

Colorado Department of Health  
Hazardous Materials & Waste Management Division

Comments

on

FINAL

PHASE II RFI/RI WORK PLAN

OPERABLE UNIT NO. 4

SOLAR EVAPORATION PONDS

U. S. DEPARTMENT OF ENERGY

ROCKY FLATS PLANT

SEPTEMBER, 1994

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General Comments: Concern has been expressed regarding the potential for cross-contamination of surficial and subsurface soils to ground water. Accordingly DOE may need to take steps beyond those set forth in SOPs GT 04 and GT.06 to minimize impacts to ground water. This concern reflects DOE's opinion that boundary wells along Indiana Street may have been cross-contaminated during construction and do not represent actual ground water contamination.

The RFETS Well Evaluation Report indicates that a number of wells in the area of OU-4 are going to be stepped down to a semi-annual basis. If OU-4 management is depending on data from sitewide monitoring activities, please coordinate requirements of the FSP with those responsibility for the monitoring program.

SPECIFIC COMMENTS:

Figure 3.3-6: The well depicted in this figure is 3887 not 3877. See reference to the figure on page 3-31.

Figure 3.3-20: The legend suggests that Pond 207-A is depicted twice. Was the darkened symbol intended to be for Pond 207-C?

Section 3.3.2.5: The Division questions the interpretation that Lower HSU Well 2586 is upgradient of the SEPs. Figure 3.3-8 which depicts the potentiometric surface for weathered bedrock indicates that Well 2586 is down gradient or lateral to Pond 207A. What is the basis for stating that the well is upgradient and therefore not contaminated by the SEPs?

ADMIN RECORD

Section 3.3.1.1: The term "bedrock channel", based upon the discussions in the first and second paragraphs of page 3-31, appear to be used interchangeably to describe both geologic and paleotopographic features. Please ensure that future references, particularly in the Phase II Report, properly and clearly distinguish the terms

Section 3.3.4.1: Section 2 2 describes North and South Walnut Creeks as intermittent streams generally flowing only after precipitation or snowmelt events. This section suggests that the streams are perennial in nature

Section 3.4.3.1: The Division believes that linking VOC contamination in Well 3586 to the SEPS, although possible, is unrealistic given the distance (1000 feet), negative indications of VOCs based on SEP process knowledge, intermediate wells that showed no VOCs for the period or which may have been dry, the eastward thinning of the alluvial cover, and the probability that the well was completed in Walnut Creek colluvium with a potential disconnect from the Rocky Flats Alluvium

Section 3.4.3.3: Metals: An additional potential explanation for the anomalous metals concentrations is natural occurrence differing from the background area wells. Operable Unit 6 in the identification of COCs (TM-4) has suggested that manganese and associated metals are responsible for elevated metals in the ground water

Figure 3.5-1: Source should include Pond Liners Transport Contaminant Process should include Pumping Receptors should say Hypothetical Resident (including Ground Water use) Exposure should include ionizing Radiation

Figure 3.5-2: The figure should reflect the changes and additions noted for Figure 3 b-2

Section 3.5.5: Potential receptors also must include on-site residents. The baseline risk assessment must reflect the potential for residential inhalation of and dermal contact with surficial soils and subsurface soils excavated for basements (scattered upon the ground surface providing comparable exposure). Additionally dermal contact, inhalation of vapor and ingestion of ground water must be considered

Table 3.6-1: The "X" for Define Contaminant Sources under the column Phase I RFI/RI is misplaced

Table 5.2-1: Please verify that the location for SED-C is in the appropriate location. SW-B is intended to assess water quality for the B779 Area Drain. Therefore, should SED-C be located at the site of SW-B? Does SED-C reflect another outfall for the B779 Area Drain?

Section 5.2.4: Although the intended use of the well points is to define the plume and aid in locating the monitoring wells, will these well points be used, or maintained for future use, as piezometers? The Division recommends that water levels be determined from the well points at the same frequency as the monitoring of wells and be maintained for use in future remedial efforts.

Section 5.3.2.2: It would be to DOE's advantage to note the potential problems associated with the impact of clayey soils to GPR capabilities and plan accordingly

Section 5.3.2.3: The discussion of EM does not discuss possible interferences, however, it is assumed that such concerns are being addressed by expert operators.

Section 7.1.3.2: Figure 7 1 2 is only referenced in relation to the identification of hot spots (see 4th bullet, page 7-6) However, the first paragraph of page 7-9 should have indicated that this process was to be used to reduce the number of COCs for consideration in the risk assessment. The bulleted items of page 7-8 merely represent the basic approach to COC identification which, as presented, resulted in confusion for the Division on the intended approach. Thus, Figure 7 1-2 is the appropriate process for COC selection