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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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

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EG&G  
ROCKY FLATS PLANT  
CORRESPONDENCE CONTROL

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DIST.		
BENEDETTI, R.L.	X	X
BENJAMIN, A.		
BERMAN, H.S.		
CARNIVAL, G.J.		
COPP, R.D.		
CORDOVA, R.C.		
DAVIS, J.G.		
FERRERA, D.W.		
HANNI, B.J.		
HEALY, T.J.		
HEDAHL, T.G.		
HILBIG, J.G.		
KIRBY, W.A.		
KUESTER, A.W.		
LEE, E.M.	X	X
MANN, H.P.		
MARX, G.E.		
McKENNA, F.G.		
MORGAN, R.V.		
PIZZUTO, V.M.		
POTTER, G.L.		
RILEY, J.H.		
SANDLIN, N.B.		
SATTERWHITE, D.G.		
SCHUBERT, A.L.		
SETLOCK, G.H.		
SHEPLER, R.L.		
SULLIVAN, M.T.		
SWANSON, E.R.		
WILKINSON, R.B.		
WILSON, J.M.		
ZANE, J.O.		

Ref: 8HWM-FF

Mr. Gary Baughman  
Colorado Department of Health  
4300 Cherry Creek Drive South  
Denver, CO 80222-1530

RE: TM #2 - Modifications to Field Activities  
for OU 4, the Solar Ponds

Dear Mr. Baughman:

EPA has completed its review of the subject document and feels that adequate rationale supporting the proposed technical changes to the RFI/RI Workplan was presented. The attached comments express EPA's additional technical concerns and clarification on the purpose of this Technical Memorandum (TM). EPA expects DOE to submit responses to these comments. We do not believe that the comments require changes to the proposed technical program. Therefore, EPA recommends approval of the subject document as it pertains to the technical field program presented. The anticipated schedule impacts and RI report deficiencies discussion are not appropriate to include within the TM and are not approved. Any changes to the OU 4 schedule must be addressed in accordance with the procedures and terms established in the IAG.

Please do not hesitate to contact Arturo Duran of my staff at (303) 294-1080 with any questions or comments you may have.

Sincerely,

Martin Hestmark, Manager  
Rocky Flats Program

Attachment

- cc: Richard Schassburger, DOE
- Frazer Lockhart, DOE
- Scott Surovchack, DOE
- Ed Lee, EG&G
- Randy Ogg, EG&G
- Joe Schieffelin, CDH
- Harlen Ainscough, CDH
- Arturo Duran, EPA

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Reviewed for Addressee  
Corres. Control RFP

4-22-93  
DATE BY

Ref Ltr. #

ADMIN RECORD

**EPA Comments on the Technical Memorandum #2  
Modifications to the Final RFI/RI Workplan**

Section 1.2, Purpose and Overview, page 1-2. The primary purpose of this TM #2 is to address technical issues regarding the OU 4 field investigation. Other issues related to anticipated **schedule impacts** and RI report **deficiencies** must be addressed according to the procedures and terms established in the IAG and are not appropriately included in this TM.

Section 3.1, Radiological Survey, page 3-1. EPA wants to take this opportunity to provide DOE with direction on the concept of background values and the role in the Risk Assessment. Background values should not represent or be impacted by contamination. Special care **must** be taken in defining background areas. Using radioactive readings and chemical analysis of samples taken in areas adjacent to OU 4 to represent background value is inappropriate and unacceptable to EPA.

Background values should be used only in defining the nature and extent of contamination at the site and in selecting the Contaminants of Concern (COCs) in the Risk Assessment. Background values can not be subtracted from the contaminants' concentration level that are to be used in the Risk Assessment.

Section 3.3, Geophysical Survey, 3-2. The fact that Ground Penetrating Radar (GPR) was ineffective in locating piping or buried objects in the existing Solar Ponds, does not mean that efforts to locate these features should be discontinued. EPA still believes that the location of subsurface structures and potential hazards to drilling are necessary to facilitate completion of the RFI/RI.

The Final RFI/RI workplan for OU 9, the Original Process Waste Lines, Section 7.3, discusses a three-stage approach for buried pipeline investigation. This approach describes a set of alternative techniques for locating buried pipelines. EPA suggests that DOE use these techniques in areas where GPR is not effective in order to meet the objectives of the OU 4 geophysical survey. Also, DOE needs to evaluate alternate available techniques for identifying subsurface structures other than pipelines.

If subsurface structures that are known to be present could not be identified using the available geophysical techniques, DOE may need to excavate as a last resort.

Section 3.4, Surficial Soil sampling, 3-4. According to the Final RFI/RI Workplan, 10 discrete surface soil samples should be taken in areas of anomalous radioactivity as determined from the surface radiological survey. These surface soil samples were to be used to calibrate and verify the radiological survey. The radiological survey has already been completed without the collection of these 10 surface soil samples. During the meeting

held on March 25, 1993, it was agreed that these 10 surface soil samples would be collected as described below.

- A subset number of samples (at least 3 samples) will be taken in locations showing the highest radioactivity readings.
- A subset number of samples will be taken in areas where data gaps exist.
- A subset number of samples will be taken in areas where seeps were encountered.

EPA expects DOE to take the 10 surface soil samples following the agreed approach.

Section 4.0, Program Impact, page 4-1. In reviewing the schedule presented in Figure 4-1, it is apparent that DOE anticipates a one year delay for submittal of the Remedial Investigation (RI) report. This could result in EPA pursuing an enforcement action against DOE that may involve stipulated penalties for failure to meet an IAG milestone. DOE should consider submitting an extension request under the terms of the IAG for EPA and CDH review and approval.