

Brooks, Laura

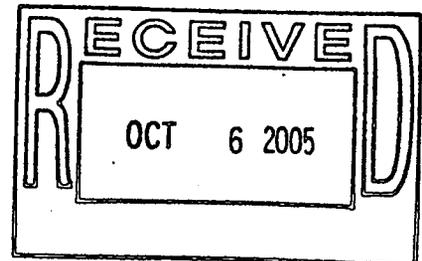
From: Aguilar.Mark@epamail.epa.gov
Sent: Tuesday, October 04, 2005 12:37 PM
To: Brooks, Laura
Cc: Ross.Lorraine@epamail.epa.gov; Garcia.Sam@epamail.epa.gov;
Kimmel.Larry@epamail.epa.gov; Smith.Patricia@epamail.epa.gov; Spreng, Carl; David
Kruchek
Subject: Alternatives Comments



Draft DAA Tech
Memo.EPA Commen...

Laura, per our conference call this morning, here are EPA's Comments.

C. Mark Aguilar
Project Manager, Rocky Flats
303.312.6251
(See attached file: Draft DAA Tech Memo.EPA Comments 4Oct05.doc)



ADMIN RECORD

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**EPA Comments for Draft Corrective Measures Study-Feasibility Study
Detailed Analysis of Alternatives Technical Memorandum
September 20, 2005**

General Comments

1. Reduction of Toxicity, Mobility and Volume through Treatment are distinctly different processes and actions should be presented separately.
2. Please note that both the Comprehensive Risk Assessment (CRA) and the Present and the Original landfill documents (i.e. Closeout and Maintenance and Monitoring Reports) are currently in regulatory review and conclusions may be subject to change.
3. Please remove all references to groundwater treatment systems "operating properly and successfully" throughout the text and tables.

Specific Comments

1. **Page 7, Section 3.1.2, Number 3.** Please revise the sentence regarding prohibition of pumping groundwater to include "... where the remedy may be impacted."
2. **Page 7, Section 3.1.2, Number 4.** The statement "No excavation is allowed at the Present and the Original Landfill." should be listed as a separate institutional control from the more general restrictions on subsurface excavation.
3. **Page 10, Section 3.3.1, Number 6.** Please revise the first sentence to read as follows "Groundwater actions are performing as designed by removing contamination in captured groundwater to meet appropriate surface water quality standards." In addition, the final sentence regarding water quality protection should also include groundwater quality protection.
4. **Page 11, Section 3.3.2, Number 2.** The sentence "At sentinel wells . . . the RI conclude that based on the environmental conditions and type of residual contamination, no further action can be taken." Please revise the conclusion ". . . no further action can be taken" to state ". . . no additional feasible action can be taken."
5. **Page 13, Section 3.3.4, Number 2.** Please remove the second sentence "Groundwater plume treatment systems have been implemented and remove contaminant loading to surface water." This issue is addressed on page 14, number 5.

6. **Page 14, Section 3.3.5, Numbers 1, 2, and 3.** Please remove all three bullets.
7. **Page 16, Section 3.4.4.** Please remove the sentence "In addition, TMV will be reduced by institutional controls. . ."
8. **Page 18, Section 3.5.** Please remove redundant "that have".
9. **Page 18, Section 3.5.2.** Please add a sentence indicating that potential air impacts will be mitigated.
10. **Page 20, Section 4.1.1.** The last sentence on this page "In conclusion for this criterion, Alternative 2 . . ." should be removed.
11. **Page 21, Section 4.1.2.** In the first sentence, please delete "however, . . . the lowest cost."
12. **Page 22, Section 4.1.5.** In the second sentence, please change "high risks" to "increased risks". In addition, please revise the final sentence to read as follows ". . . Alternatives 1 and 2 provide the most short-term effectiveness."