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IAG milestone _____ 95RF07272 _____
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Document Subject:
 TRANSMITTAL OF THE RESPONSE TO COMMENTS FOR THE OPERABLE UNIT (OU) 2 DRAFT FINAL PHASE II RFI/RI REPORT (KH00003NS1A) – AMP-085-95.
 95-RM-ER-086-KH

Discussion and/or Comments:

Enclosed are the complete Environmental Protection Agency (EPA) and the Colorado Department of Public Health and Environment (CDPHE) comments on the OU 2 Draft Final Phase II RCRA (Resource Conservation and Recovery Act) Facility Investigation/Remedial Investigation (RFI/RI) Report and the proposed responses to these comments. The Draft Final OU 2 Phase II RFI/RI report was delivered to the Agencies on May 23, 1995. As almost all of the report had been previously reviewed by the Agencies, minimal comments were expected. However, 24 pages of comments were received from the EPA on August 3, 1995 and the 75 comments were received from CDPHE on August 24, 1995, about one month behind schedule. We have requested a one month extension of the Interagency Agreement milestone from September 21, 1995 to October 21, 1995 in order to incorporate these late comments and comment responses into the final document.

There were substantially more comments received than anticipated. As we have previously discussed, these comments are minimally addressed as necessary. Errors will be corrected and confusing passages will be clarified. However, where the comment would require substantial effort to fully address and incorporate, yet yield little if any changes in the report's conclusions, the comment response reflects that the RFI/RI report will not be changed.

Numerous comments were received from both the EPA and CDPHE on the risk assessment, modeling and data set used in the report. The OU 2 risk assessment was generated after detailing the work to be completed in four, required, risk assessment technical memorandum and one letter report. These technical memorandum detailed the data and the methodology to be used for the chemical of concern (COC) identification, modeling, exposure scenarios, toxicity assessment and the CDPHE screen letter report. These were all reviewed and approved by the Agencies prior to completion of the activity. The data set was proposed in the COC technical memo and approved by EPA and CDPHE.

The groundwater and surface water models proposed in the modeling TM were approved by EPA and CDPHE. Numerous presentations were made during the modeling process to keep everyone informed of the numerous small changes that are always necessary. The modeling efforts were designed to generate the most conservative risk numbers. Using these very simplistic and very conservative models, no elevated risk from

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As shown. The more realistic models requested are less conservative and will yield even less risk. Therefore, this approach is not recommended. The data set used in the report was previously approved in the process. While this data set ends 2 years ago, this large amount of data is still representative of OU 2 sites. More recent groundwater and surface water data is presented in the annual groundwater and surface monitoring reports. Recent trench data was not collected for and does not meet the data quality objectives for RFI/RI reports. This data will be presented in a separate report. The recent storm event data was not used for the RFI/RI report and also does not meet the data quality objectives for the report. The RFI/RI reports were designed to demonstrate normal to somewhat conservative conditions. The recent storm event data did not fall into this category. These results will also be presented separately.

The risk assessment comments dealt with the process of how the risk assessment was put together, regardless of whether or not the comment would impact the results of the risk assessment. Many of these comments had been previously addressed in meetings or in the technical memorandum comment responses. The comment has been dispositioned as appropriate in the comment response. However, comments that would change the results of the risk assessment were not incorporated into the risk assessment.

The determination that the bedrock was sufficiently characterized represents a major accomplishment. A Notice of Deficiency was issued for the Draft Phase II RFI/RI Report because the bedrock had not been characterized. An expedited, abbreviated field program was conducted, which relied heavily on the observational data. As a result, the conclusion was reached that there is no pathway through the bedrock. This comment implies that the conclusion has been accepted.

Direct any questions or comments to Robin Volk at extension 8645 or Annette Primrose at extension 8618.

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