



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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DENVER, COLORADO 80202-2466

Ref: 8HWM-FF

JUL 24 1992

Mr. Frazer Lockhart
Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE: Historical Release Report (HRR), June 1992

Dear Mr. Lockhart:

The above referenced document has been reviewed by the Colorado Department of Health (CDH), the U.S. Environmental Protection Agency (EPA), and its contractor, PRC Environmental. A number of the comments on the draft HRR that were submitted by the parties listed above were not satisfactorily addressed in the final HRR. Nevertheless, both agencies have agreed to approve this document on the condition that the enclosed list of comments be addressed in the first quarterly HRR update, scheduled to be submitted by October 1, 1992.

If you have any questions regarding these matters, please contact either Gary Kleeman at 294-1071 or Joe Schieffelin at 331-4421.

Sincerely,

Martin Hestmark, EPA
Manager
Rocky Flats Project

Gary W. Baughman, CDH
Unit Leader
Hazardous Facilities Unit

Enclosure

cc: Rich Schassburger, DOE
Toni Moore, EG&G



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1.0 INTRODUCTION

DOE's responses to EPA, CDH, and PRC comments were reviewed for completeness and technical adequacy. Comments that were addressed adequately are noted as such and are not discussed further. Comments that were inadequately addressed are discussed in further detail below. The review is organized into sections for EPA, CDH, and PRC responses. The numbering of the response review comments corresponds to numbering in EPA, CDH, and PRC comments.

2.0 RESPONSE TO EPA COMMENTS

The following sections provide a review of the DOE's Response to EPA comments on the draft HRR. The response review follows the EPA's numbering for the draft review and is divided into general and specific comments.

2.1 GENERAL COMMENTS

1. A map showing only the Individual Hazardous Substance Site (IHSS) locations that were changed in one color and their original Interagency Agreement (IAG) locations in a different color was not provided. Since many questions seem to arise regarding the differences between the IAG and the HRR, a figure such as this would be useful in documenting the changes.

Rationale: A figure would provide additional documentation for the differences between the IAG and the HRR.

2. DOE has not provided any maps or additional information regarding the locations of the potential incidents of concern (PICs) identified in the HRR. The DOE response to this comment indicated that an effort would be made to provide approximate locations of the PICs. Most of the PIC descriptions in Section 3.15 indicate that the exact locations of the occurrences could not be determined. However, in the Description of Operation or Occurrence for many of the PICs, an approximate location is specified (for example, "outside entrance to Building 750" or "in an unused production pit outside Building 776"). These approximate location descriptions should be used to generate an approximate location map.

Rationale: An approximate location map would provide clarification of the locations of PICs and help to identify incidents of concern that might need to be included in the operable unit investigations.

- 3 - 4. These EPA comments are addressed adequately.

2.2 SPECIFIC COMMENTS

- 1 - 3. These EPA comments are addressed adequately.

4. Page 900-19 to 21, PACs 900-119.1 and 119.2, Unit Names and Descriptions. DOE's response to EPA's comment regarding solvent storage at the East and West Metal Storage

Areas (PACs 900-119.1 and 119.2) generally disagrees with EPA's understanding. DOE provided very little additional information to clarify the operations at these PACs. Additional information and supporting data should be provided.

Rationale: As specified in the IAG, complete documentation of events at all IHSSs is required to assist in assessing remedial investigation and feasibility study (RI/FS) needs.

2.3 NEW COMMENTS

1. PIC 18 in the draft HRR, Oil Burning Pit East of Gate 6, does not appear in the final HRR and no explanation could be found for this change.

Rationale: An explanation should be provided for any PIC removed from the draft HRR.

3.0 RESPONSE TO CDH COMMENTS

The following sections provide a review of the DOE's Response to CDH comments on the draft HRR. The response review follows CDH's numbering for the draft review and is divided into general and specific comments.

3.1 GENERAL COMMENTS

1. The operable units (OU) for the IHSSs have been corrected, with the exception of 300-212, 700-215, and NE-216.2-3. IHSS 300-212, listed as OU10 in Fate of Constituents Released to Environment, page 300-24, should be correctly listed as IHSS OU15. IHSS 700-215 is listed as part of OU9 in IHSS Reference Number and Fate of Constituents Released to Environment, page 700-70, but should be listed as OU15. NE-216.2 and NE-216.3 are listed as part of OU6 in Fate of Constituents Released to Environment and should be listed as part of OU2 (NE-216.1 is part of OU6).

Rationale: Operable unit designations should be consistent throughout the report to avoid confusion.

2. This CDH comment is addressed adequately.
3. All PACs and under building contamination (UBC) sites were added to the figures, with the exception of NW-195 (Figure NW-1) and 500-169 (Figure 500-1). These PACs should be added to their respective figures.

Rationale: Figures should contain all PACs referenced in the report for consistency.

4. Rationale for the PAC location changes (outlined in green on figures) has been provided for all of the affected PACs with the exception of NE-110, 400-129, 600-120.1-2, 700-123.2, 700-150.3, and 800-102. The rationale for changing these PAC locations is unclear. Explanation for the location changes should be provided.

Rationale: Documentation and explanation of changes from the IAG should be provided in the HRR.

5. This CDH comment is addressed adequately.

3.2 SPECIFIC COMMENTS

1. Section 2.3.2. This CDH comment is addressed adequately.
2. Section 2.3.4. DOE's response to the CDH comment regarding clarification of Appendix F (Summary of Events) was addressed adequately in the response only. This clarification should be duplicated in Section 2.3.4, page 2-10, to clarify the intent of the discussion.

Rationale: Tracking criteria for indoor events should be clearly identified to avoid confusion.

3. Section 3.0. This CDH comment is addressed adequately.
4. Table 3-1. This CDH comment is addressed adequately.
5. References. The CDH comment regarding the Section 5.0 reference was not addressed. The reference to Section 5.0, page 3-29, should be changed to refer to Appendix A.

Rationale: References should be accurate to promote unity of the document.

6. PAC NE-156.2 - SW-168. These CDH comments are addressed adequately.
7. PAC 100-196. PAC 100-196 has been deleted from Figure 100-1. PAC 100-196 should be included in Figure 100-1.

Rationale: Figures should contain all PACs referenced in the report for consistency.

8. PAC 700-1 - 900-1300. These CDH comments are addressed adequately.
9. Section 3.14. This CDH comment is addressed adequately.
10. Section 3.15. DOE has not provided any maps nor additional information regarding the locations of the PICs identified in the HRR. The DOE response to this comment indicated that an effort would be made to provide approximate locations of the PICs. Most of the PIC descriptions indicate that the exact locations of the occurrences could not be determined. However, in the Description of Operation or Occupance for many of the PICs, an approximate location is specified (for example, "outside entrance to Building 750" or "in an unused production pit outside Building 776"). These approximate location descriptions should be used to generate an approximate location map.

Rationale: An approximate location map would provide some correlation between PICs and would help identify areas of concern that might need to be included in the operable unit investigations.

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4.0 RESPONSE TO PRC COMMENTS

The following sections provide a review of the DOE's response to PRC comments on the draft HRR. The response review follows PRC's numbering for the draft review and is divided into general and specific comments.

Several new PAC numbers in the final HRR have been changed from the Draft HRR. PACs 300-701, 300-703, 300-709, and 300-710, were changed. An explanation regarding these changes should be provided to avoid confusion.

4.1 GENERAL COMMENTS

- 1 - 3. These PRC comments were addressed during a meeting between DOE and EPA on April 16, 1992, and will be included in quarterly updates.
4. This PRC comment is addressed adequately.
5. This PRC comment is addressed adequately.

4.2 SPECIFIC COMMENTS

1. Page 2-3, Section 2-3. The list of file repositories on page 2-3 still does not match the list provided in Appendix B. All the file repositories identified in the HRR should be specifically addressed in Appendix B.

Rationale: Appendix B should contain a description of all HRR file sources to enhance the utility of the document.

2. This PRC comment is addressed adequately.
3. Date(s) of Operation or Occurrence, page 3-28. The comment regarding inconsistent reporting of dates found in this section and in Appendix E, Precode Sheet Instructions, Date From and To, was not addressed. The text on page 3-28 should be modified for consistency with the Precode Sheet Instructions.

Rationale: The text and supporting appendices should be consistent to avoid confusion.

- 5 - 29. These PRC comments are addressed adequately.
30. Plate 2. Rationale has been provided for all PAC boundary modifications with the exception of NE-110 and 400-129. Explanations of why NE-110 and 400-129 boundaries have been modified should be provided.

Rationale: Documentation and explanation of changes from the IAG should be provided in the HRR.

- 31 - 32. The PRC comments are addressed adequately.

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