



Department of Energy

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Mr Gary Baughman
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Gentlemen

We are transmitting the Responsiveness Summary (RS) on the September 26, 1990, proposed document entitled "Surface Water Interim Measures/Interim Remedial Action Plan and Proposed Decision Document for 903 Pad, Mound, and East Trenches Areas, Operable Unit 2, U S Department of Energy, Rocky Flats Plant, Golden, Colorado" (IM/IRAP) We are submitting the RS pursuant to the draft Environmental Restoration Federal Facility Agreement and Consent Order (known as the Environmental Restoration InterAgency Agreement, IAG) which specifies submittal of the RS by December 13, 1990 Also discussed in this letter is a proposal to defer treatment proposals for the 903 Pad area seeps and then requiring amendment of the IM/IRAP at a later time

On September 18, 1990, we submitted the draft proposed IM/IRAP for your review and comment prior to release to public comment As a result of your comments, the IM/IRAP was modified and then issued for public comment on September 26, 1990 The public comment period for the IM/IRAP closed November 24, 1990

Comments were very helpful, but indicated significant concerns with several fundamental plan elements Based upon the various comments received, it has become clear that we need to rethink our approach for treatment of the seeps in the vicinity of the 903 pad area (Woman Creek) Concerns identified include bench scale treatability testing being conducted prior to field treatability testing, inter-basin transfer of water from Woman Creek drainage to the South Walnut Creek drainage basin, discharge of treated water into drainage basins, and resuspension (in water as well as air) of plutonium contaminated soils during excavation These are significant issues which cannot be resolved quickly in a responsible manner As a result, we propose to proceed with the South Walnut Creek portion of the IM/IRAP and reconsider the proposed IM/IRAP treatment for the 903 pad area seeps

We are proposing to maintain the original schedule on the South Walnut Creek portion of the IM/IRAP (including the field treatability testing) We would then propose a schedule for the Woman Creek portion as an addendum to the IM/IRAP Consideration in the addendum will be for conducting bench scale treatability tests (as you know, we have been unable to do meaningful bench scale testing of the 903 pad area seeps due to insufficient seep flow) Flow with sufficient radionuclide concentrations is not expected until Spring At that time we should be able to collect

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water and conduct bench scale tests We tentatively propose a June/July 1991 timeframe for submittal of an addendum to the IM/IRAP which would consider treatment alternatives and water management alternatives (recycling) One such alternative may be modifying the 881 Hillside IM/IRAP treatment facility to treat the water from 903 pad area seeps Other alternatives will also be explored

Another consideration in the (tentative June/July 1991 addendum) would be consideration of adding Surface Water station 21 to the IM/IRAP The current IM/IRAP, Section 2 2 3 1, was discovered to be incorrect in describing the sources of the culverts (the corrugated culvert, SW-60 and the un-numbered concrete culvert) from under the PSZ SW-21 is the outflow of South Walnut Creek under the PSZ, rather than SW-60 SW-60 drains surface water flow from south of the PSZ The limited data from SW-21 does indicate volatile organic contamination. Therefore, inclusion of SW-21 will be evaluated and included in the finalized IM/IRAP/EA

As per the IAG, we expect to receive your comments on the Responsiveness Summary by December 20, 1990 As specified in the detailed schedules to the IAG, on January 11, 1991, we will submit the finalized Responsiveness Summary as well as a finalized IM/IRAP/EA for the South Walnut Creek collection and treatment. Finalization and your approval of the Responsiveness Summary and the IM/IRAP/EA is scheduled for January 14, 1991, with the ten-day public availability January 28 through February 8, 1991 DOE-HQ is scheduled to finalize their NEPA determination by February 8, 1991 Construction activities for the first phase (installation of granulated organic carbon units) of South Walnut Creek (SW-59 and SW-60) portion of the IM/IRAP are scheduled to commence February 11, 1991, and field treatability testing in South Walnut Creek March 11, 1991 As has been discussed with you, we propose to discuss details for our request for deferral of the Woman Creek drainage basin portion of the IM/IRAP on December 18, 1990

We request that you copy cover Scott Grace on future correspondence and telefax copies of your comments on the RS directly to Scott Grace at telefax number 966-2256 Should you have any questions, please feel free to contact Scott Grace of my staff at 966-7199

Sincerely,



David P Simonson, Assistant Manager
for Environmental Management

Enclosure

cc w/o enclosure
T Olsen, DOE/RF
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