

EM-453 COMMENTS ON : TECHNICAL MEMORANDUM NO.1,
ADDENDUM TO FINAL PHASE 1, RFI/RI WORK PLAN,
WALNUT CREEK PRIORITY DRAINAGE, OPERABLE UNIT NO. 6 (OU6)
ROCKY FLATS PLANT, SEPTEMBER 1992, BY ?

GENERAL COMMENTS

- 1 The plan is commendable in that it does reduce some of the work being conducted at Operable Unit 6. Brief supporting scientific descriptions should be included to support the recommendations and compliment the figures
- 2 Additional sampling could be reduced if the scope of redundant sampling was expanded to include the operable units surrounding the Walnut Creek Drainage. The draft attachment is provided as a suggestion to reduce the sampling for Environmental Evaluation. The various wells, existing and planned, are also extensive and could be incorporated into an overall drainage basin investigation
- 3 The sediment and surface water sampling efforts should be clarified It is unclear why the sampling sites have been selected, or how the selected sites are different from the site-wide surface water characterization program, stormwater monitoring, or NPDES monitoring programs

SPECIFIC COMMENTS

- 1 Section 2 0 The proposed well should be identified as either upgradient or downgradient.
- 2 Section 2 0, fourth paragraph A summary table should be included which list the background contaminants and average concentrations
- 3 Section 3 0, first paragraph Why does "EG&G consider the two wells immediately downgradient of the dams a redundancy?" A brief hydrologic rationalization should be included to support the above statement
- 4 Section 5 0, first paragraph. It should be explained how the samples will be collected. If appropriate, a reference could be made to the Work Plan
- 5 Section 5 0, fourth paragraph: Please clarify why these samples are necessary to identify if contaminants are being transported for the Individual Hazardous Substances Sites (IHSS), i e , explain the information that will be received at each sampling site
- 6 Section 5 0, fifth and sixth paragraph Please clarify what "most of the analytical data" and "almost all" means
- 7 Figure 7-2 The five proposed bedrock monitoring wells should be removed from the map because Section 2 0 indicates that these wells are no longer proposed
- 8 Figure 7-4 The three proposed radioactive ambient air monitoring stations should be removed from the map because Section 4 indicates that these stations are no longer proposed

Attachment

Definition of Operable Units at Rocky Flats Plant

Effect on Environmental Evaluations
Resulting from Consolidation of Operable Units
example. Walnut Creek Basin
(EE workplans for OU-2, OU-6, OU-10, and OU-11 were reviewed)

Defining a Walnut Creek Basin Operable Unit (OU) would require consolidation of OU-6, Walnut Creek Basin, OU-7, Present Landfill, and parts of OU-2, 903 Pad Area, OU-4, Solar Ponds, OU-10, Other Outside Closures, OU-11 West Spray Field, and OU-14, Radioactive Sites. Presently each of these OUs has its' own Environmental Evaluation (EE). Examining the Walnut Creek Basin as an OU allows for a comprehensive examination of the effects of contamination on the basin, and reduces the amount of sampling required by eliminating redundancy. Terrestrial and aquatic sampling for OU-2, and 6 overlap along the South Walnut Creek. Both EE workplans indicate vegetation and animal sampling transects are planned in this drainage basin and also discuss sampling ponds B-4 and B-5 for information pertaining to the aquatic habitat. OU-7 and OU-6 workplans indicate that both will sample the unnamed tributary (the drainage north of North Walnut Creek) for vegetation and biota. Eliminating redundancy in the terrestrial sampling would result in a reduction of approximately 40% in this area. The aquatic sampling shows redundancy in 4 out of 26 sampling locations. A reduction of 15% is achieved if the redundant locations are dropped. The unnamed tributary has aquatic sampling locations for OU-7 and OU-6 alternating down the drainage. It may be possible to use half of the suggested locations resulting in dropping two more sample areas for a further reduction of 7%. The total reduction in aquatic sampling would be approximately 22% just by eliminating redundant and overlapping sampling locations.

Statements were made in the EE work plans regarding coordination between each OU investigation. The type of coordination was not specifically described but the assumption was made that all work described in each EE work plan would be conducted. Language such as, field efforts will be coordinated among OUs, however, provides a mechanism for an integrated approach even under the current organizational scheme. That is, if data quality objectives (DQOs) were well defined for all OUs prior to field sampling for any OU, a comprehensive list of contaminants of concern (COCs) and receptors could be derived. This would allow the field sampling in areas receiving COCs from multiple OUs to be undertaken at one time and information would be available to the source areas involved. Without a reorganization of OUs or this type of coordination for field sampling, it is not clear how similar COCs from multiple sources will be assigned as originating from one OU over another. This is also true of the receptors involved. Wildlife species are mobile and sampling for each OU will not provide data about any OU exclusively where boundaries and COCs are similar. Where COCs are dissimilar, constructing a comprehensive list would nonetheless allow sampling of biota to occur on a larger scale yielding data for each of the source areas.