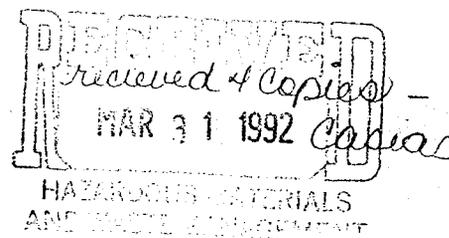




Department of Energy

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

MAR 30 1992



92-DOE-3408

Mr. Martin Hestmark
U.S. Environmental Protection Agency, Region VIII
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999 18th Street, Suite 500, 8WM-C
Denver, Colorado 80202-2405

Mr. Gary Baughman
Hazardous Waste Facilities Unit Leader
Colorado Department of Health
4210 East 11th Avenue
Denver, Colorado 80220

Gentlemen:

We are transmitting copies of the document entitled "Draft Summary and Analysis of Results, Field Treatability Study, Granulated Activated Carbon Treatment System, South Walnut Creek Basin, Surface Water Interim measure/Interim Remedial Action, Operable Unit 2." This document is due April 1, 1992 as per the dispute resolution on the OU2 South Walnut Creek Interim Measure/Interim Remedial Action (IM/IRA) which requires submittal of the subject document.

DOE has the following comments on the EG&G prepared document:

- 1) It should be noted that the current version of "sitewide" potential chemical-specific benchmarks differ from the proposed ARAR in original Walnut Creek IM/IRAP. For example, the constituent 1,2 - Dichloroethene (1,2 - DCE) has a value of 5 ug/l in the current benchmark document submitted recently while it was listed as a TBC of 1 ug/l in the IM/IRAP.
- 2) The discussions in the document should be directed more to attainment of potential ARARs. For example, the current benchmark for 1,2 - DCE is 5 mg/l. During the period of performance, the "potential" ARAR of 5 for 1,2 - DCE was exceeded in the influent in 36 of the 40 analysis and exceeded in the effluent in 8 of the 40 analysis.
- 3) The document should also include discussion of quantity and quality from the collection sources, SW-59 and SW-61. Because of the overall low concentrations of contaminants, it may be possible to determine that concentrations exceeding the potential ARAR are from SW-59 rather than SW-61 (or SW-132). If so, this document should recommend collection from SW-59 only, in order to conduct meaningful treatability testing of the GAC and of the metals/Radionuclide Removal System (RRS), when operational in April 1992. Otherwise, and in particular, the low concentration of radionuclides will make testing inconclusive.

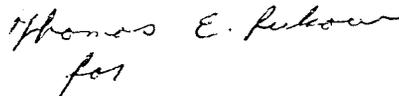
MAR 30 1992

- 4) The document should also explicitly state that potential ARARs were exceeded in the effluent analysis 1 of 41 times for both Trichloroethene and Tetrachloroethene; and 5 out of 5 times for aluminum and antimony.
- 5) The document should contain a discussion of occurrence of vinyl chloride because it was a concern to the regulators.
- 6) The document should provide possible explanations for the reason that "VOC contamination is less than was anticipated" by the IM/IRAP and the work plan.
- 7) The Appendix A to the document should have a column listing the ARAR for each chemical constituent.

These comments will be addressed in the finalization of the document along with EPA's and CDH's.

If you have any questions, please contact Scott Grace of my staff at 966-7199.

Sincerely,



James K. Hartman
Acting Assistant Manager
for Environmental Management

Enclosure

cc w/Enclosure:

A. Rampertaap, EM-453

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