

CORRES CONTROL  
INCOMING LTR NO



Department of Energy

ROCKY FLATS OFFICE  
P.O. BOX 928  
GOLDEN COLORADO 80402-0928

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ROCKY FLATS PLANT  
CORRESPONDENCE CONTROL

91-DOE-10686

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DATE

ACTION	DIST.	LTR	ENC
	BENJAMIN, A		
	BERMAN, H S		
	BRETZKE, J C		
	BURLINGAME, A.H.		
	COPP, R.D		
	CROUCHER, D W		
	DAVIS, J G		
	EVERED, J.E	X	
	FERRERA, D.W.		
	FRANCIS, G E		
	GOODWIN, R		
	HANNI, B.J		
	HEALY, T.J		
	DEKER, E H		
	JENS, J P		
	KERSH, J.M.	X	
	KIRBY, W A		
	KRIEG, D		
	KUESTER, A W		
	LEE, E.M.		
	MAJESTIC, J.R		
	MARX, G E		
	MEURRENS, B E.		
	MORGAN, R V		
	PIZZUTO, V M		
	POTTER, G L		
	RAFFELL, B F		
	RANDLIN, N B		
	REPLER, R L		
	SWANSON, F R		
	VIEBE, J S		
	WILKINSON, R.B.		
	WILSON, J M		
	WONG, E.R.		
	WANE, J O		

Mr. Martin Hestmark  
U S Environmental Protection Agency, Region VIII  
ATTN Rocky Flats Project Manager, 8HWM-RI  
999 18th Street, Suite 500, 8WM-C  
Denver, Colorado 80202-2405

Mr. Gary Baughman  
Hazardous Waste Facilities Unit Leader  
Colorado Department of Health  
4210 East 11th Avenue  
Denver, Colorado 80220

Gentlemen

Please find enclosed two (2) copies each of the Final RFI/RI Work Plan for Operable Unit No 3, IHSS's 199, 200, 201 and 202. This document meets the December 6, 1991 IAG schedule date for submitting this deliverable.

The Work Plan contains the rationale, arguments and changes discussed during a number of scoping meetings since the draft work plan was submitted, and addresses not only your comments, but comments and concerns expressed from peer review, such as the Technical Review Group.

DOE/RFO has thoroughly and thoughtfully considered the issue of analyzing for metals in off-site soils. The addition of metals to the list of contaminants of concern for IHSS 199 is not justified because:

- 1) Beryllium (Be) is the only nonradioactive metal for which a potential RFP source to the airborne pathway could be found. CDH measured Be levels in off-site soils in 1971 and 1989 and did not find elevated levels of Be,
- 2) Any contaminant plume identified in ongoing OU studies that could effect OU3 will be added to the field sampling plan. Field data from OU1 and 2 will be available prior to OU3 field work,
- 3) Metals will be included in drainage and reservoir sediment analysis where potential sources and surface water pathways exist;
- 4) The plutonium from the 903 Pad acts as an excellent tracer to determine extent of windblown contamination through the airborne pathway to off-site soils. Plutonium concentrations at the 903 Pad were reported as high as 30,000,000 d/m/g, but the highest plutonium concentration found after 20 years of OU3 study is 17 d/m/g. 17 d/m/g of plutonium 239/240 is approximately 0.0005 ppm in soil. To detect a metal contaminant increase to OU3 soils at a concentration of 0.5 ppm would require a source 1000 times larger than the plutonium concentration at the 903 Pad! No source of this magnitude exists or has existed.

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Reviewed for Addressee  
Corres Control RFP  
2-9-91 *li*

DATE BY

Ref Ltr #

ADMIN RECORD

A-0003-000046

The cost impact of analyzing for metals in soils at OU3 is estimated to be up to \$500,000. Given the very low probability of identifying metals contaminants in off-site soils and a finite budget for environmental cleanup activities at Rocky Flats, it would be more appropriate and the taxpaying public would be better served if RFP's limited funds were spent on higher priority tasks.

The air sampling program has been changed based on the presentation to EPA/CDH on November 5, 1991. The new program incorporates a wind tunnel to measure the resuspension potential of sediments and soils in OU3. Air samplers will also be used to evaluate the inhalation pathway for risk assessment. The specific details of the air program will be provided in a technical memorandum.

If you have any questions concerning this document, please feel free to contact Robert H. Birk of my staff at 966-5921

Sincerely,



David P. Simonson  
Assistant Manager  
for Environmental Management

Enclosures

cc w/Enclosures

A. Rampertaap, EM-453  
J Sparhawk, HAZWRAP  
B Thatcher, DOE/RFO  
B Brainard, DOE/RFO

cc w/o Enclosure

B Lavelle, EPA  
J Schieffelin, CDH  
M Guillaume, EG&G/RF