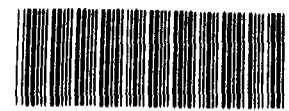


# ER/WM&I DDT



000100105

**Source/Driver:** (Name & Number from ISP, IAG milestone, Mgmt. Action, Corresp. Control, etc.)

**Closure #:** (Outgoing Correspondence Control #, if applicable)

**Due Date**

J. P. Schmuck

**Originator Name**

G. DiGregorio

**QA Approval**

J. E. Law

**Contractor Manager(s)**

L. Butler

**Kaiser-Hill Program Manager(s)**

A. D. Rodgers

**Kaiser-Hill Director**

**Document Subject:**

TRANSMITTAL OF CORRESPONDENCE DOCUMENTING COMPLETION OF THE ADMINISTRATIVE TRANSFER SEEP AND GROUNDWATER MONITORING OBLIGATIONS TO THE INTEGRATED MONITORING PLAN - JEL-117-98

KH-00003NS1A

July 2, 1998

Please find enclosed four (4) copies of correspondence documenting completion of the administrative transfer of seep and groundwater monitoring obligations to the Integrated Monitoring Plan. The completion of the administrative transfers finalizes the process begun last summer when the OU1 and OU2 IM/IRA modifications were conditionally approved. Two of the enclosed copies are for Kaiser-Hill review and two copies are for transmittal to DOE for review and submission to EPA.

If you have any questions or comments please contact John Schmuck at extension 4092.

Enclosures:  
As Stated

JPS/aw

cc:  
R. Cirillo  
R. Fiehweg  
F. Huffman



DRAFT

July 6, 1998

Tim Rehder  
U.S. Environmental Protection Agency  
999 - 18<sup>th</sup> Street, Suite 500  
Denver, CO 80202-2466  
Mail Code 8EPRF

ADMINISTRATIVE TRANSFERS OF OU1 AND OU2 MONITORING OBLIGATIONS

The Department of Energy Rocky Flats Field Office (DOE-RFFO) is submitting this correspondence to complete the modifications to the OU1 and OU2 Interim Measures/Interim Remedial Actions (IM/IRA) decision documents that were initiated last summer. Specifically, each of the IM/IRA modifications included administrative transfers. The completion of these administrative transfers will be documented in this correspondence.

OU2 IM/IRA Modification

As you are aware, on July 11, 1997 EPA approved a modification to the *Final Surface Water Interim Remedial Action Plan Environmental Assessment and Decision Document South Walnut Creek Basin*, October, 1994 (OU2 IM/IRA). The OU2 IM/IRA Modification had three primary objectives: to create a stand-alone decision document for the reactive metal treatment system at the Mound Site Plume; to administratively transfer the monitoring obligations for Seeps SW061 and SW132 to the Integrated Monitoring Plan (IMP); and to eliminate all OU2 IM/IRA authority over the Consolidated Water Treatment Facility (CWTF) in B891.

The first objective was met when the Mound Site Plume Decision Document was approved in September 1997. Installation of the reactive metal treatment system is underway.

For the second objective, EPA conditioned completion of the OU2 IM/IRA administrative transfers upon actual transfer of the monitoring obligations to the IMP. To document the transfer of the long-term monitoring obligations for Seeps SW061 and SW132 we have attached page 2-45 of the Draft IMP for your reference. In parallel, the operator of the CWTF has relinquished responsibility for sampling to the Rocky Mountain Remediation Services (RMRS) surface water group.

Although the IMP has not been finalized, we believe that the administrative transfer is complete. The IMP working groups have asserted authority over the monitoring and for the first time, the sampling is being conducted as part of the sitewide monitoring program. Consistent with the proposal, completion of the administrative transfers has given authority for all decisions related to the monitoring of Seeps SW061 and SW132 to the IMP.

In satisfaction of the third objective, completion of the administrative transfer terminates the OU2 IM/IRA and severs OU2 IM/IRA authority over the CWTF.

#### OU1 IM/IRA Modification

Similarly, on August 27, 1997 EPA conditionally approved a modification to the *Interim Measures/Interim Remedial Action Plan and Decision Document, 881 Hillside Area Operable Unit No.1*, January, 1990 (OU1 IM/IRA). The OU1 IM/IRA Modification had two primary objectives: to create a single, discrete identifiable regulatory authority that governs operation at the CWTF; and to administratively transfer monitoring obligations for the Collection Well, the French Drain, and the Building 881 Footing Drain to the IMP.

In the August 27, 1997 correspondence, EPA requested that DOE update Attachment 1 "the Chart" and Attachment 2. The updates requested by EPA related to proposed modifications to the OU1 Corrective Action Decision/Record of Decision (CAD/ROD). The Chart illustrated the elements of the original OU1 and OU2 IM/IRAs and the strategy for integrating the two modifications. The requested updates to the Chart have been incorporated (see the attachment), and the Chart is now entitled "Summary of Modifications to OU1 and OU2 IM/IRAs". In contrast, changes to Attachment 2 are not required. The language in Attachment 2 specifically recognizes the modifications to the OU1 CAD/ROD that are currently under development.

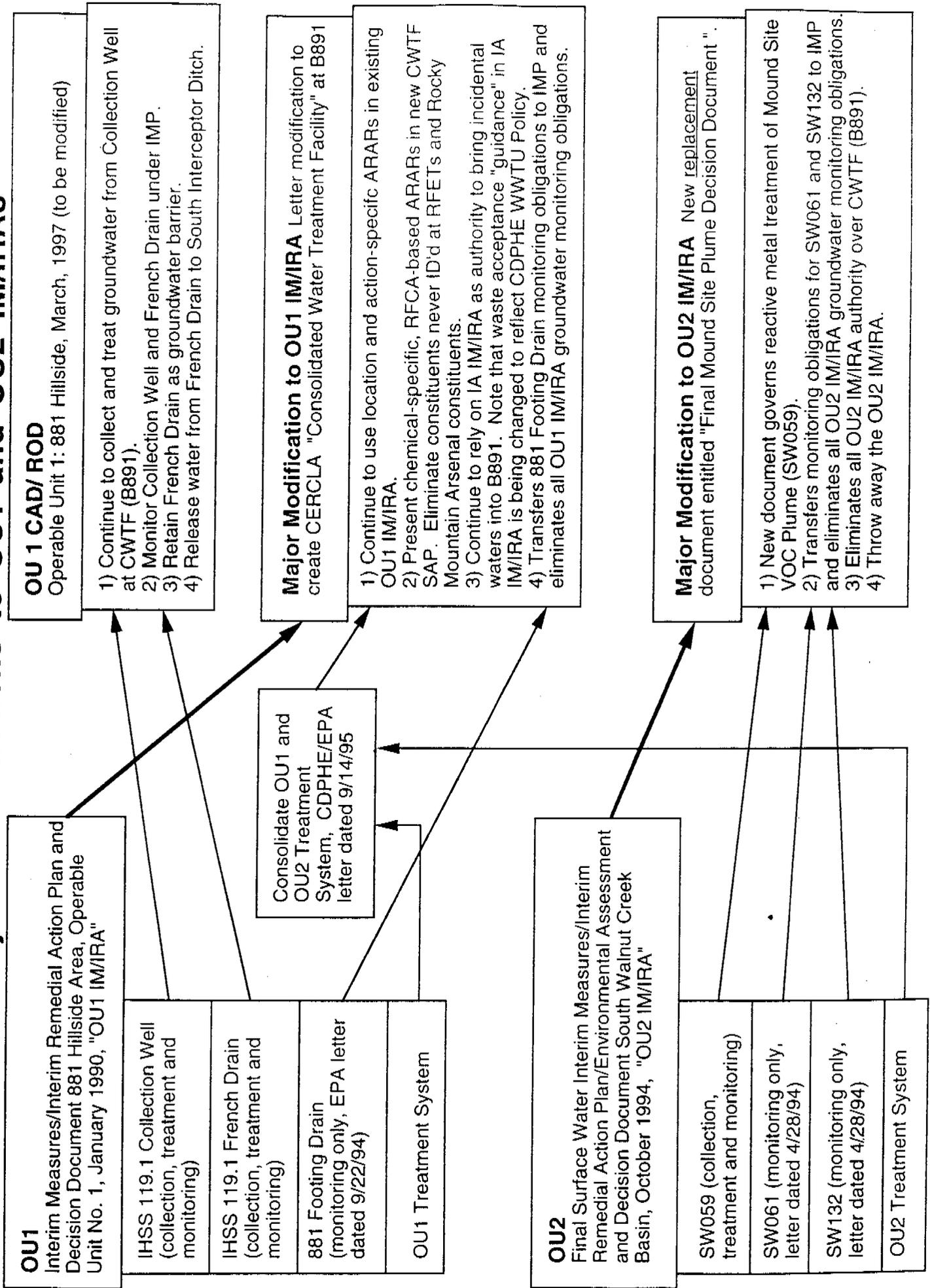
In response to the other comments contained in the August 27, 1997 EPA correspondence, DOE submitted a response dated October 2, 1997 and has modified Attachment 2 accordingly. For that reason, DOE believes it has met the first objective. To that end, the CWTF is currently being operated in accordance with the Sampling and Analysis Plan and Operational Framework provided in Attachment 2.

Like the OU2 IM/IRA Modification, the administrative transfer of monitoring obligations for the Collection Well (891COLWEL), the French Drain (891COLGAL), and the Building 881 Footing Drain (SW13494) have been transferred to the IMP. We have attached page 3-15 and E-2 of the Draft IMP for your reference. In parallel, the operator of the CWTF has relinquished responsibility for sampling to the RMRS Groundwater Group.

Consistent with the proposal, completion of the administrative transfers has given authority for all decisions regarding monitoring of the Collection Well, the French Drain, and the Building 881 Footing Drain to the IMP. It should be noted that for the time being this sampling is being performed on a quarterly basis, consistent with the original OU1 IM/IRA. This will continue until these sample locations are fully evaluated under the IMP.

To document completion of the administrative transfers, DOE requests that EPA provide written concurrence. If you have questions or comments please do not hesitate to call \_\_\_\_\_ at \_\_\_\_\_.

# Summary of Modifications to OU1 and OU2 IM/IRAS



## OU1

Interim Measures/Interim Remedial Action Plan and Decision Document 881 Hillside Area, Operable Unit No. 1, January 1990, "OU1 IM/IRA"

IHSS 119.1 Collection Well (collection, treatment and monitoring)

IHSS 119.1 French Drain (collection, treatment and monitoring)

881 Footing Drain (monitoring only, EPA letter dated 9/22/94)

OU1 Treatment System

## OU2

Final Surface Water Interim Measures/Interim Remedial Action Plan/Environmental Assessment and Decision Document South Walnut Creek Basin, October 1994, "OU2 IM/IRA"

SW059 (collection, treatment and monitoring)

SW061 (monitoring only, letter dated 4/28/94)

SW132 (monitoring only, letter dated 4/28/94)

OU2 Treatment System

## OU1 CAD/ROD

Operable Unit 1: 881 Hillside, March, 1997 (to be modified)

- 1) Continue to collect and treat groundwater from Collection Well at CWTF (B891).
- 2) Monitor Collection Well and French Drain under IMP.
- 3) Retain French Drain as groundwater barrier.
- 4) Release water from French Drain to South Interceptor Ditch.

## Major Modification to OU1 IM/IRA

Letter modification to create CERCLA "Consolidated Water Treatment Facility" at B891

- 1) Continue to use location and action-specific ARARs in existing OU1 IM/IRA.
- 2) Present chemical-specific, RFCA-based ARARs in new CWTF SAP. Eliminate constituents never ID'd at RFETs and Rocky Mountain Arsenal constituents.
- 3) Continue to rely on IA IM/IRA as authority to bring incidental waters into B891. Note that waste acceptance "guidance" in IA IM/IRA is being changed to reflect CDPHE WWTU Policy.
- 4) Transfers 881 Footing Drain monitoring obligations to IMP and eliminates all OU1 IM/IRA groundwater monitoring obligations.

## Major Modification to OU2 IM/IRA

New replacement document entitled "Final Mound Site Plume Decision Document".

- 1) New document governs reactive metal treatment of Mound Site VOC Plume (SW059).
- 2) Transfers monitoring obligations for SW061 and SW132 to IMP and eliminates all OU2 IM/IRA groundwater monitoring obligations.
- 3) Eliminates all OU2 IM/IRA authority over CWTF (B891).
- 4) Throw away the OU2 IM/IRA.

Consolidate OU1 and OU2 Treatment System, CDPHE/EPA letter dated 9/14/95

DRAFT

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE

INTEGRATED MONITORING PLAN

May 1998

Responsible Organization: Environmental Management & Compliance

Effective Date:  
May 1998

Periodic review frequency: 1 year from the effective date

Reviewed for  
Classification/UNCI:

By \_\_\_\_\_

Date \_\_\_\_\_

Best Available Copy

- The specific project plan must specify an adequate monitoring method.
- Acceptable Decision Error Rates for Statistical Sampling Design:
  - The specific project plan must specify the decision criteria. Examples are shown in the decision rule section, above.

*Monitoring Requirements:*

Monitoring details will be specific to the project. The projected Performance monitoring to take place in FY98 is given in Table 2-9. Analyte suites and sample collection protocols are project-specific and are contained in the individual project plans for automated locations and are contained in the Surface Water Monitoring Technical Design Document which can be obtained from RMRS WM&T personnel. The Performance monitoring for FY99 will depend on Site closure activities and schedules.

**Table 2-9  
Projected FY98 Performance Monitoring Locations**

Location Code	Location Description	Project	Supporting Documentation
GS27	Small ditch NW of B884	D&D of B889; Watershed Improvements evaluation	SW Monitoring Technical Design Document
GS32	Corrugated metal pipe (1.5') north of Solar Ponds in PA draining B779 area	D&D of B779	SW Monitoring Technical Design Document
GS37	Central Ave. Ditch north of B443	D&D of B123	SW Monitoring Technical Design Document
GS39	Corrugated metal pipe (1.0') north of 904 Pad draining 903/904 Pads and Contractor Yard areas	ER projects for 903 Pad; also serves as Source Location monitoring station for GS10 Source Evaluation	SW Monitoring Technical Design Document
SW061 <sup>20</sup>	S. Walnut Creek upstream of B995	OU2 Closure	OU2 Closure Document
SW132	S. Walnut Creek, outfall of culvert draining 700 and 900 Areas, south of B995	OU2 Closure	OU2 Closure Document

<sup>20</sup> The inclusion of SW061 and SW132 monitoring in the IMP completes the OU2 IM/IRA administrative transfer of former OU2 monitoring.

- Boundary Monitoring Wells: Wells used to monitor the quality of groundwater leaving the eastern Site boundary.

In addition to this general groundwater monitoring scheme, specific requirements support regulatory directives. The following special categories are included as groundwater program elements:

- D&D Monitoring Wells: Wells used to monitor releases to groundwater from D&D activities on specific buildings. This requirement is specified in the IM/IRA for the Industrial Area (DOE, 1994a).
- Performance Monitoring Wells: Wells used to monitor the effect of a remedial treatment or source removal action. Performance monitoring of source remediation is specifically required in the RFCA ALF for groundwater. The French Drain Performance Monitoring Wells are included in this category and are specified in the French Drain IM/IRA Plan (DOE, 1992).
- RCRA Compliance Wells: Wells used in upgradient and downgradient monitoring of RCRA interim status units. This requirement is specified under 6 *Code of Colorado Regulations* (CCR) 1007-3. Wells monitored at the new landfill would be specified under 6 CCR 1007-2. Future retrievable storage facilities would also fall under the RCRA monitoring category.

The ALF also lists specific analytes and the associated action level or standard for groundwater and surface water. Groundwater currently needs to meet water protection standards. For purposes of DQO development, the RFCA requirements for groundwater to support the surface water protection classification, and all DQO decisions will reflect this. Each component of the groundwater program can be considered a decision element, and decision statements have been created for each component.

#### 3.4.2.1 Plume Definition Wells

##### *Problem Statement:*

Are contaminants within groundwater plumes increasing in concentration with time or reaching Tier I Action Levels with the potential to impact surface water?

##### *Problem Scope:*

Plume definition wells lie within the currently known groundwater contaminant plumes and are located appropriately to monitor groundwater pathways that could affect surface water. Plume definition wells are designated based on knowledge of existing groundwater contaminant plumes and particle flow models that simulate groundwater pathways. It is possible that some plume definition wells have historically exceeded Tier I Action Levels. For these wells, only new exceedances of Tier I Action Levels involving

APPENDIX E-1  
PROPOSED MONITORING WELLS

WELL NO	FREQUENCY	CLASSIFICATION	PLUME/AREA	DRIVERS	FORMATION	PURPOSE
5387	Semiannual	PE	881 Hillside	RFCA	AL	Plume Extent south of the 881 Hillside Plume
4887	Semiannual	PE	881 Hillside	RFCA	AL	Plume Extent south of the 881 Hillside Plume
4787	Semiannual	PE	881 Hillside	RFCA	AL	Plume Extent south of the 881 Hillside Plume
00787	Semiannual	PM	881 Hillside	RFCA	AL	Performance Monitoring for 881 Footing Drain Sump
11092	Semiannual	PM	881 Hillside	RFCA, IM/IRA, FD	AL	Performance Monitoring for the French Drain
10792	Semiannual	PM	881 Hillside	RFCA, IM/IRA, FD	AL	Performance Monitoring for the French Drain
10692	Semiannual	PM	881 Hillside	RFCA, IM/IRA, FD	AL	Performance Monitoring for the French Drain
10592	Semiannual	PM	881 Hillside	RFCA, IM/IRA, FD	AL	Performance Monitoring for the French Drain
0487	Semiannual	PD	881 Hillside	RFCA	AL	Plume Definition well for the 881 Hillside Plume
891COLGAL	Quarterly	PM	881 Hillside	RFCA/IMIRA, FD	NA	Performance Monitoring of groundwater in collection sump in French Drain
891COLWEL	Quarterly	PM	881 Hillside	RFCA/IMIRA, FD	AL	Performance Monitoring of groundwater in collection well on 881 Hillside
SW13494	Quarterly	PM	881 Hillside	RFCA/IMIRA, FD	NA	Performance Monitoring of groundwater in footing drain seep below Bldg. 881
6286	Semiannual	PD	903 Pad	RFCA	AL	Plume Definition well monitoring pathway to Woman Cr. in the 903 Pad/Ryans Pt Plume
3087	Semiannual	PD	903 Pad	RFCA	BD/U/S/HU	Plume Definition well monitoring pathway to Woman Cr. in the 903 Pad/Ryans Pt Plume
2987	Semiannual	PD	903 Pad	RFCA	BD	Plume Definition well monitoring pathway to Woman Cr. in the 903 Pad/Ryans Pt Plume
23196	Semiannual	PE	903 Pad	RFCA	AL	Plume Extent well monitoring the southern migration of the Ryans Pit Plume
23096	Semiannual	PE	903 Pad	RFCA	AL	Plume Extent well monitoring the southern migration of the Ryans Pit Plume
07391	Semiannual	PM	903 Pad	RFCA	AL	Plume Extent well monitoring the southern migration of the Ryans Pit Plume
00491	Semiannual	PD	903 Pad	RFCA	AL/BD	Plume Definition well monitoring effects of remediation downgradient of Ryans Pt
02297	Semiannual	DD	Bldg 779	RFCA/IMIRA	AL	D&D monitoring downgradient of Bldg. 779
02497	Semiannual	DD	Bldg 779	RFCA/IMIRA	AL	D&D monitoring downgradient of Bldg. 779
02397	Semiannual	DD	Bldg 779	RFCA/IMIRA	AL	D&D monitoring downgradient of Bldg. 779
22996	Semiannual	DD	Bldg 886	RFCA, AIP	AL	D&D monitoring upgradient of Bldg. 779
41691	Semiannual	B	Boundary	RFCA, AIP	AL	Boundary Well - in the Walnut Cr. Drainage at the Indiana Street Boundary
41591	Semiannual	B	Boundary	RFCA, AIP	AL	Boundary Well - in small drainage near east access gate
10394	Semiannual	B	Boundary	RFCA, AIP	AL	Boundary Well - in the Woman Cr. Drainage at the Indiana Street Boundary
10294	Semiannual	B	Boundary	RFCA, AIP	AL	Boundary Well - in drainage below Pond D-2 in the southeast corner of the Site
0396	Semiannual	B	Boundary	RFCA, AIP	AL	Boundary Well - in small drainage east of the Site at Indiana St.
P219189	Semiannual	PD	Carbon Tet	RFCA, RCRA	BD/U/S/HU	Plume Definition well for VOC contamination coming from Carbon Tet Plume
P209389	Semiannual	PD	Carbon Tet	RFCA, RCRA	AL	Plume Definition well for VOC contamination coming from Carbon Tet Plume
P208289	Semiannual	PD	Carbon Tet	RFCA, RCRA	BD	Plume Definition well in the Carbon Tet Plume
12191	Semiannual	PM	East Trenches	RFCA	AL	Plume Definition well in the Carbon Tet Plume
23296	Semiannual	PE	East Trenches	RFCA	BD/U/S/HU	Performance Monitoring at edge of T3 soil excavation
10194	Semiannual	PE	East Trenches	RFCA	AL	Plume Extent well monitoring the northern migration of the East Trenches Area Plume
06091	Semiannual	PE	East Trenches	RFCA	AL	Plume Extent well monitoring the southern migration of the East Trenches Plume
05091	Semiannual	PE	East Trenches	RFCA	AL/BD	Plume Extent well monitoring the northeast migration of the East Trenches Plume
04991	Semiannual	PE	East Trenches	RFCA	AL	Plume Extent well monitoring the eastward migration of the East Trenches Plume
04591	Semiannual	PE	East Trenches	RFCA	AL	Plume Extent well monitoring the eastward migration of the East Trenches Plume
04091	Semiannual	PE	East Trenches	RFCA	AL	Plume Extent well monitoring the southward migration of the East Trenches Plume
03991	Semiannual	PE	East Trenches	RFCA	AL	Plume Extent well monitoring the northward migration of the East Trenches Plume
11891	Semiannual	PM	East Trenches	RFCA	AL	Plume Definition well monitoring the East Trenches Plume
3687	Semiannual	PM	East Trenches	RFCA	BD/U/S/HU	Performance Monitoring well monitoring effects of remediation downgradient of Trench T-3
12681	Semiannual	PM	East Trenches	RFCA	BD/U/S/HU	Performance Monitoring well monitoring effects of remediation downgradient of Trench T-4
05691	Semiannual	PM	East Trenches	RFCA	BD/U/S/HU	Performance Monitoring well monitoring effects of remediation downgradient of Trench T-4
05391	Semiannual	PM	East Trenches	RFCA	AL	Performance Monitoring well monitoring effects of remediation downgradient of Trench T-4
10994	Semiannual	PD	IA/Old Landfill	RFCA	AL	Plume Definition well monitoring eastward concentration of VOCs from the East Trenches Plume
7086	Semiannual	PE	IA/Old Landfill	RFCA	AL	Plume Extent IA VOA Plume/Old Landfill Plume near Woman Cr.
P416889	Semiannual	PD	Ind. Area	RFCA, IM/IRA for IA	AL	Plume Extent well monitoring IA Plume and Old Landfill Plume pathway in Woman Cr.
P416789	Semiannual	PD	Ind. Area	RFCA, IM/IRA for IA	AL	Plume Definition of IA Plume south of Bldg. 864 along pathway to Woman Cr.
P416689	Semiannual	PE	Ind. Area	RFCA, IM/IRA for IA	AL	Plume Extent to monitor southern migration of IA Plume south of Bldg. 440
P314289	Semiannual	PE	Ind. Area	RFCA, IM/IRA for IA	AL	Plume Extent to monitor the southern migration of IA Plume near Bldg. 951