Colorado Department
of Public Health
and Environment

June 23, 2000

Mr Joe Legare
Assistant Manager for Environment
and Infrastructure
Department of Energy-RFFO
P O Box 928
Golden CO 80402-0928

RE Annual Update for the Historical Release Report (September 1999)

Dear Mr Legare

The Colorado Department of Public Health and Environment (CDPHE) and the Environmental Protection Agency (EPA) have reviewed the 1999 Annual Update for the Historical Release Report This report proposes three new PACs, updates existing IHSSs/PACs with additional information including the results of characterization and remediation activities, and makes recommendations for No Further Action (NFA) The agencies concur with the recommendations for NFA for the following PACs/IHSSs

900-1309	900-1312	900-1313	NW-74B
NW-1501	NE-1408		

The agencies need further information, as explained in the attached comments, to be able to concur with the recommendation for NFA for the following PACs/IHSSs

NE-1409	NW-170	900-1311

If you have any questions concerning these comments, please contact Carl Spreng at 303-692-3358 or Gary Kleeman at 303-312-6246

Sincerely,

Steven H Gunderson
RFCA Project Coordinator
Colorado Department of Public
Health and Environment

Tim Rehder
Rocky Flats Project Manager
Environmental Protection Agency

cc Norma Castañeda, DOE
Laura Brooks, K-H
Nick Demos, RMRS
Dan Miller, AGO
Steve Tarlton, CHPHE-RFOU
Susan Chaki, CDPHE

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

comments on

Annual Update for the Historical Release Report
September 1999
(RF/RMRS-99-428 UN)

---

1 PAC #000-504 (New Process Waste Lines)
This PAC identifies 3 documented releases from the NPWL and 4 potential waste streams in overlapping OPWL and NPWL It is understood that the releases identified in this update may not be all of the possible releases that have occurred

2 PAC #000-505 (Storm Drains)
This PAC identifies several releases/discharges into the storm drains associated with specific buildings Again, it is understood that these may not be the only areas of concern for this PAC

3 PAC SE-1602 (East Firing Range)
The two possible contaminants identified for this PAC are lead and depleted uranium Additional information needs to be provided regarding other activities that may have been conducted at the range These are

- Were weapons cleaned at the east firing range? If so, or if this can not be determined, then solvents may need to be included as possible contaminants of concern
- Was there any shell reloading or management of the propellant/explosives at this site? If so, or if this can not be determined, then explosives and other metals associated with the propellants may need to be included as possible contaminants of concern
- Possible radiological concerns due to contaminant contribution from other sources, such as the 903 Pad need to be considered, since the presence of these contaminants may cause interference and safety concerns during the investigation of the East Firing Range

4 PAC NE-1408 (OU2 Test Well)
The appropriate values to compare to the detections listed in Table 3 2 are the Tier II Groundwater Action Levels The basis for the "Regulatory Limits" listed in the right-hand column is unclear

5 PAC NE-1409 (Interceptor Trench Pump House)
In Table 3 5, the superscripted "2" on the mean for the cadmium results should probably be a "3" The appropriate values to compare to the detections listed in this table are the surface water standards The reported mean values for cadmium, silver, carbon tetrachloride, tetrachloroethene, trichloroethene, and cyanide exceed those standards Neither this table nor the text locate this sampling station in relation to the PAC or explain the relationship of these analyses to the PAC

In Table 3 7, the correct values for the Surface Soil Tier I and Tier II Action Levels for methylene chloride are 7 63E+02 and 7 63E+04 respectively

6 PAC NW-170 (PU&D Storage Yard)
The levels of methylene chloride reported in Table 3 9 indicate an analytical system problem and even a potential risk to lab workers in some cases The significantly higher results for Boreholes #17797 and #18197 cannot be explained away as lab contamination

The recommendation for NFA on page 42 ignores the Subsurface Soil Tier II Action Level, the level at which contamination may leach into groundwater at levels which could impact surface water above the standards The statement that, "IHSS 170 poses no threat to either surface water or ground water, and therefore, is proposed for NFA" is not justified by the text An acceptable justification could include some of the information in the last paragraph in this section, which explains that a VOC plume has been identified and is being monitored under the Integrated Water Management Plan

7 PAC NW-174A (Drum Storage Facility)
The recently proposed geostatistical sampling methods could be applied to the detections of beryllium and vanadium to predict if and where additional sampling may be necessary

There is inadequate data to support the assertion that the contamination in IHSS 174A has stabilized as stated on page 54 BH17497 was not completed as a well nor included in the IMP, therefore, there is no trend data indicating the source to ground water is stable Please refer to CDPHE comments in correspondence on February 7, 2000

8 PAC 900-108 (Trench T-1)
The disposition of Trench 1 waste was part of the original milestone for this removal project Page 65 of this update states that this waste will remain in interim storage until an appropriate treatment process can be identified The status of this search for a treatment process should be reported, either in the next annual HRR update or in separate correspondence

9 PAC 900-1311 (Septic Tank East of Building 991)
Attempts should be made to calculate appropriate action levels for those contaminants lacking one, rather than compare concentrations to Region 3 values, which are based on ingestion only Alternative references for physical parameters (subsurface soil) and slope factors or toxicity factors (surface soil) could be used Since these contaminants have been detected in the environment at RFETS, these newly calculated action levels should be added to the RFCA Attachment 5 tables