

CORRES. CONTROL  
INCOMING LTR NO.



Department of Energy

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

01483RF95

MAY 16 10 08 AM '95

DUE  
DATE

MAY 15 1995

95-DOE-08367

ACTION

EG&G  
ROCKY FLATS PLANT  
CORRESPONDENCE CONTROL

DIST.	LTR	ENC
BURLINGAME, A.H.		
CARNIVAL, G.J.		
CORDOVA, R.C.		
DAVIS, J.G.		
FENN, T.M.		
FERRERA, D.W.		
FRAY, R.E.		
GEIS, J.A.		
GILMARTIN, J.T.		
GINTHER, B.		
GLOVER, W.S.		
GOLAN, P.M.		
HEALY, T.J.		
HEDAHL, T.G.		
HILBIG, J.G.		
HOLLOWELL, L.J.	X	
JACKSON, D.T.		
KELL, R.E.		
LEINWEBER, S.A.		
MARX, G.E.		
MCGART, D.		
MCDONALD, M.M.		
MCGOVERN, L.J.		
MCKENNA, F.G.		
PAUKERT, J.G.		
PIZZUTO, V.M.		
SATTERWHITE, D.G.		
SCHRADER, D.C.		
SCHUBERT, A.L.		
STIGER, S.G.	X	
STROBEL, G.L.		
TURNER, K.A.		
VOORHEIS, G.M.		
Buddy M	X	
BARTHEL H	X	
SPENCE T	X	

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. Joe Schieffelin  
Hazardous Waste Facilities Unit Leader  
Colorado Department of Public Health and Environment  
4300 Cherry Creek Drive South  
Denver, Colorado 80222-1530

Gentlemen:

As a result of our April 25, 1995, meeting regarding the Colorado Department of Public Health and Environment (CDPHE) Conservative Screen letter report for Operable Unit (OU) 3, the following approach will be taken to address outstanding issues:

**Subsurface Soil (trench data)**

The maximum values for Pu and Am are found in surface soils. These values are used when considering all soils in OU-3. It will be clarified that all soil data were considered for use in the CDPHE conservative screen, but that the surface soil values which represent the maximum detected radioactivity were used in the screen, as specified by the CDPHE methodology.

Clarification will be presented regarding uranium isotope concentrations in the subsurface trenches. Background evaluation and spatial analysis for uranium isotopes will be included to support the discussion on page 2 of the Response to Comments (dated March 13, 1995) to show that the uranium levels are at background concentrations.

**Subsurface Sediments ( 239/240 Pu and 241 Am)**

The maximum values for 239/240 Pu and 241 Am will be carried through the CDPHE Conservative Screen for Mower Reservoir and Standley Lake. These values may be in the subsurface or surface sediments. These values will be carried through even though the weight-of-evidence evaluation on surface sediments determined that 239/240 Pu and 241 Am were not Potential Contaminants of Concern (PCOCs). Professional judgment will be used to add these elements back into the screen because they are site-related and further analysis provides a higher degree of confidence communicating risk to the public.

**Subsurface Sediments (metals)**

Since Standley Lake receives almost all of its water and sediment supply from Clear Creek, Standley Lake sediments will be evaluated to determine which associated metals are site-related, if any. Data is available from results of the OU-5 conservative screen and values from Mower Reservoir, which receives all of its water from the Woman Creek drainage. Any Rocky Flats derived contaminants associated with sediments from the Woman Creek drainage would be

CORRES. CONTROL	X	X
ADMN RECORD/080		
PATS/T130G		

Reviewed for Addressee  
Corres. Control RFP

5-16-95 RDM  
DATE BY

Ref Ltr. #

DOE ORDER # 5400.1

MAY 15 1995

M. Hestmark & J. Schieffelin  
95-DOE-08367

2

reflected in the Mower Reservoir sediment profile more strongly than in Standley Lake, due to the relative sediment contributions of Woman Creek to each reservoir.

The maximum value for each metal in the reservoir sediments for Mower Reservoir and Standley Lake will be evaluated to determine whether it occurs in the surface or subsurface sediments. If the maximum value for a metal occurs in the surface sediments, the metal will no longer be considered because surface sediments have already been evaluated through the screen. Those metals with maximum values in the subsurface sediments will undergo the following weight-of-evidence evaluation:

- a. Compare the maximum values to the Background Geochemical Characterization Report (BGCR) data. Any metals whose values exceed the BGCR values will be identified as PCOCs (means and maximums will be compared). Any additional OU-5 metal Contaminants of Concern (COCs) (not including the south interceptor ditch) will also be identified as PCOCs.
- b. Conduct a spatial analysis that includes sitewide data for each metal PCOC. This presentation will be an 11x17 inch map similar to the As sitewide map. If it can be demonstrated that these metal PCOCs are not site related, they will not be retained as PCOCs.
- c. Any remaining metal PCOCs will be carried through the remainder of the CDPHE Conservative Screen.

As discussed in the meeting, this approach should resolve the outstanding concerns expressed by CDPHE regarding subsurface media in OU-3. These evaluations will be presented in a letter format which will be submitted for CDPHE review within 2 to 3 weeks, and CDPHE will require 1 week to complete their review. Upon satisfactory review, the Department of Energy (DOE) will receive a letter of approval for the OU-3 Conservative Screen Letter Report.

DOE believes that the contents of this letter accurately reflect the approach agreed to at the conclusion of the April 25, 1995, meeting with CDPHE and the Environmental Protection Agency. If you have any questions, please call Robert H. Birk at 966-5921.

Sincerely,



Steven W. Staten  
IAG Project Coordinator  
Environmental Restoration

M. Hestmark & J. Schieffelin  
95-DOE-08367

3

MAY 15 1995

cc:

C. Gesalman, EM-453, HQ  
J. Ahlquist, EM-453, HQ  
L. Ekman, EM-452, HQ  
K. Klein, OOM, RFFO  
J. Wienand, ER, RFFO  
B. Birk, ER, RFFO  
D. George, ER, RFFO  
B. Lavelle, EPA  
M. Guillaume, SAIC  
S. Stiger, EG&G  
M. Buddy, EG&G  
T. Spence, EG&G  
H. Barthell, EG&G  
Administrative Record