



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8
999 18TH STREET - SUITE 500
DENVER, CO 80202-2466

* Copy for T. Greenyard

* EPA letter (G. Klemm)
DOE on Dec. 29, 1999.

Ref: 8EPR-F

Mr. Joe LeGare
Department of Energy
Rocky Flats Field Office
P.O. Box 928
Golden, CO 80402-0928

Re: OU1 CAD/ROD Amendment Recommendations

Dear Mr. LeGare:

EPA has reviewed the above referenced document and has the following comments regarding the recommendations expressed by DOE for OU1. In general, EPA agrees with the proposed changes to the OU1 groundwater collection and treatment system but there is one area with which the agency cannot concur.

Discontinuing use of the collection well at this time is, in our view, not a prudent or environmentally responsible action. Although the reported concentrations of TCE found in the groundwater collected by this well have dropped below Tier I levels, there is still a notable fluctuation in the concentrations and in two of the past three quarters, the results have been greater than 90 percent of the Tier I value. After reviewing the data that has been gathered since 1992 from numerous wells and the French Drain, it appears that this is a fairly small plume of contaminated groundwater that is being significantly reduced in concentration by simply collecting it from this location. Discontinuing this action now would probably result in the plume remaining around Tier I values for quite a long time period. It would also increase the likelihood of the plume spreading over a larger area that will no longer be protected downgradient by an intact French Drain. In addition, it is quite common to see groundwater contaminant concentrations increase in response to "turning off" remedial actions such as this.

Conversely, if DOE continues to remediate groundwater by collecting it from this well, the downward trend in TCE concentration might continue along the projected slope shown on your enclosed graph, which could result in achieving consistent Tier II values by the year 2003. Since this water is only being collected once a week and it is transported a very short distance to the Consolidated Water Treatment Facility (scheduled to remain online until 2005), very little cost savings would be realized by discontinuing this remedial action.

ADMIN RECORD
BZ-BZ-A-00202



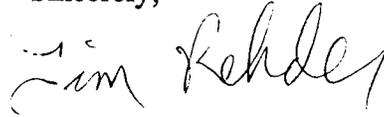
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In summary, a commitment to continued operation of the collection well is a necessary condition for the near term of OU1, and without this, approval of the CAD/ROD Amendment will not proceed. If you have any comments or questions regarding these matters, please contact Gary Kleeman at 312-6246.

Sincerely,

A handwritten signature in cursive script that reads "Tim Rehder". The signature is written in dark ink and is positioned to the right of the word "Sincerely,".

Tim Rehder, Manager
Rocky Flats Project

cc: Norma Castaneda, DOE
Carl Spreng, CDPHE
Steve Gunderson, CDPHE
Dave Shelton, Kaiser-Hill
Lane Butler, Kaiser-Hill
Steve Singer, RMRS