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States Government

Department of Energy

Rocky Flats Office

DUE
DATE 3-10-92

Memorandum

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ROCKY FLATS L&H
CORRESPONDENCE CONTROL

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ERD JLP-1980

Stage 1 Implementation of OU5 and OU6 Surface Water and Sediment Sampling

Erich Evered, Director
Environmental Management
EG&G Rocky Flats Inc

The work plans for Operable Unit (OU) 5 and OU6 state that all existing surface water and sediment data will be reviewed prior to initiation of field activities. Data collected during the ongoing monitoring activities may already satisfy the requirements of these work plans. I request that your staff start this data assessment immediately so that field work milestones for both OU5 and OU6 are met.

Although the scope of this assessment is not clear my staff and I agree that the level of effort appropriate for this assessment is significant. The final product of this assessment will be a technical memorandum (TM) for each of the OUs. The TM will compile the data, describe the assessment procedures that were performed, interpret the results of the assessment as they apply to the OUs, and develop and propose a justified strategy for surface water sample collection in specific areas.

In concurrence with staff members from the Earth Resources Division (ERD) Surface Water Division (SWD) and Remedial Programs Division (RPD) we ask that the assessment be performed in the following manner:

Literature Review

Utilize existing reports that support the characterization of contamination in OU5 and OU6

Data Compilation

This review applies to all surface water and stream sediment data collected from 1989 to present. In areas where there is groundwater and surface water interaction use groundwater data to support any interpretations. Pond sediment data includes the results of all samples collected since the initial construction of each pond. Do not limit this assessment to chemical data. Include toxicity and ecological studies in the assessment if they will contribute to the characterization of the drainages. Incorporate supporting studies such as those performed on storm events, pond stratification, surface water/groundwater interaction, and pond sediment accumulation into the assessment when appropriate.

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BERMAN, H S	
BRANCH, D B	
BURLINGAME, A H	
CARNIVAL, G J	
COPP, R D	
CROUCHER, D W	
DAVIS, J G	
EVERED, J E	<i>AKT</i>
FERRERA, D W	
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HANNI, B J	
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KIRBY, W A	<input checked="" type="checkbox"/>
KRIEG, D	
KUESTER, A W	
LEE, E M	
MAJESTIC, J R	
MARX, G F	
MORGAN, R V	
PIZZUTO, V M	
POTTER, G L	
SANDLIN, N B	
SHEPLER, R L	
SULLIVAN, M T	
SWANSON, E R	
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WIEBE, J S	
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Assessment

Delivery deadlines for this assessment are tied to the schedule for implementation of field work at each OU. For this reason, segment the assessment into two steps. First, complete an evaluation of pond water and pond sediment. Follow step one with an evaluation of stream channels and creek flows.

Complete each assessment with respect to the OU requirements. Address sampling requirements outlined in the Inter Agency Agreement (IAG). However, consider methods of characterization that will improve on the requirements of the IAG. Justify interpretations with a clear and concise formulation of scientifically accepted concepts. Present the technical memorandum in a format that will be easily understood by readers not experienced with the methodology used in the assessment.

Recommendations for sampling may not agree with the work proposed in the current OU sampling plans or the IAG. Outline and rationalize in detail any deviations from these documents. Prepare standard operating procedures (SOPs) required for any special sampling not detailed in the current surface water volume. Since the TM will serve as the surface water and sediment sampling work plan after completion, attach SOPs required for the special sampling to the TM.

We believe that a quality assessment of existing data will produce the rationale for a substantial reduction in the proposed surface water sampling program for both OU5 and OU6. Therefore, the increased cost of this assessment will be matched with reduced costs for subcontracted field sampling and analysis. The assessment may recommend no change or additional field sampling. Since a thorough understanding of surface water conditions in Woman Creek and Walnut Creek is mandatory for these priority drainage OUs, savings will be realized during the development of the Phase 1 Report.

The deadline for the completion of these TMs is dictated by your schedule for field activities and the time required for regulatory approval. The EPA has suggested that they will accelerate their review of TMs for OU5 and OU6 to one week. However, this review period will depend on the quality of the TM. DOE has been working closely with EG&G staff on the scope of these TMs. This relationship should continue throughout the assessment process in order to reduce the time required for internal review and assure that the EPA is informed of our progress. To maintain this relationship, we request that a biweekly meeting be scheduled between representatives of DOE, the responsible RPD OU managers, and experts from SWD and ERD. The purpose of the meeting will be to resolve any issues that arise during the assessment and to assure that there is adequate coordination between DOE and participating EG&G Divisions.

If you have any questions, please call Jen Pepe at x2184.


Frazer R. Lockhart
Director
Environmental Restoration Division

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