



Department of Energy

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95-DOE-08220

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Mr. Joe Schieffelin, Unit Leader  
Hazardous Waste Facilities  
Colorado Department of Public Health and the Environment  
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Gentlemen:

The purpose of this letter is to present the Department of Energy's (DOE) proposal to cancel the implementation of the Operable Unit (OU) No. 7 Seep Collection and Treatment Proposed Action Memorandum (PAM).

On April 15, 1994, the Department of Energy/Rocky Flats Field Office (DOE/RFFO), the Environmental Protection Agency (EPA), and the Colorado Department of Public Health and Environment (CDPHE) signed a resolution in which the Senior Executive Committee agreed that an Interim Measure/Interim Remedial Action (IM/IRA) for leachate collection would be submitted to the agencies within six months. The DOE received a letter from the Colorado Department of Public Health and Environment (CDPHE) on May 11, 1994 that stated: "implementation milestones for the Leachate Collection IM/IRA will be revisited after release of the Final IM/IRA." The draft PAM was submitted to the agencies on October 14, 1994. The agencies approved the PAM on December 8, 1994. The approval letter states that "actions proposed under PAMs are to be implemented within six months of the date when the parties agree that they are necessary and appropriate." Informal discussions have been held between the DOE project staff and agency representatives regarding the implementation of the PAM. The DOE would like to finalize the content of these discussions in order to determine the best path forward for OU 7.

DOE Proposal

As discussed with your staff, DOE/RFFO has reviewed technical data that has recently become available and believes that it should also be taken under consideration by the agencies. An evaluation of this data shows that the OU 7 seepage does not meet the criteria for an accelerated response action under the Interagency Agreement (IAG). The criteria for an accelerated action are: consistent with any long-term remedial action

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objectives, an explanation of risks which the accelerated response action is intended to mitigate, and waste management considerations. The DOE's evaluation was centered on each of these criteria. The results are as follows:

1. Consistency with Final Remedy

The PAM would not be consistent with the final remedy because the seep area will be covered over and capped. In some options the East Landfill Pond sediments will be consolidated under the cap, and the dam will be removed as part of landfill closure. Covering and capping of the seep area would involve removal of the seep water pump and removal or abandonment of the seep collection sump if the PAM were implemented. The above-ground pipe section leading away from the sump toward the collection tanks would also be removed.

2. Mitigation of Risk

In the area of risk mitigation, we have determined that the OU 7 seep collection and treatment are not "...necessary and appropriate to provide for expeditious actions to mitigate a threat or potential threat to public health or the environment..." To make this determination, EG&G was requested to conduct a focused risk analysis of the seep water and East Landfill Pond water using data from the RCRA field investigation. A reasonable maximum exposure (RME) scenario was used which involved a trespasser or ecological researcher drinking and swimming in the waters. Cumulative risk factors of  $10E-7$  (carcinogenic) and hazard index well below one (non-carcinogenic) were derived from this RME scenario.

3. Waste Management Considerations

An analysis of water hauling and treatment costs for the seepage indicates that treatment at a facility on-site but remote to OU 7 would have annual hauling and treatment costs of about \$745,000. Similar costs could be expected for treatment of groundwater in existing treatment facilities. This outcome is one reason for assessing on-site treatment at OU 7. Depending on the type of treatment, storage may not be needed prior to treatment, in which case the PAM collection piping and tanks would not be part of the future remedy.

Next Steps

The DOE would like to meet with you at your earliest convenience to discuss any questions you may have regarding the technical information that supports canceling the PAM and addressing the seep as part of the Draft IM/IRA that will be submitted on August 31, 1995.

Since this issue has an impact on the content and schedule of the IM/IRA decision document, the DOE would appreciate a written response no later than close of business March 24, 1995.

M. Hestmark & J. Schieffelin  
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If you have any questions or comments, please contact Peg Witherill at 966-6585.

Sincerely,



Steven W. Slaten  
IAG Project Coordinator  
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