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The purpose of this document is to notify the Environmental Protection Agency (EPA) and The Colorado Department of Public Health and the Environment (CDPHE) of DOE's intention to transfer IHSS 176 from Operable Unit 10 (OU 10) to Operable Unit 4 (OU 4). Included in IHSS 176 is an operating Resource Conservation and Recovery Act (RCRA) storage facility located in Building 964. This building and the storage facility will not be included in the annexation because we expect the building to be closed following a RCRA closure plan, as specified under Colorado and federal statutes.

IHSS 176 is identified in the Interagency Agreement (IAG) as the S&W Contractor Yard. It is located approximately 50 feet east of the Solar Evaporation Ponds and is a rectangle about 290 ft. by 390 ft. (according to the IAG). The area was used as a storage for contractor material since 1970. The area was not intended for hazardous waste storage; however, several containers of volatile organics, waste oil, and metals were found in the year in 1985. Based on the discovery of the hazardous wastes and some ground staining, the area was sampled in 1988 by R. F. Weston. The IAG included IHSS 176, based on the Weston data that showed elevated levels of aluminum, arsenic, barium, beryllium chromium, sodium, thallium, calcium, cadmium, copper, iron, lead, magnesium, manganese, mercury, nickel, potassium, vanadium, zinc, strontium, nitrate/nitrite, gross alpha, gross beta, tritium, americium 241, plutonium 239 and 240, and uranium 233, 234, and 238. The IAG milestone for the Phase I Interim Measure/Interim Remedial Action (IM/IRA) Construction of IHSS 176 is February 9, 1998.

Solar Ponds Projects desires to annex IHSS 176 due to the proximity of IHSS 176 to OU 4 and the ability of OU 4 to start construction of IHSS 176 well ahead of the IAG start of construction milestone for OU 10 (September 1995 for OU 4 versus February 9, 1998 for OU 10).

Though characterization of IHSS 176 is not yet complete, preliminary data shows contaminants similar to those in OU 4. Depending on the final results of the sampling effort, we may need to establish additional Preliminary Remediation Goals (PRG) for any IHSS 176 analytes not found in OU 4. The assumption is that the work plan for the Phase II RCRA Facility Investigation Investigation/Remedial Investigation can be amended to cover any additional work that might be necessary to account for incomplete or missing data to effectively remediate IHSS 176. The Draft Phase I Non-Intrusive Technical Memorandum for OU 10 is expected to be completed at the end of August 1994. The OU 10 Manager has indicated that, as of now, the remediation remedy recommended for IHSS 176 will be "hot-spot" removal and capping.

The same remedy was suggested in the Strategic Planning Initiative, Review, and Implementation Team (SPIRIT) draft document entitled, "An Analysis of the Potential for Redirection of the Rocky Flats Environmental Restoration Program." This was an independent review which determined that hot spot removal and capping would be an appropriate remedy for IHSS 176. The OU 4 remedy is also excavation of media and waste and capping. Thus the IHSS 176 is compatible with OU 4 Phase I IM/IRA.

If you have any questions or comments regarding this issue please contact F. R. Lockhart at extension 7856 or digital page 0770.