Flats Project Manager, 8HWM-RI
999 18th Street, Suite 500, 8WM-C
Denver, Colorado 80202-2405

Mr. Gary Baughman
Hazardous Waste Facilities Unit Leader
Colorado Department of Health
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Gentlemen:

Our letter of May 11, 1994, (Ref: 94-DOE-05368) submitted a proposal and report titled "Water Quality Evaluation of Building 881 Footing Drain Discharge with Recommendation for Discontinued Treatment". This document was developed to propose disconnecting the Building 881 Footing Drain as a source to the French Drain and treatment in the Operable Unit No. 1 (OU 1) Interim Measures/Interim Remedial Action (IM/IRA) facility, and releasing it directly to the South Interceptor Ditch which flows into Pond C-2.

Since submitting this proposal, your staff has taken an independent confirmation sample from the 881 Footing Drain. Your staff has indicated that results from the analyses for volatile organic carbon compounds (VOCs) and for metals basically corroborates the findings documented in our report. We understand that you are still awaiting results from the laboratory to confirm/corroborate our data presented for radionuclides (RADs).

The purpose of this letter is to request that you grant approval for disconnection of this source now. This continuation would be conditional upon the results from your confirmation sample, as was recently done for the OU 2 Surface Water IM/IRA. We feel that this request is justified and appropriate for the following reasons:

- The report submitted with this proposal documents analytical data obtained from this source since November 1987; it concluded that this water is not contaminated, and exhibits a low frequency and magnitude of data exceeding "potential" Applicable or Relevant and Appropriate Requirements (ARAR). The report compares ARAR's from the Interim Remedial Action Plan (IRAP) for OU 1 and to future "potential" ARAR's, which include "potential" Segment 5 Stream Standards as were adopted by the State of Colorado.
- The Footing Drain is the major influent source to the French Drain and the IM/IRA water treatment facility. This water effectively dilutes other contaminated ground water collected by the drain and obtained from the existing collection well at Individual Hazardous Substance Site (IHSS) 119.1. This dilution prohibits an evaluation of the effectiveness of the French Drain and the Water Treatment Facility in treating the ground water at OU 1. This evaluation would aid our Corrective Measures Study/Feasibility Study (CMS/FS) which is currently being conducted.

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Reviewed for Addressee
Corres. Control RFP

7/21/94
DATE BY

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- Treating this water results in a large and unneeded cost for this facility. As outlined in the report, the cost of operating and maintaining the OU 1 treatment facility is approximately \$1 million per year.

As discussed above, we again request approval for the disconnection of this drain. If you have any questions regarding this material or you require additional copies of the Footing Drain Report for review by your staff, please contact Scott Grace at 966-7199.

Sincerely,



Steven W. Slaten
IAG Project Coordinator

cc:
A. Rampertaap, EM-453, HQ
F. Lockhart, ER, RFFO
S. Grace, ER, RFFO
T. Reeves, AEI, RFFO
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M. Broussard, EG&G
G. Kleeman, EPA
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