

CORRES. CONTROL
OUTGOING LTR. NO.
DOE ORDER #

98-RF01617

DIST.	LTR	ENC
ENSUSSEN, STAN		
ORMOLINI, ANN		
RAILSFORD, MARV		
URDGE, LARRY		
ARD, BOB		
ARDING, WYNN		
ILL, JOHN		
ARTINEZ, LEN		
ARKER, ALAN		
ILLER, ROBERT		
JOR, NANCY		
DORHEIS, GARY		

owe, Steve		
odahl, Tim		
edgers, Alan		
erson, Scott		
iber, Lane	X	X
engard, Tom		
ihn, Steve		
kle, Gordon		
nnedy, Colburn		
oud, Russ		
land, Jennifer	X	X

RES.CONTROL	X	X
WIN RECRD/116	X	X
IS/1130G		

CLASSIFICATION:
UNCLASSIFIED
CONFIDENTIAL
SECRET
AUTHORIZED CLASSIFIER
SIGNATURE:
mpt per CEX-266-95
REPLY TO RFP CC NO.:

ACTION ITEM STATUS:
PARTIAL/OPEN
 CLOSED
LTR APPROVALS:

RIG. & TYPIST INITIALS:
JLB :bag
3469 (Rev. 3/98)



March 30, 1998

98-RF-01617

Norma Castaneda
ES&H Program Assessment
DOE, RFFO

TRANSMITTAL OF THE TECHNICAL MEMORANDUM NO.1, MONITORED NATURAL ATTENUATION OF IHSS 118.1, REV. 0 - JLB-003-98

Please find enclosed four copies of the **Final Technical Memorandum No.1, Monitored Natural Attenuation of IHSS 118.1, Rev. 0** for transmittal to the Colorado Department of Public Health and the Environment (2 copies) and the Environmental Protection Agency (2 copies) (draft transmittal letter enclosed). An additional four copies have been enclosed for the Department of Energy's (DOE) use. The document has been revised based on DOE comments. A written comment response is attached.

This transmittal fulfills the RFFO performance measure to "Submit a Decision Document for IHSS 118.1" by March 31, 1998.

If you have any comments regarding this correspondence, please contact me at extension 5245.

J. L. Butler
Waste & Remediation Operations

JLB:bag

Original and 1 cc - N. Castaneda

Enclosures:
As Stated (2)

Kaiser-Hill Company, L.L.C.
Courier Address: Rocky Flats Environmental Technology Site, State Hwy. 93 and Cactus, Rocky Flats, CO 80007 • 303.966.7000
Mailing Address: P.O. Box 464, Golden, Colorado 80402-0464

ADMIN RECORD

I118.1-A-00009

DRAFT

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Mr. Steve Gunderson
Manager Rocky Flats Program
Colorado Department of Public Health and the Environment
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Mr. Tim Rehder
U.S. Environmental Protection Agency, Region VIII
999 - 18th Street, Suite 500, 8EPR-FT
Denver, Colorado 80202-2466

Gentlemen:

Please find enclosed two copies of the Final Technical Memorandum No.1, Monitored Natural Attenuation of IHSS 118.1, Rev. 0. Per verbal conversations and agreements with the Colorado Department of Public Health and the Environment and the Environmental Protection Agency, this technical memorandum documents a monitoring strategy for Individual Hazardous Substance Site 118.1.

If you have any questions concerning this document please contact Norma Castaneda at (303) 966-4266.

Sincerely,

Steve W. Slaten
RFCA Project Coordinator

Enclosures (2)

Technical Memorandum No.1,
Monitored Natural Attenuation Of IHSS 118.1, Rev. 0

March 27, 1998

Response to the Department of Energy's Rocky Flats Field Office Comments on

**Draft Technical Memorandum No. 1, Monitored Natural Attenuation of IHSS 118.1,
March, 1998, RF/RMRS-97-094.UN**

Rick Di Salvo Comments:

1) **General** - Why is this a Tech Memo? Seems like its more properly characterized as an IM/IRA. Per RFCA paragraph 120, Tech Memos are for previously approved work, but the IGD goes into a little more detail in paragraph 3.19. Given that we have a milestone in FY'99, #M-7, are we proposing to eliminate that milestone or are we proposing to implement this approach to meet the milestone?

The relation and content of this Tech Memo to a specific approved document and to the milestone needs to be provided and discussed.

Response: Two meetings were conducted with the RFETS, Colorado Department of Public Health and the Environment (CDPHE) and the Environmental Protection Agency (EPA) to discuss the project approach and the milestone. At the last meeting all parties agreed to the change from an Interim Measure/Interim Remedial Action (IM/IRA) Plan to a Technical Memorandum because there was no longer sufficient scope to justify it as an interim action. The "action" now consists of monitoring and will be integrated into the Integrated Monitoring Plan (IMP), a previously approved document. References have been added to the document concerning its relationship to the IMP. The IMP serves as the approved document. This is to be documented in the next revision of IMP. This document follows the technical memorandum definition in Section 3.1.9 of the Interim Guidance Document. The following text will be added to the Introduction to explain why the document is a technical memorandum instead of an IM/IRA plan:

"A technical memorandum is being submitted instead of a Interim Measure/Interim Remedial Action Plan because the project approach is to monitor existing natural remedial processes as opposed to implementing an interim remedial action. This technical memorandum serves to document a remedial strategy that will be integrated into the current monitoring program conducted under the Integrated Monitoring Plan (IMP) (Kaiser-Hill, 1997), and therefore, is not a decision document."

The DOE, Kaiser-Hill, and the regulators are discussing whether this should still be a Rocky Flats Cleanup Agreement (RFCA) milestone. The FY 99 milestone (#M-7) will most likely be replaced with a different milestone. The Site has proposed numerous replacement milestones.

2) **Executive Summary and 1.0 Introduction** - It's not until late in Section 2 that the Tech Memo states that this spill is not impacting surface water. Its again only briefly stated elsewhere in the document. This is important to note up front to form a clear tie to the RFCA Attachment 5 approach to interim cleanup actions for subsurface soils and groundwater. To do this, I suggest adding a sentence or two in the Executive Summary and Introduction that the groundwater in the area of the spill is not used for any purpose and that carbon tet. (and fuel oil?) contamination is not impacting surface water in any measurable way. Point out that the proposed action is

"The samples were also analyzed for total petroleum hydrocarbons due to the dark brown color of the DNAPL samples, since pure-phase carbon tetrachloride is colorless. As shown in Table 2-9, the light nonaqueous phase liquid (LNAPL) is a semi-volatile hydrocarbon that is likely a fuel oil or fuel-like mixture of hydrocarbons such as Number 2 (Diesel) Fuel Oil. The original source of the LNAPL is unknown. Although there are numerous underground and above ground fuel oil tanks in the area, it does not appear that these tanks are a source of the diesel. These tanks were investigated as part of the Underground Storage Tank replacement program as described in Attachment 13 of RFCA. None of the soil samples taken from around these tanks had total petroleum hydrocarbon levels above 5,000 parts per million, and no further investigative or remedial activities are currently planned. Additional information on the fuel storage tanks will be released in a final closure report in the near future."

The following paragraph has been added to Section 3.3 concerning the project approach:

"The attenuation of lighter-phase hydrocarbons, tentatively identified as Diesel (No.2 Fuel Oil), will be addressed along with the heavier-phase chlorinated contaminants at IHSS 118.1. Some of the analytical indicators in Table 3-1 such as total organic carbon, alkalinity, dissolved methane, ...etc. will be used to evaluate the interaction between the diesel and the carbon tetrachloride. Downgradient monitoring will be used to determine whether natural attenuation is limiting the migration of the diesel."

4) Section 3.5 - The specific waste treatment and/or disposition plans must be included. Is any of the expected waste going to be mixed waste? If so, do LDR's apply? Just saying it'll be managed per ARAR's is not sufficient. It either meets LDRs, at which point it's compliant with storage requirements or it must be treated or be planned for treatment under the Site Treatment Plan, or as part of a CERCLA treatment process.

Response: The section on waste management has been revised to reads as follows:

"Remediation waste anticipated from drilling and sampling includes recovered DNAPL, contaminated drill cuttings, purge water, PPE, and development water from well installation. All wastes will be managed in accordance to the RFETS standard operating procedure for investigation derived materials (IDM under the existing IDM program), Field Operations (FO).29. Wastes generated as part of this proposed action will be characterized based on process knowledge, analytical results, and radiological screening. Based on FO.29, wastes, such as PPE, identified as non-radiological and non-hazardous will be disposed in a sanitary landfill. Purge water will be treated at the 891 centralized water treatment facility. It is anticipated that drill cuttings from wells near the source area will be managed as a RCRA hazardous waste and will be stored in a permitted unit until disposal."

Response: The following text has been added to the introduction:

“A technical memorandum is being submitted instead of a Interim Measure/Interim Remedial Action Plan because the project approach is to monitor existing natural remedial processes as opposed to implementing an interim remedial action. This technical memorandum serves to document a remedial strategy that will integrated into the current monitoring program conducted under the Integrated Monitoring Plan (IMP) (Kaiser-Hill, 1997), and therefore, is not a decision document.”