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CORRES. CONTROL
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Department of Energy

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

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DATE

ACTION

EG&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

DEC 06 1994

94-DOE-12380

DIST.	LTR	ENC
BURLINGAME, A.H.		
BUSBY, W.S.	X	
CARNIVAL, G.J.		
CORDOVA, R.C.		
DAVIS, J.G.		
FERRERA, D.W.		
FRAY, R.E.		
GEIS, J.A.		
GLOVER, W.S.		
GOLAN, P.M.		
HANNI, B.J.		
HEALY, T.J.		
HEDAHL, T.G.		
HILBIG, J.G.		
HUTCHINS, N.M.		
JACKSON, D.T.		
KELL, R.E.		
KUESTER, A.W.		
MARX, G.E.		
McDONALD, M.M.		
McKENNA, F.G.		
MORGAN, R.V.		
PIZZUTO, V.M.		
POTTER, G.L.		
SANDLIN, N.B.		
SATTERWHITE, D.G.		
SCHUBERT, A.L.		
SCHWARTZ, J.K.		
SETLOCK, G.H.		
STIGER, S.G.		
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Mr. Martin Hestmark
U. S. Environmental Protection Agency, Region VIII
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Mr. Joe Schieffelin, Unit Leader
Hazardous Waste Facilities
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Gentlemen:

Our November 9, 1994 letter (94-DOE-11240), notified you that the Operable Unit 2 (903 Pad, Mound, and East Trenches; OU 2) Subsurface Interim Measures/Interim Remedial Action (IM/IRA) schedules and milestones were at risk. This is due to the recent characterization sampling in Individual Hazardous Substance Site (IHSS) No. 110, where free phase Non-Aqueous Phase Liquids (NAPL) with high radionuclide activity were discovered. The IHSS 110 is where we are currently conducting post-pilot Soil Vapor Extraction (SVE) operations.

Rather than continuing post-pilot SVE operations at IHSS 110, we feel it appropriate to resurrect the expedited action that was planned for IHSS 110 earlier this year. The expedited action for IHSS 110 was deferred because we had planned to conduct six-phase soil heating as test 2 under the IM/IRA (see April 29, 1994; 94-DOE-04810). Consequently, we are stopping post-pilot SVE operations at IHSS 110, effective December 16, 1994. The basis for our decision to stop post-pilot SVE operations is Table 4-3 of the Subsurface IM/IRA Decision Document. This table is the observational approach matrix that allows post-pilot operations to not be conducted if the operations are not deemed to be beneficial. It is not beneficial, nor technically defensible, to continue SVE operations with the surface source (free phase liquids in the trench) remaining. Rather, it is technically beneficial to deal with the source (IHSS 110) first, then reconsider SVE for the subsurface. That is why we are planning to conduct an accelerated action that would address source control.

Because of the complexity of this situation (i.e., NAPL material with high radionuclide activity), we must carefully consider alternatives for control of this source. We plan to consider alternatives for remediation of this source as an accelerated action, that would most likely be implemented under the Proposed Action Memorandum process. We would like to meet with you in the near future to discuss the accelerated action.

CORRES. CONTROL	X	X
ADMN RECORD/080	X	2
PATS/T130G		

Reviewed for Addressee
Corres. Control RFP

12-7-94
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DOE ORDER # 54021

M. Hestmark & J. Schieffelin
94-DOE-12380

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DEC 06 1994

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

Sincerely,



Steven W. Slaten
IAG Project Coordinator
Environmental Restoration

cc:

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