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To: <i>Jan Pepe</i>	From: <i>Bill Fraser</i>
By: <i>DOE</i>	Phone: <i>294-1081</i>
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NSN 7540-01-311-7000	5010-101 GENERAL SERVICES ADMINISTRATION

Ref: 8HWM-EF

Mr. Richard Schassburger  
Department of Energy  
Rocky Flats Office  
P.O. Box 928  
Golden, CO 80402-0928

re: Industrial Area IM/IRA

Dear Mr. Schassburger:

EPA has reviewed your March 14, 1994, submittal of the Draft Decision Document for the Industrial Area IM/IRA. Our comments are attached. EPA comments must be addressed in the final submittal, along with those submitted separately by CDH. Some of the comments may require discussion and negotiation to reach a resolution. We look forward to working with your staff to resolve these issues informally and avoid any additional submittals prior to release for public comment.

We appreciate your efforts to move forward by allowing us to review this document in parallel with DOE. We will cooperate in expediting finalization of the Decision Document and in other steps necessary to ensure prompt implementation of the IM/IRA.

If you have questions or would like to discuss the progress of this effort, please contact Bill Fraser (EPA) at 294-1081.

Sincerely,

Martin Hestmark, EPA  
Manager  
Rocky Flats Project

cc: Joe Schieffelin, CDH  
Dave Norbury, CDH  
Norma Castaneda, DOE  
Jan Pepe, DOE  
Mark Buddy, EG&G



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## EPA Comments - Draft Industrial Area IM/IRA/DD - March 1994

## General Comments

1. Note that the introduction (Section 1.2) states, "The objective is to maintain a safety net around the Industrial Area to monitor for, protect against, and respond to potential contaminant releases until and during D&D." It is hard to argue that the presentation of a set of "recommendations" meets this objective.
2. Implementation mechanism/schedule and pre-programmed response capability, which were discussed during scoping and review meetings is still missing. All parties need to work these out, and we feel this needs to happen before the document goes to public comment.
3. In the public comment version, the Recommendations need to be presented as proposed actions, and a commitment made to execute them. Otherwise, this document does not meet the requirements for an IM/IRA/DD, the whole purpose of which is to present proposed actions so the public can review and comment on them before they are executed.

## Specific Comments

1. Section 1.2 - The "goals" listed are not really goals at all, but a sampling of some of the subtasks undertaken. Even at that, they are not very well formulated and do not seem to add anything to the discussion.
2. Section 1.4.5 - After reading this explanation, it is no longer clear even to me why the incidental waters were broken out as a separate problem. We need to do better at explaining that so the public can understand it.
3. Section 3.2.1.3 - This is the first instance (of many) where it is mentioned that something "should" be done. If it really needs to be done, the IM/IRA/DD must commit to getting it done, and specify how and when it will happen.
4. Section 3.3.2 - If the appendix should have been updated in March 1994, this task should be completed and the new results included in the new version.
5. Table 4-3 - If this listing is really 18 months old, it should be checked to see if it is still correct.
6. Section 4-5 - If a substantial portion of the data is still missing and cannot be included in the version released for public comment, we must specify when and how this section--and the recommendations--will be updated to reflect new results.

7. Section 4.8.2 - Please explain how (or if) these wells relate to those already specified in the industrial area OU work plans and to the comprehensive RI plan(s).
8. Section 5.0 - The statement that DOE agreed to analyze for 'radionuclides (and other constituents) solely regulated by DOE' is both incorrect and unnecessary. Also, please explain what is meant by 'program limitations that do not allow the objectives of the IM/IRA to be met'. If these exist, the IM/IRA/DD must specify how they will be dealt with.
9. Table 5-6 - If the radionuclide data is supposed to be there, then include it; if not, drop that section of the table.
10. Section 5.5.1 - We thought mass-balance efforts were being undertaken under the OU 5&6 RIs. Please explain if these efforts have been factored into this evaluation.
11. Section 5.5.2 - The NPDES permit is not expected to place numeric limits on the quality of water discharged from the IA perimeter outfalls. That's not quite the same thing as what is stated here.
12. Section 5.7 - Again, and here it is very important, we must state that the necessary update of proposed actions will be done.
13. Section 6.6 - Everyone recognizes schedule constraints exist; it isn't necessary to point it out explicitly.
14. Section 6.6.4.1 - RFP had requested EPA certification of the new air sampling device. The status (and the expected outcome if available) of this request should be included here.
15. Section 7.0 - This entire chapter suffers, more than any other, from rambling, weak, and convoluted writing. It should be subjected to an aggressive edit, including the possibility of overall reorganization. The subject matter is complex, but that does not mean the presentation needs to be disorderly.
16. Section 7.1 - This discussion should be removed unless some value can be ascribed to it.
17. Section 7.2.2 - The assertion that all foundation flows are monitored contradicts the information presented in Section 5.
18. Section 7.3.3 - It might be useful to append the CDIW plan if it is not too long. The recommendations mixed in here should be saved for the proper section or they will tend to get lost. Please explain the relationship (if any) of the 'position paper' from which the charts were taken to the CDIW plan, and be specific about which one(s) are actually being applied onsite.

19. Section 7.7.1 - The long discussion about poor sampling coverage on the drain locations does not match with previous statements that all these flows are monitored.

20. Section 7.7.2 - The extent to which the NPDES Permit may impact foundation drain monitoring is vastly overstated. The long discussion about Building 374 and the complications of the "commercial substitute designation" is interesting, but does not appear relevant.

21. Section 7.7.3 - I would like to see the justification for recommending that the OU 1, OU 2, 910, and 774 facilities not be used to treat incidental waters. The brief rationale presented here appears to boil down to it being inconvenient. We need to do better than that.

22. Section 9.0 - At the rate that the D&D plans (if that term is still in use) appear to be changing, it would be wise to check with someone in top management to see if this description of the program is still reasonably accurate.

23. Section 9.1.8 - We need to explore ways to firm up the commitment to link and expand the IM/IRA as necessary as D&D proceeds and circumstances change.

24. Section 9.5 - Recommendations need to be presented to the public as Proposed Actions. When this document is approved, they will become binding commitments, so they need to be made as specific as possible, or have a definite schedule and procedure for when and how they will be made so.

25. Section 11 - As stated in the general comments, schedules and commitments for monitoring and response mechanisms must be included here.