



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2405

JAN - 9 1990

Ref: 8HWM-FFRB

Mr. David P. Simonson, Manager
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE: Draft Proposed IM/IRA
Medium Priority Sites,
OU 2

Dear Mr. Simonson:

Enclosed are EPA's comments regarding the Draft Proposed Interim Measure/Interim Remedial Action (IM/IRA) Decision Document for the Medium Priority Sites (903 Pad, East Trenches and Mound Areas). This document addresses OU 2 through the draft Inter-Agency Agreement (IAG) for cleanup activities at Rocky Flats. The enclosed comments were discussed and presented to DOE and EG&G representatives during a January 8, 1990 meeting regarding the IM/IRA for OU 2.

As a result of discussions during the January 8, 1990 meeting, it is apparent that all parties are concerned with regard to the preferred option presented in the draft proposal. Presently, this OU is difficult to address on an interim basis due to the lack of comprehensive quality data characterizing the nature and extent of contamination. It is uncertain whether the most probable imminent threat, the alluvial groundwater system, can be effectively addressed at this time.

EPA and the Colorado Department of Health (CDH) have discussed the decision document and the enclosed comments. CDH has forwarded their comments under a separate cover letter. DOE and its contractors need to modify the decision document after considering the enclosed comments, CDH's comments and the concerns expressed during the January 8, 1990 meeting. DOE and its contractors should present information in the IM/IRA decision document which expands the number of options available for an IM/IRA at OU 2.

EPA suggests consideration, as an option, postponing ground water action at present, while implementing surface soil remedial action. DOE should expand the bedrock ground water remedial option to include an assessment of the impacts to the alluvial ground water (DOE could also evaluate the option of surface soil remedial action in conjunction with ground water remedial action).

ADMIN RECORD

EPA Also suggests that, under the draft proposed preferred option, in addition to alluvial well 42-86, alluvial well 35-86 be manifolded into the collection and treatment system chosen. Another concern, which needs to be addressed, is the potential for radioactive particulate resuspension due to construction activities and past disposal practices.

A representation of the risks associated with initiating any action, and waiting for further, more conclusive, information should be presented in the IM/IRA. Also, further information regarding the feasibility of utilizing UV/Peroxide in conjunction with Ion Exchange rather than Granulated Activated Carbon systems to treat contaminated water are needed.

It has come to EPA's attention that the facility continues to utilize the East Spray Fields (IHSS Nos. 216.2 & 216.3) for land application of liquids from the sewage treatment plant. These Individual Hazardous Substance sites (IHSSs) are contained in Draft IAG and scheduled for assessment under OU 4, yet are considered in the IM/IRA for OU 2. Continued application of liquids from the sewage treatment plant on this area greatly increases the potential for migration of any contaminants which may be present at these sites. Also, EPA is concerned about the area of influence from these IHSSs. Further discussion is needed regarding the continued use of these units and which operable unit they should be investigated under.

If you have any concerns regarding the enclosed comments, please contact Nat Miullo at (303) 293-1668, or Martin Hestmark at (303) 293-1506.

Sincerely yours,



Robert L. Duprey, Director
Hazardous Waste Management Division

ENCLOSURE

cc: w/ encl.

David C. Shelton, CDH
Patricia Corbetta, CDH
Tom Olsen, DOE
Tom Greengard, EG&G ✓
Terry Ruitter, PRC