



COLORADO
DEPARTMENT
OF HEALTH

July 12, 1991

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

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**RE: COMMENTS; FINAL DRAFT, PHASE I RFI/RI WORKPLAN,
ROCKY FLATS PLANT, WALNUT CREEK PRIORITY DRAINAGE
(Operable Unit No.6), APRIL 1991**

Dear Mr. Hestmark,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division) has reviewed the subject document submitted by DOE and prime contractor, EG&G. The Division's comments are attached.

The referenced document could not be approved in its present form. The most significant issues are:

- o The Field Sampling Plan is based on the minimums specified in the IAG, Statement of Work, Table 5, rather than a comprehensive plan to establish nature and extent of contamination. The Division will support minimums only when it is apparent that more comprehensive efforts are unwarranted.
- o The workplan continually refers to additional phases or stages of work. Any stages of investigation must be specified in this workplan and performed within the schedule established by the IAG; not deferred to a later date.
- o Planned sampling activities do not fully reflect the uncertainty of IHSS boundaries.
- o Conceptual Models of contaminate release are incomplete. "Initial" contaminate sources are not fully considered because plumes, resulting from such releases, are regarded as the "sources".
- o Exposure Pathways are flawed. Air pathways and ground water pathways, for stream drainages and some IHSSs, are ignored.

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- o The vadose zone must be monitored or sampled where ground water has been identified as a contaminant pathway.
- o Proposed reductions in FSP sample grids exceed a 30-50% factor discussed between EPA and DOE at a March 15th scoping meeting. Depending on whether the original grid is assumed to be a block-centered or mesh-centered grid etc. proposed reductions are on the order of 50-75%.
- o "Geologic" interpretations are based on a "hydrologic" report and a Geologic Characterization Report, 1990. The latter report must be submitted to the agencies or interpretations must be described in an effectual manner that does not require reference to the report.
- o The ARARs section excludes specific compounds identified in Colorado Water Quality Control Division regulations and misapplies limits for other constituents. It further fails to specifically acknowledge RCRA Health Based standards as ARARs.

For these and other reasons discussed in the attachment, the Division recommends substantial revision of the plan before we can support approval.

If you have any questions concerning these comments, please call Harlen Ainscough of my staff at 331-4977.

Sincerely,



Gary W. Baughman
Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division

Attachment

cc: Daniel S. Miller, AGO
Frazer Lockhart, DOE
Brent Lewis, DOE
Tom Greengard, EG&G
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