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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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

Ref: 8EPR-F

MAY 3 1986

Mr. Steven W. Slaten
Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE: Operable Unit 1 Proposed Plan

Dear Mr. Slaten:

EPA has reviewed the OU 1 Proposed Plan that was faxed to this office on April 29, 1996 after revisions that we had discussed were made to the document. Overall, the document adequately explains and evaluates the remedial alternatives considered for OU 1. Therefore, EPA approves this version of the Proposed Plan so that it may be released for public comment.

Nevertheless, EPA is concerned that DOE is basing it's estimated area and volume of excavation almost entirely on the most recent soil gas survey that was conducted in February 1996. We are not convinced that this survey extended far enough downgradient from the presumed point of release to determine the extent of the subsurface solvent sources that are contaminating groundwater at OU 1. Two wells downgradient of the surveyed area have concentrations that are known to be 100 times greater than MCLs, so it is quite possible that the solvents have migrated down paleochannels to locations that would be outside the estimated excavation area. In order to better characterize the extent of the contaminant sources, it will be necessary to conduct further soil gas surveying or split-spoon sampling of subsurface soils approximately 100 feet further downgradient.

The cost of this remedial action is highly dependent on the volume of soil that is excavated due to necessary treatment and/or disposal, but the action can only be successful if most of the contaminant source is removed from the subsurface. EPA would like to meet with DOE and CDPHE to discuss how this additional characterization might be best implemented.

If you have any questions regarding this matter, please contact Gary Kleeman at 312-6246.

Sincerely,

Tim Rehder
Tim Rehder, Manager
Rocky Flats Project

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cc: Dave George, DOE
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