

Comment No.	Comment	Response
Colorado Department of Public Health & Environment (CDPHE) Comments		
General Comments		
None		
Specific Comments		
1	Section 8.0 – Further distinctions should be made in the third paragraph between how risk assessments are performed under CERCLA and CHWA risk policies. The CERCLA-based risk assessment performed in the CRA was for the anticipated future land users – a restricted use. CHWA risk management policies focus on determining if unrestricted use – based on 10-6 risk to a resident – is appropriate. These policies may be better explained in CDPHE’s Corrective Action Guidance Document (2002) and Environmental Covenant guidance than in the 1994 reference cited.	The following footnote will be added in Section 9.1: “CDPHE guidance requires evaluation of contaminant concentrations on a solid waste management unit or release site basis. As discussed in Section 1.2.3, this was implemented at RFETS on an IHSS-by-IHSS basis during the accelerated action process. As noted in Section 1.4.3, by addressing cumulative impacts from multiple release sites, the CRA’s exposure unit approach complements, but does not supplant, the CHWA’s emphasis on individual release sites. Because the parties had anticipated using institutional controls consistent with the anticipated future use of the site, CDPHE determined that a post-remediation analysis of residual risk on a release site basis was not necessary.”
2	Section 8.3 – Please make changes as discussed in previous comments. Please modify this discussion and Figure 8.5 to address the difference between naturally-occurring and potentially site-generated exceedances of MCLs.	Section 8.3 (now Section 9.3) will reflect the results of Section 4.0, Nature and Extent of Groundwater Contamination. The original Section 9.6 that described the OU reconfiguration will be moved to this section. This includes original Table 9.3 that provides information for each groundwater sample location where MCLs were exceeded in the reconfigured BZ OU. Known information regarding whether an exceedance may be caused by actual site-derived contamination vs. naturally-occurring exceedances, or otherwise not associated with site-generated contamination (such as from well casings), is provided in the table.
3	Section 8.3 – The statement in the last paragraph that groundwater ingestion is an incomplete pathway implicitly assumes a use restriction that needs to be analyzed in the	The following statement will be added to section 9.0 after the paragraph on the HHRA: “Because the CRA does not evaluate an unrestricted scenario,

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	FS/CMS. Other use restrictions are also implicit in other incomplete exposure pathways described in Section 2.2.4 of Volume 2 of Appendix A.	but instead evaluated potential risk to the anticipated future user (wildlife refuge worker and wildlife refuge visitor), the assumptions used in the CRA human health calculations, including the assumptions used in calculating WRW PRGs, need to be embodied in an institutional control.”
4	Section 8.4 –This discussion needs to recognize that surface water is supposed to meet surface water standards everywhere on site, not just at the POCs or terminal ponds. This section should also acknowledge that contaminants have been identified at levels above surface water standards.	The fourth sentence in Section 8.4 (now Section 9.4) will be modified as follows: “No surface water AOIs exceed the surface water standards at any surface water POC or at the terminal ponds upgradient of the POCs; however, surface water sample results do not always meet Colorado surface water quality standards for some analytes at some on site monitoring locations upstream of the terminal ponds.”
5	Section 8.6 – The discussion of COCs, AOIs, and PRGs is difficult to follow and understand. This discussion needs to better explain the purpose of COCs in this document and their relationship to AOIs. References to appropriate sections elsewhere in the document should be included.	Please see Section 1.4. No change made.
6	Section 8.6 – As noted above, the CRA approach to risk management addresses CERCLA requirements, not CHWA/RCRA. So, while there are no subsurface COC’s under the CRA Methodology, there is residual subsurface soil hazardous constituent contamination that requires an institutional control to ensure compliance with CDPHE risk goals, and that should be addressed in the FS/CMS. The assumption of a restricted use (refuge) requires the same analysis under CERCLA.	Please see response to CDPHE specific comment 1 and 3.
7	Section 8.7 – These conclusions do not appear to be clearly drawn from this section. Please list the specific AOIs to be carried forward into the FS. Why aren’t surface water and associated AOIs included?	The specific analytes that are carried forward into the FS are identified in this section. A new bullet will be added as follows: “Surface water upstream of the terminal ponds where some surface water sample results do not always meet Colorado

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		surface water quality standards for some analytes.”
8	Table 8.1 – May need to modify this table based on previous comments.	Table 8.1 (now Table 9.1) will be updated to reflect the comments.
	Editorial Comments	
1	Section 8.2 – Add “anticipated” in front of “future levels of ambient air” in the last sentence of the second paragraph.	Change made.
2	Section 8.3 – In the last 2 sentences of the second paragraph, using “are” instead of “were” would indicate that the comparing was done as part of this report as opposed to previous reports.	Change made.
Environmental Protection Agency (EPA) Comments		
General Comments		
1	Based on previous EPA comments regarding discussion of AOIs and ecological risk, it is recognized that Sections 8 through 10 will require modification; therefore, comments on that issue have not been submitted for Sections 8-10.	A response will be provided pending resolution of the issue.
2	Surface water is cited as being above standards at various locations throughout the site. RFCA says surface water standards needs to be met everywhere on the site. Therefore, surface water needs to be carried forward in the FS.	Please see response to CDPHE specific comments 4 and 7.
3	Because asbestos remains in the Present Landfill (PLF), please include text that provides for ongoing containment of asbestos.	No change made. Asbestos was not identified as an AOI, COC, or ECOPC. Section 8.3 (now 9.3) states that post-closure care and monitoring of the Present Landfill will continue. Please note that the ARAR related to asbestos at the Present Landfill will be brought forward into the discussion on key ARARs.
Specific Comments		
1	Page 8-2, Last Paragraph. This section discusses contaminants of concern (COCs) and ecological contaminants of potential concern (ECOPCs) identified using processes outlined in the referenced Comprehensive Risk Assessment (CRA) Methodology. For improved readability, EPA recommends that a brief synopsis of the CRA methodology be included in this section or in the introductory section of this document.	A new section (Section 7.0) will be drafted and included in the RI/FS Report that summarizes the CRA process and results.

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2	Page 8-3, Section 8.2, 2nd Paragraph, Last Sentence. The sentence states "Remediation of radionuclides in surface soil through accelerated actions should, in the long run, further reduce airborne radionuclide concentrations." Because accelerated actions have been completed (past action), this sentence is not appropriate for this section. Please delete this sentence.	Change made.
3	Pages 8-5 and Page 9-7, last sentences of first full paragraphs. These pages state that groundwater RAOs are not met, but that "at this time, no other alternatives... are feasible or practicable." Please provide the rationale for this conclusion from the Groundwater IM/IRA.	Section 8.0, Contaminant Fate and Transport, provides the rationale for this conclusion which is consistent with the conclusions from the Groundwater IM/IRA.
4	Page 8-11. The reference for the Groundwater IM/IRA discussed in Section 8 is omitted. Please add this document to the list of references.	Change made.
5	Table 8.1, Page 2 of 4. In the column labeled "Results of RFI-RI", the surface water nature and extent states that an "... FS is not required ..." However, the next column, Areas to be Evaluated in CMS-FS, states "... surface water contamination exceeds surface water standards..." This appears to be conflicting and should be corrected in the revised document.	The table will be revised to be consistent with response to CDPHE specific comments 3 and 7.
Editorial Comments		
1	Page 8-5, 1st Full Paragraph. In the sentence "All enhancements are intended to reduce the inventories of potential groundwater contaminants...", please change "inventories" to "concentration".	The sentence will be revised as follows: " All The one-time enhancements are intended to reduce the inventories of potential groundwater contamination and/or reduce the migration of contaminated groundwater that could impact surface water quality."
2	Page 8-9, 4th Paragraph, 2nd Sentence. In the sentence "Arsenic concentrations in this EU is similar to background concentrations.", please change "is" to "are".	Change made.
3	Several figures in Sections 8, 9, and 10 are repeats from Section	The figures that are repeated were considered key to

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	7 and previous sections. Please consider removing redundant figures as these sections of the document are revised.	understanding proposed OU boundary changes and what institutional controls were needed without having the reader flip back and forth between these key sections. Because there are not many figures and the information contained on them is vital to understanding the alternatives considered by the RFCA Parties, no change will be made.
U.S. Fish and Wildlife Service's (USFWS) Comments		
	General Comments	
	None	
	Specific Comments	
	None	
	Editorial Comments	
	None	