

CORRES. CONTROL
INCOMING LTR NO.

925 RF 22

DUE
DATE



Department of Energy

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

MAR 30 1992

92-DOE-3409

ROCKY FLATS PLANT
EG&G
CORRESPONDENCE CONTROL

Apr 1 8 46 AM '92

ACTION	DIST.	LTR	ENC
	BENJAMIN, A.		
	BERMAN, H.S.		
	BRANCH, D.B.		
	BURLINGAME, A.H.		
	CARNIVAL, G.J.		
	COPP, R.D.		
	CROUCHER, D.W.		
	DAVIS, J.G.		
	EVERED, J.E.	X	
	FERRERA, D.W.		
	GOODWIN, R.		
	HANNI, B.J.		
	HEALY, T.J.		
	HILBIG, J.G.		
	DEKER, E.H.		
	KERSH, J.M.	X	
	KIRBY, W.A.		
	KRIEG, D.		
	KUESTER, A.W.		
	LEE, E.M.		
	MAJESTIC, J.R.		
	MARX, G.E.		
	MORGAN, R.V.		
	PIZZUTO, V.M.		
	POTTER, G.L.		
	SANDLIN, N.B.		
	SMITH, R.L.		
	TAN, M.T.		
	TONSON, E.R.		
	TUNNAN, K.G.		
	WIEBE, J.S.		
	WILKINSON, R.B.		
	WILSON, J.M.		
	YOUNG, E.R.		
	ZANE, J.O.		
	<i>Dortius D</i>	X	
	<i>George P</i>	X	
	<i>Indenby RA</i>	X	

Mr. John Wegrzyn
U.S. Fish & Wildlife Service
Colorado State Office
730 Simms Street
Golden, CO 80401

Dear Mr. Wegrzyn:

The U.S. Department of Energy (DOE) is hereby transmitting one (1) copy 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 to EPA and CDH on April 1, 1992. Please provide any comments related to your role as a Natural Resource Trustee by May 1, 1992.

This document is a requirement of the Rocky Flats Interagency Agreement between DOE, the Colorado Department of Health and Environmental Protection Agency. We are providing this document in an effort to seek coordination and cooperation with the Natural Resource Trustees as required by CERCLA Section 104 (b) (2).

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.
- 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.

CORRES CONTROL
TRAFFIC

Reviewed for Addressee
Corres. Control RFP
4-1-92 *cm*

DATE BY
Ref Ltr. #

ADMIN

MAR 30 1992

- 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 there are any questions or concerns regarding the enclosed document, please contact Scott Grace of my staff at 966-7199.

Sincerely,

James K. Hartman
for

James K. Hartman
Acting Assistant Manager
for Environmental Management

Enclosure

cc w/o Enclosure:

- A. Rampertaap, EM-453
- B. Thatcher, ERD, RFO
- D. Pontius, EG&G
- M. Hestmark EPA
- G. Baughman, CDH

Identical letters were sent to the following, dated MAR 30 1992

Dave Weber, Colorado Division of Wildlife

Pat Rogers, Colorado Geological Survey

Steve Arnold, Colorado Department of Health