



R Z Houk  
ER SRG 05366

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MAY 11 1994

cc w/o attachment.  
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**RFO Comments**  
***Draft Final***  
***Water Quality Evaluation of Building***  
***881 Footing Drain Discharge***

Consider including a brief (1-2 sentence) explanation of the logic/convenience in using > 5% exceedances as point for discussion for comparisons to ARARs. This may not add much value to the report, but the regulators will probably comment on it.

Section 2.2 (Compliance section) p 2.5 through 2.31

In cases where there are differences between the IRAP ARAR and the current potential ARAR it would be clearer to always preface the term ARAR with either IRAP or current potential. In several cases where (I believe) you were referring to the IRAP ARAR you simply said stated ARAR. This was after you referred to both the IRAP and current potential ARAR in the preceding paragraph. Examples: PCE, methylene chloride, TCE, and for some metals.

Section 2.2.1.1 (methylene chloride) p 2.9

You indicate the 50% of the methylene chloride detections had B-qualifiers for the footing drain flow within the offset quotation from the RI report. You may consider stating this within the above discussion to better highlight this point.

Section 2.2.5.1 (NO<sub>3</sub>)

For consistency change: Only two of the 28 samples to Only 2 of the 28 samples.

Section 3 p 3.1 toward Bottom

The sentence: However, the capital investment in the OU1 treatment system need not be a complete waste of resources could be stated more positively such as would better utilize the existing resources, etc.

Section 4.2 (Recommendations) p 4.1

The statement: Contrary to information presented in the IRAP also seems negative without some further explanation. Consider giving this statement some explanation such as: Because better quantitative information is now available, these data contradict the information presented in the IRAP.

Section A.2.4 (State Ground Water Standards)

This section needs to be worded very carefully even though you state up front that these concepts do not represent the official position of the DOE. This discussion needs to be specifically caveated or de-emphasized so as not to give the impression that we totally accept the State Ground Water Standards. The DOE position is that sovereign immunity protects RFP from some state standards, particularly the ground water standards. Furthermore, the DOE is disputing that the state ground water standards were promulgated within the meaning of the NCP.