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The Administrative Record Staff

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**Department of Energy**

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**ADMIN RECORD**

JUN 1 1995

95-DOE-10263

**Mr. Martin Hestmark**  
U. S. Environmental Protection Agency, Region VIII  
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Denver, Colorado 80202-2405

**Mr. Joe Schieffelin, Unit Leader**  
Hazardous Waste Facilities  
Colorado Department of Public Health and Environment  
4300 Cherry Creek Drive South  
Denver, Colorado 80222-1530

Gentlemen:

The purpose of this letter is to inform you of a funding change for the already planned substation demolition project at the Rocky Flats Environmental Technology Site (RFETS), and to inform you of and solicit your concurrence with our proposal for the evaluation and removal of polychlorinated biphenyls (PCB) contaminated soil and concrete of the substation. Funding for this project will come from a capital line item construction project currently underway at Rocky Flats entitled Electrical Distribution System Upgrade. In order for this project to proceed, RFETS must be able to specify clean-up levels and sampling methodologies in procurement documents.

The soil removal associated with the substation demolition project is one of the actions contemplated in the Draft Proposed Action Memorandum (PAM) dated March 1995 for the Remediation of Polychlorinated Biphenyls (PCBs). The soil removal will follow the strategy already described in the Draft PAM, and will also incorporate the comments received on the Draft PAM from the Colorado Department of Public Health and Environment (CDPHE) in their letter dated April 17, 1995 (attached). Briefly, the evaluation and removal of the soil in the area of the substation will be conducted as follows:

- 1) The soil cleanup level for this action will be 25 parts per million (ppm) PCBs with a field target level of 10 ppm PCBs by weight, based on the Toxic Substances Control Act (TSCA) PCB Spill Cleanup Policy and Office of Solid Waste and Emergency Response Directive No. 9355.4-01 FS, August 1990.
- 2) Initial sampling and analysis of the potentially contaminated soil in the area will be accomplished using an immunoassay technique (EPA SW-846 Draft Method 4020).
- 3) The extent of soil removal based on the immunoassay results will be determined by the project manager in the field.

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- 4) Soils which are contaminated at levels equal to or greater than 25 ppm PCBs will be removed and shipped to a TSCA-compliant incinerator for treatment.
- 5) After excavation of the PCB-contaminated soils, verification samples will be collected using the Midwest Research Institute (MRI) approach as described in 40 CFR 761. The analysis of the verification samples will involve both EPA Method 8080 and EPA Method 4020. As a cost and time savings measure, it is planned that 20% of the verification samples will be analyzed using EPA Method 8080, and 80% of the samples will be analyzed using EPA Draft Method 4020.
- 6) If verification samples taken after excavation exceed 25 ppm PCBs, additional soil will be removed until no verification samples exceed 25 ppm PCB.

The substation demolition project also includes the removal of two outdoor concrete transformer pads. Wipe samples have recently been collected and the analysis of these samples is expected to be completed in early June. Briefly, the evaluation and removal of the concrete transformer pads will proceed as follows:

- 1) If wipe sample results indicate that the level of PCBs on a particular pad is less than 10 ug/100 cm<sup>2</sup> (based on the TSCA PCB Spill Cleanup Policy), the pad will be removed and disposed of in the on-site landfill.
- 2) If wipe sample results indicate that the level of PCBs on a particular pad is equal to or greater than 10 ug/100 cm<sup>2</sup>, the surface of the pad will be scarified, using concrete scabbling equipment at RFETS\*.
- 3) Material removed during scarification will be collected and shipped to a TSCA-compliant incinerator or TSCA-compliant landfill, as applicable.
- 4) After scarification of the surface of the pad, verification samples will be collected using the MRI approach as described in 40 CFR 761. The analysis of the verification samples will again involve both EPA Method 8080 and field immunoassay. As a cost and time savings measure, it is planned that 20% of the verification samples will be analyzed using EPA Method 8080, and 80% of the samples will be analyzed using the immunoassay technique.
- 5) If the verification samples indicate that the level of PCBs on the scarified pad is less than 10 ug/100 cm<sup>2</sup>, the pad will be removed and disposed of in the on-site landfill.

If verification samples taken after scarification are equal to or greater than 10 ug/100 cm<sup>2</sup> PCBs, the project manager will at that time make a determination whether to continue with scarification, change decontamination methods, or end decontamination efforts altogether and remove the entire pad as TSCA waste.

\*If the concrete scabbling equipment proves to be unavailable to support the planned removal schedule, and if wipe sample results exceed 10 ug/100cm<sup>2</sup>, the entire pad will be removed and handled as TSCA waste.

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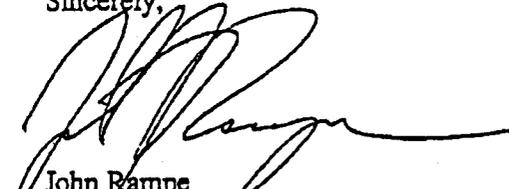
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This strategy of wipe sampling followed by scarification and verification sampling has been used successfully at this site in the past during the PCB Fire Hazard Elimination project.

The removal of the soil and substation must occur by this fall because the construction of a new substation at this location is scheduled to begin in March 1996. We plan to release the procurement documents for the substation and soil removal to the public for bid in mid-June. Therefore your concurrence with the 25 ppm PCB soil cleanup level, which we have based upon comments previously received from CDPHE on the draft PAM, and the strategy proposed to address the transformer pads is requested to maintain the critical path schedule for this project. DOE/RFFO is very willing to meet with you to discuss this project, and would like a formal response to the proposed 25 ppm PCB soil cleanup level and transformer pad strategy, at your earliest convenience.

Please call me at 966-6246, or John Stover of my staff at 966-9735, if you have any questions or would like more information regarding our proposal.

Sincerely,



John Rampe  
Senior Regulatory Advisor

Attachment

cc w/o Att:  
M. Karol, RFFO  
J. Roberson, RFFO  
D. Stewart, RFFO  
F. Lockhart, RFFO  
R. April, RFFO  
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