



COLORADO
DEPARTMENT
OF HEALTH

July 22, 1991



ROY ROMER
Governor

JOEL KOHN
Interim Executive Director

Mr. Fraser Lockhart
U. S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

4210 East 11th Avenue
Denver, Colorado 80220-3716
Phone (303) 320-8333

RE: PHASE II RFI/RI WORKPLAN (BEDROCK) FOR OU 2

Telefax Numbers:
Main Building/Denver
(303) 322-9076

Dear Mr. Lockhart,

Piarmigan Place/Denver
(303) 320-1529

First National Bank Building/Denver
(303) 355-6559

Grand Junction Office
(303) 248-7198

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), sent comments to DOE on the draft version of the above referenced document on May 3, 1991. Many of these comments asked for maps and figures presented in the text to be corrected and/or revised. The Division received the final version of this document on July 2, 1991 and after a cursory review, found that several of the figures in question had not been revised. This was communicated by phone to the staff of both DOE and EG&G. We then received the "Comment Disposition" document addressing our comments to the draft on July 18, 1991, less than two weeks before the scheduled document approval date, and more than half way through our review period. Unfortunately, the Division does not feel that the explanations provided in the "Comment Disposition" document are adequate reasons for not revising these figures. As we stated in our comments of May 3, the State will not approve this document until these figures are corrected. Therefore, we urge DOE and EG&G to present updated versions of the following figures as soon as possible so as not to impact the approval schedule for this RFI/RI:

1) Figure 1-6

We are well aware of the fact that this is a stratigraphic column and not a cross-section. However, we are also aware that within the lower Arapahoe Formation and upper and lower Laramie Formation portions of this column, discontinuous and lenticular sands are depicted. This column must be revised so that the upper Arapahoe sands are

depicted accurately and in a consistent manner with the lower sands.

- 2) Figure 1-10 The Division again states that this figure does a poor job of covering the study area let alone the surrounding areas. Many of the other figures in the text go south to Woman Creek, a drainage the Division believes far more important to this study than the central and northern tributaries of Walnut Creek. At a minimum, this figure should be revised to show Woman Creek.

- 3) Figure 2-2 Although improved, problems with this figure remain. The Division again asks that the 50' contours be bolded so that they stand out from the 10' contour lines. In addition, any contour line, once started, should continue across the entire map (i.e. the 5890' and 5850' contours). Furthermore, the 5925' contour fits into neither the 10' or 50' contour intervals and should be removed.

- 4) Figures 2-4 Now that the well-control data has been added to these figures, it can be seen that the sand outlines do not honor all of the sand data. This must be addressed, either by revising the figures or by adding text. In addition, the Division strongly disagrees with the current presentation of subcrops. The outlines shown on the maps are nothing more than guesses on where individual sands potentially subcrop. If the well control is sufficient to detail these areas, then it should also support a map of that particular sand instead of resorting to aggregate mapping. The Division believes there is very little well information that supports or limits the sub-crops to the areas shown. Even if the text were made more clear on what these maps represent in the way of sand extent and/or thickness, the subcrops would be misleading. The Division believes that if DOE and EG&G are going to map areas of stacked sands because individual sands are not sufficiently understood to support separate mapping, then the only logical method of mapping "potential" subcrops is to delineate a band completely across the sand limits on the maps at the appropriate stratigraphic and topographic levels where subcrops are most likely to occur.

- 5) Figure 2-6 Again, the Division recognizes the value of
Figure 2-7 presenting these cross-sections on a 1:1 scale.

Figure 2-8

We also appreciate your dilemma of graphical constraints. However, neither of these are reasons for these figures to be unusable. The Division asks that either the horizontal scale be changed or a set of additional copies of these same cross-sections be added to the document that are on a useable horizontal scale or reduced to the point that they fit entirely on one piece of 11 X 17 paper.

6) Figure 2-10

This figure should be consistent with revised versions of Figures 2-4 and 2-5.

7) Figure 2-21,
2-22, and
2-23

No matter where or how often these figures have been presented in the past, the well data that the contours are formulated from must be presented on these maps. As we stated before, no document with maps that omit this type of data will be approved by the Division. All documents should be considered to stand alone. Therefore, any contour maps included must show the data from which they were constructed.

The Division believes that this problem could have been avoided with better communication. All Division letters end with a contact person that can be called if additional clarification is needed. We encourage DOE to make use of this. We are happy to meet with DOE and EG&G personnel so that these types of problems can be solved before a document is resubmitted.

If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 331-4421.

Sincerely,



Gary W. Baughman

Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division

cc: Martin Hestmark, EPA
Brent Lewis, DOE
Tom Greengard, EG&G
Brooke Wilson, EG&G
Barbara Barry, RFPU