

**Colorado Department of Health  
Hazardous Materials & Waste Management Division  
Comments On  
DRAFT FINAL TECHNICAL MEMORANDUM (No. 2)  
MODIFICATIONS TO FIELD ACTIVITIES  
(Addendum to Final Phase I RFI/RI Work Plan) For  
SOLAR EVAPORATION PONDS  
OU-4  
ROCKY FLATS PLANT  
MARCH, 1993**

**SPECIFIC COMMENTS**

**COMMENT 1**      Section 3.4: The discussion of "10 discrete samples to be located in areas of anomalous radioactivity" must be revised to reflect the revised approach as discussed in the status meeting of March 25, 1993. DOE's letter of April 29, 1993 (F. Lockhart to M. Hestmark and G. Baughman) provided a rationale and map locations for the ten sites. Once approved or modified, the final rationale and final map should be incorporated as a section into TM-2.

**RESPONSE**      Section 3.4 of the revised TM has been expanded into several subsections which describe the random surficial soil sample collection methodology, the discrete surficial soil sample methodology, and the surficial soil sample analytical suite. As requested, rationale for collection of the 10 discrete surficial soil samples and the final map from DOE's letter of April 29, 1993 have been incorporated into the revised TM in Section 3.4.2 and Figure 3-2, respectively.

**COMMENT 2**      Section 3.5.2: The Division acknowledges that the hole numbers from eight of twelve boreholes originally located in the ponds have been reassigned to interim boreholes. To prevent any misunderstanding on the part of DOE or the Division, the following revisions must be made to the TM-2 document:

- o      A total of twelve, not "up to twelve", boreholes have in fact been postponed pending the removal of sludge from Ponds 207C and the three 207B-Series ponds. Please modify the statement accordingly.
- o      All twelve postponed boreholes, three per pond, must be shown as tentative locations. These should be clearly differentiated on Figure 3-1 or possibly a new map. DOE may decide if the four previously numbered holes maintain the same number, assume new numbers or become numberless.

**RESPONSE**

The document has been reworded to indicate that the twelve boreholes initially planned to be drilled in the 207B-series ponds and Pond 207C have not been eliminated or reduced in number. As also requested, the tentative locations of these boreholes are shown on Figure 3-1, just as they appeared in the Phase I RFI/RI Work Plan. No new borehole numbers have been assigned to these planned boreholes. DOE intends to evaluate data obtained from recently drilled interim boreholes and Pond 207A boreholes to refine the tentative locations shown on Figure 3-1. After this evaluation, any recommendations DOE has for the placement of the pond boreholes will be the subject of future correspondence with the agencies.

**COMMENT 3**

Section 3.5.3: This section discusses the three boreholes that have been eliminated as deep bedrock borings. It would be helpful to state in the last paragraph of the section, page 3-11, that hole 44193 is the other deep borehole to be drilled and to provide the rationale for retaining the hole.

**RESPONSE**

As requested, a statement has been added to Section 3.5.3 indicating Borehole 44193 remains as a deep geologic borehole. The statement was added to the end of paragraph one of the section which outlines the approach for the five planned bedrock borings rather than the last paragraph, as suggested in the comment.

**COMMENT 4**

Section 3.5.5: Borehole 44493; Wells 3787 and 3887 in the vicinity of Pond 207B South were referenced to Figure A-1, please add these wells to the figure.

**RESPONSE**

Wells 3787 and 3887 have been added to Figure A-1 as requested.

**COMMENT 5**

Section 3.6: Piezometer Bank PZ04; The discussion of the piezometer banks, although technically correct, is confusing. When trying to coordinate the discussion with Figure 3-1, one naturally groups the two northerly and the three southerly piezometers. This undermines the discussion; some slight alteration of the text would be appropriate and adequate.

**RESPONSE**

The text description has been revised to more clearly describe the placement of piezometers at PZ04. Slight revisions in piezometer configuration were necessary since the Draft TM was prepared. The rationale for the change is included in this revised TM.

**COMMENT 6**

Section 3.7: The Division acknowledges the specification of Cyanide and Sulfide as the two remaining inorganics of interest. It is the Division's understanding that other inorganics of interest are accounted for in the other analytical suites (i.e. Nitrates, etc.).

**RESPONSE**

The Division is correct in their understanding that cyanide and sulfide are the components of the "inorganic" parameters, and that other inorganics, including TAL metals and nitrate, are also being analyzed. The text in Section 3.7 has been revised to clarify the analytical suite.

**COMMENT 7**

Section 4.0: Although the Division appreciates the insights into the expected schedule slippage it is inappropriate to a "technical" memorandum. Consequently, Section 4.0 and Figure 4-1 must be removed from document. General references to delays in water and sludge removal and, therefore, the need to modify the work plan are appropriate and may remain in the document.

**RESPONSE**

Portions of Section 4.0 that referred to schedule and Figure 4-1 have been removed from the document as requested.