

DOE/RFO
CORRESPONDENCE
INCOMING LETTER

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

Room

DATE 2/23/94

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- BOE, A.H.
- BRAMAN, D.A.
- CHER, R.A.
- COOPE, G.R.
- CRIMAN, J.K.
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- STANTON, D.W.
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Richard Schassburger
Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, CO 80402-0928



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re: OU 2 Preliminary Draft
RI Report

Mr. Schassburger:

EPA has reviewed your January, 1994 Preliminary Draft sections of the Phase II RFI/RI Report for OU-2. Comments prepared by our review contractor, which raise several general issues of concern, are attached. We have not included editorial comments, but would like to note that numerous errors, omissions, and discrepancies exist in the material submitted. A sampling of these types of problems observed in the first few pages is also attached.

As agreed in our meeting on February 16, 1994, these comments are intended for your consideration in preparing the complete draft for submittal as required by the outstanding IAG milestone. A separate response to these comments is not required, and all comments should be considered in light of subsequent discussions which have further explored several of the issues we feel must be addressed in the complete draft. Revisions must also include incorporation of the changes as required by ongoing review of the risk assessment technical memoranda.

If you have questions about these comments or would like to discuss how they should be resolved, please contact Bill Fraser (PA) at 294-1081.

Sincerely,

Martin Hestmark, EPA
Manager
Rocky Flats Project

Scott Grace, DOE
Jen Pepe, DOE
Joe Schieffelin, CDH

DATE:

2/23/94

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EPA Specific Comments

Page 1-9, last paragraph. What is the composition of the "lathe coolant consisting of a straight-chain hydrocarbon mineral oil (Shell Vitrea)"? This is stated as being present in most of the drums that were stored at the 903 pad, and it is important to know the original composition of this oil and what its degradation products are.

Page 1-10, first full paragraph. Were aerial photos from 1967 used to try to determine where this ditch SSE of the pad was located? If not, they should be examined, and if the ditch is apparent, it should be correlated with sampling locations.

Page 1-13, past cleanups of lip site. A map should be provided that locates as precisely as possible, the three areas that were cleaned up as described here. This would be particularly useful in the Environmental Evaluation of OU 2, so that these areas can be compared with nearby areas that were not cleaned up to determine any differences in effects to biota.

Page 1-14, first paragraph. Trench T-2 is described here as being only about 20 feet long, but is shown in figure 1.3-3 as being closer to 200 feet long. Either the figure or the text must be revised to correct this discrepancy.

Page 1-16, first paragraph. If only the surface soil was subsequently sampled as stated here, how can the conclusion be made that radionuclide contamination was only present at the surface? This must be clarified or deleted.

Table 2.1-1, sheet 1. This table indicates that only 2 alluvial wells were installed in the Mound Area, but the work plan called for 20. Some explanation for this discrepancy must be provided.