



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION VIII
 999 18th STREET - SUITE 500
 DENVER, COLORADO 80202-2466

Chris - FYI

R/CA
 EPA
 Corresp

AUG 27 1997

Ref: 8EPR-F

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

Re: Modification to OU 1 IM/IRA

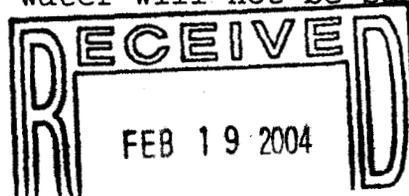
Dear Mr. April:

EPA has reviewed the proposed modification to the Operable Unit 1 Interim Measure/Interim Remedial Action (OU 1 IM/IRA) and finds it to be generally acceptable with the exception of the items that are discussed below.

Attachments 1 and 2 state that the OU 1 ROD calls for the collection well and French drain to be dismantled and removed from service. Actually the OU 1 ROD states that the French Drain was to be dismantled after contaminated groundwater was pumped from the excavation. Since the excavation was not performed, the contaminated groundwater that would have been removed is still present and therefore, it should continue to be pumped by the collection well and treated in the Consolidated Water Treatment Facility (CWTF). As stated in our letter of July 7, 1997, EPA also recommends that the French Drain not be dismantled at this time, but retained for its value as a groundwater barrier that could be useful in the future if contaminants are released in the industrial area upgradient of Operable Unit 1. However, collection and treatment of groundwater from the French Drain is no longer necessary. As long as it is sampled and shown to meet the RFCA Action Levels, water from the French Drain could be directly discharged to the South Interceptor Ditch. The modification being prepared for the OU 1 ROD should clarify the future use of the collection well and the French Drain, and the attachments should be changed to agree with it.

The CWTF Sampling and Analysis plan states that the Main Decontamination Facility waters, Protected Area decontamination waters, and groundwater purge water will not be sampled prior to

DOCUMENT CLASSIFICATION
 REVIEW WAIVER PER
 CLASSIFICATION OFFICE



ADMIN RECORD
 OOU1-A-001434

Printed on Recycled Paper

treatment because several years of historic sample results show that these waters are within acceptable treatment limits for the CWTF. Since this data has not been previously provided to EPA, it should be summarized and presented in tables that list the contaminants that are detected in these waters with the mean and maximum concentrations for each general group of water. If these waters are typically shown to not have any contaminants, sampling them might be more cost effective than treating without sampling.

Footnote 3 to Table 3-1 states that analysis for water from SW059, SW060, and SW061 may include several radionuclides. What is the basis for determining which analyte will be included? Unless a good decision rule can be developed to determine which analytes will be included, analysis of all of the listed radionuclides should be done for this set of influent water.

The proposed action levels listed in Appendix A for the CWTF are greater than the RFCA surface water action levels for the following analytes: aluminum, antimony, beryllium, cadmium, copper, arochlor-1221, acrolein, acrylonitrile, and cyanide. Appendix A should be changed so that it matches the RFCA action levels for all analytes.

If you have any comments or questions, please contact Gary Kleeman at 312-6246.

Sincerely,



Tim Rehder, Manager
Rocky Flats Project

cc: Norma Castenada DOE
Carl Spreng, CDPHE
Jennifer Uhland, Kaiser-Hill
Steve Slaten, DOE

