



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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Ref: 8HWM-FF

Mr. Gary Baughman
Hazardous Waste Facilities Unit Leader
Colorado Department of Health
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Dear Mr. Baughman:

The purpose of this letter is to transmit EPA's comments and those of our contractor (PRC) on Technical Memorandum 1 for OU 9, the Original Process Waste Lines. The attached comments question the advantages and the value of moving forward with the proposed field sampling plan based on the following reasons: 1) DOE has proposed integrating the Industrial Area OUs scope; and 2) closure of the underground tanks may entail removing the tanks for ultimate decontamination and disposition. Answers to these global questions need to be presented prior to moving forward with the implementation of the proposed field work. EPA suggests withholding approval of the technical memorandum until DOE properly addresses the attached comments.

In order to expedite approval of this technical memorandum, DOE should submit responses to the attached comments via formal letter. EPA does not see this effort to be very extensive nor requiring a lot of time. Therefore, the schedule for field work should not be substantially impacted.

Please do not hesitate to contact Arturo Duran of my staff at (303) 294-1080 with any questions regarding this matter.

Sincerely,

Martin Hestmark, Manager
Rocky Flats Project

cc: Jessie Roberson, DOE
*Steve Slaten, DOE
Joe Schieffelin, CDH
Dave Norbury, CDH



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ADMIN RECORD

A-0109-000231

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EPA Comments on Technical Memorandum 1
for the Original Process Waste Lines, OU 9

General Comments

- It is unclear how this field investigation will fit in with the comprehensive scoping and new approach for the integration of OUs within the protected area. EPA would like to eliminate duplication of efforts. Therefore, EPA suggests DOE properly coordinate these field activities with the scoping effort of the Industrial Area OUs.
- During the summer of 1993, EPA suggested that DOE evaluate the advantages of pulling out underground tanks within OU 9 prior to implementing the field investigation. EPA believes that several underground tanks will need to be pulled out during closure activities because of their location, construction materials, process knowledge operation, and documentation on past releases. This technical memorandum did not include any discussion regarding this possibility. EPA feels that the tank's integrity, residual contamination in the tank and nature and extent of any contamination in the soil can better be assessed if underground tanks are pulled out first. Also, cost and time savings should occur in the overall closure cycle of these underground tanks. Again, EPA suggests DOE perform this evaluation prior to moving forward with the proposed field investigations.
- This technical memorandum proposes sampling at three intervals for each proposed borehole location. While the proposed sample intervals may be adequate, the technical memorandum failed to present a rationale. EPA suggests that this technical memorandum include a discussion justifying the proposed sample intervals.
- The value of implementing the HPGe survey at each proposed location is questionable. It is unclear whether the HPGe survey objective is to screen potential contamination to direct the field work or for health and safety purposes. In addition, the 25' proposed diameter for the screening survey is not appropriate because there are several underground tanks that are present at smaller locations. EPA suggests evaluating the need for the HPGe survey as a whole. In very rare circumstances, underground tanks could have contributed to surface contamination. If it is decided that the HPGe survey should be conducted, then it should be done in a manner to target smaller areas than 25' diameter circles.
- In several cases, the technical memorandum did not propose field investigations on underground and above ground tank locations because it is claimed that they are considered active tanks. The status of some of these tanks is questionable. However, regardless of their operational

status, such as active, inactive or interim status, these tanks need to undergo closure activities. If DOE wants to keep operating some of these tanks, DOE may need to submit a permit application for CDH review and approval if the tanks contain hazardous waste. In addition, this technical memorandum did not include information on the present integrity of these tanks. This information needs to be presented.

- This technical memorandum needs to include the rationale for proposing only one borehole location on areas where the underground tanks have been removed. Drilling only one borehole will not adequately assess existence of soil contamination. If the area was backfilled with clean soils, the proposed location may encounter only the clean soil missing any potential contaminated soils. This needs to be revised to ensure that all potential areas of concern are properly investigated.

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1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC) completed a technical review of the Draft Final Technical Memorandum (TM) Number 1, Addendum to Phase I Resource Conservation and Recovery Act (RCRA) Facility Investigation/Remedial Investigation (RFI/RI) Work Plan, Field Sampling Plan (FSP), Volume I, Part A - Outside Tanks for the Rocky Flats Plant (RFP) Operable Unit (OU) 9 - Original Process Waste Lines, U.S. Department of Energy (DOE), March 2, 1994. The technical review comments have been completed as part of work assignment number C08091, contract number 68-W9-0009 (Technical Enforcement Support [TES] 12).

This review is divided into general comments, addressing the overall technical memorandum; and specific comments, keyed to statements or topics in specific paragraphs or sections of the document. In general, the technical review concentrates on significant issues. The adequacy of the responses to past comments by the U.S. Environmental Protection Agency (EPA) on the OU9 Final Work Plan for OU9 was also reviewed. Comments on editorial and typographical errors are avoided except where the accuracy or clarity of the TM were affected.

2.0 GENERAL COMMENTS

In general, the TM 1 FSP for the outside tanks is brief and its purpose confusing. This TM 1 sampling plan is presented as Part A of Volume I for the outside tanks; the text states that Part B of Volume I for the inside tanks will be submitted later. The text states that Volume II consists of the pipeline investigation. Part A of Volume I apparently makes up what is referred to as the Stage 1 investigation, with Stage 2 occurring later and to be included in a future technical memorandum. The relationships between Stage 1 and 2 investigations and Volume I and II, Parts A and B, should be clarified.

In addition, currently active tanks are not proposed to be investigated as part of this TM. Investigations on active tanks are postponed until later. At a minimum, tightness testing should be conducted on the tanks to determine if they are leaking. Also, soil samples could be collected and soil borings completed around active tanks without disturbing the tanks. Without data from near the active tanks, the investigation cannot assess all sources of contamination to soils and groundwater, so it will be incomplete. Investigations around active tanks should also be proposed in this FSP.

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3.0 SPECIFIC COMMENTS

1. Table 1-1. Tank numbers T-12, T-31, T-33, T-34, and T-35 are listed as invalid tank locations. There is currently no discussion in the text explaining the invalid tank locations. The discussion should include why these areas were originally suspected as tank locations and how they were determined not to be tank locations. An adequate explanation should be added to the text.
2. Figure 1-1. Figure 1-1 shows the original process waste lines, buildings, tanks, and other areas of interest. The tank locations are difficult to see on the figure. The lettering should be in boldface or highlighted in some way to allow for easier location of the tanks.
3. Table 1-3. The first occurrence of tank T-8 on the table is apparently mislabeled and should be changed to tank T-7. Also, under tanks T-14 and T-16 the text states that individual hazardous substance site (IHSS) 124 - Radioactive Liquid Waste Storage Tanks is composed of three subparts (124.2, 124.2, and 124.3). The first subpart appears to be mislabelled as 124.2 instead of 124.1. The table should be changed for clarity.
4. Table 1-3. The table refers to analyzing soil samples for hazardous substance list (HSL) volatile compounds, whereas Table 5-1 and Section 5 refer to analyzing for contract laboratory program (CLP) volatile compounds. The inconsistency should be clarified.
5. Section 3.1.5, page 5 of 29, 4th paragraph. The text states that a single borehole will be drilled as closely as possible to the center of the original tank location for locations where the tanks were removed. Drilling only a single borehole may miss contamination from leaks along the ends of the tanks. Generally, three samples are required from the base of an excavation (each end of the tank and the center) when tanks are removed to determine if the tanks have leaked. An explanation of why only one borehole is proposed should be included in the text.
6. Section 3.1.6, page 6 of 29, 4th bullet. The text states that samples may be collected at refusal if bedrock is encountered before the water table. If refusal occurs, it may not be possible to collect a sample. The plan should address this potential.

