



- CDH requests that the sampling program at the Triangle Area (IHSS 165) include the Protected Area (PA) area as part of the investigation

In addition to the above specific items, there are nonspecific requests for additional sampling points along all of the identified and suspected migration pathways that may be present. For example, potential sampling may be requested along all the pipeline connections between retention ponds, and there are numerous requests for Vadose Zone samples. All of these requests are outside of the IAG's Scope of Work for OU 6. Again, these comments indicate that EPA/CDH would like to perform the entire investigation in a single phase.

- Applicable or Relevant and Appropriate Requirements (ARARs) -- There were numerous comments on the ARARs in Section 3.0 of the Final Draft Work Plan. EPA has requested that EG&G Rocky Flats specify Data Quality Objectives (DQOs) such that the  $10^{-6}$  point of departure can potentially be determined if needed and that RCRA Appendix IX constituents be considered as ARARs for the site. This will significantly increase the scope of the Analytical Plan for OU 6 (Costs and Schedules for OU 6). EG&G Rocky Flats assumed the ARARs were going to be handled in an approach similar to that taken for Woman Creek Drainage Work Plan (OU 5).
- Vadose Zone Monitoring -- Vadose Zone monitoring is requested by both agencies to monitor the existing contaminants, to characterize the unsaturated zone, and to monitor any potential future contaminants that may occur. Should additional Vadose Zone monitoring for OU 6 be added beyond the soil sampling program that is currently specified in the OU 6 Final Work Plan, or should the existing program based on the IAG be retained?
- Bedrock Geology -- CDH has numerous comments on the bedrock geology for OU 6. Specifically these comments deal with the submittal of the Draft Geologic Characterization Report, the appropriate identification of the bedrock formation present (Arapahoe or Laramie), the characterization of the bedrock sandstones that exist beneath OU 6, and the location of these sandstone units. EG&G is currently using the bedrock characterization contained in OU 2 Bedrock Work Plan as a model for the description of the OU 6 geology.
- Air Monitoring -- Both EPA and CDH request that the existing data and the current and potential sources for air emissions be evaluated to determine potential exposure pathways, and they request the placement of appropriate monitoring stations for these pathways.

EG&G Rocky Flats proposed installation of air monitoring stations as outlined in the Draft Final Work Plan for OU 6. EG&G Rocky Flats will have to address the rationale and the background data evaluation for the placement of the air monitoring stations in the revised Work Plan.

- Discharge Points and Retention Pond Discharges/Interconnection -- Additional information and specific discharge points are requested for the plant discharges into the Walnut Creek Drainage and the historic plumbing/discharge relationship between individual retention ponds. Much of this information does not exist.

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- Environmental Evaluation Work Plan (EEWP) Comments -- EG&G Rocky Flats feels the comments by CDH regarding the EEWP need no action at this time. The EEWP comments have been addressed in previous reviews. CDH provided the same comments for OU 5 EEWP

If you have any questions on these issues, please contact P S Bunge at extension 7121 or J T Ottensman at extension 3198, both of Remediation Programs

  
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