

Colorado Department of Public Health and Environment  
Hazardous Materials and Waste Management Division

Draft Record of Decision Declaration  
Rocky Flats Plant Operable Unit 16: Low Priority Sites

Comments

---

COMMENTS

Title of Decision Document - This document is intended to document the selection of remedial action at OU 16 under both CHWA and CERCLA authority. The title of this document should accurately reflect the scope of this decision. Per section XIII page 42 of the IAG statement of work, the title of this decision document should be, Corrective Action Decision/Record of Decision Declaration.

State of Colorado Signature - The signature block for State concurrence on the CAD/ROD should be for signature by Tom Looby, Director, Office of Environment, Colorado Department of Public Health and Environment. Please note the Department's name was changed to the Department of Public Health and Environment on July 1, 1994.

Site Geology Description - The section Site Name, Location, and Description contains the sentence, "The pediment surface has a fan like form, with its apex and distal margins approximately two miles west of RFP." The term "apex" and "distal" generally apply to an alluvial fan such as the Rocky Flats Alluvium, not to the pediment surface the fan rests upon. If the pediment surface has a fan-like form it is because of the protection from erosion provided by the alluvial fan. Furthermore the term "distal" means the terminal edge of the fan which does not occur two miles west of RFP. Both the alluvial fan and the pediment surface are dissected and portions of them terminate within RFP boundaries.

Water Quality Standards at IHSS 194 - The 700 area ground water is in the Rocky Flats Alluvium and possibly Quaternary colluvial deposits and therefore carries a surface water protection classification from the site specific classification ("Classification and Water Quality Standards for Ground Water" 3.12.0 CCR 1002-8). The applicable standard for tritium is 500 pCi/L, not the 20,000 pCi/L EPA drinking water standard. Since tritium associated with this release does not represent an existing source of contamination this standard will not impact the no action decision. However, the Division requests that the state water quality standard for tritium be added to the discussion of the summary of site risks for IHSS 194.

Protectiveness of Future Receptors - The Division requests that language be added to the summary of site risks clarifying that future receptors were considered in the conceptual model.

Page Numbering - The Division recommends that page numbers be added to the Final CAD/ROD.