

CORRES CONTROL
OUTGOING LTR NO

26449



EG&G ROCKY FLATS INC
ROCKY FLATS PLANT P O BOX 464 GOLDEN COLORADO 80402-0464 (303) 966 7000

DOE ORDER# A700.1

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DIST	TR	ENC
AMARAL M E		
BURLINGAME A H	✓	
BUSBY W S		
BRANCH D B		
CARNIVAL G J		
DAVIS, J G		
FERRERA D W		
FRAY, R E		
GEIS J A		
GLOVER, W S		
GOLAN, P M		
HANNI, B J		
HARMAN, L K		
HEALY, T J		
HEDAHL T		
HILBIG, J G		
HUTCHINS, N M		
JACKSON, D T		
KELL, R E		
KUESTER, A W		
MARX, G E		
McDONALD, M M		
McKENNA, F G		
MONTROSE, J K		
MORGAN, R V		
POTTER, G L		
PIZZUTO, V M		
RISING, T L		
SANDLIN, N B		
SCHWARTZ, J K		
SETLOCK, G H		
STEWART, D L		
STIGER, S G	✓	
TOBIN, P M		
VOORHEIS, G M		
WILSON, J M		
EC TRAFFIC	✓	✓
LABICHER	✓	✓
R. Wignarowicz	✓	✓
L. Brooks	✓	✓
J. Hopkins	✓	✓
CORRES. CONTROL	X	X
ADMN RECORD/080	✓	✓
TRAFFIC		
PATS/T130G		

September 28 1994

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Jessie M Roberson
Acting Assistant Manager for
Environmental Restoration
DOE RFFO

Attn Kurt Muenchow

OPERABLE UNIT (OU) 5 WOMAN CREEK PRIORITY DRAINAGE FEASIBILITY STUDY/
CORRECTIVE MEASURES STUDY SGS 526 94

Action Transmit information to the Environmental Protection Agency (EPA) and the
Colorado Department of Public Health and Environment (CDPHE)

The Feasibility Study/Corrective Measures Study (FS/CMS) for Operable Unit 5 (OU5)
will begin at the end of September 1994 This letter summarizes the approaches that will
be used in evaluating and selecting remedial options for the Individual Hazardous
Substance Sites (IHSSs) located within OU5 The approaches described below are
consistent with the recent discussions between the Environmental Protection Agency
(EPA) the Colorado Department of Public Health and Environment (CDPHE) and the
Department of Energy (DOE)

Original Landfill and Filter Backwash Pond

A presumptive remedy approach will be used for evaluating and selecting remedial options
for the Original Landfill (IHSS 115) and the Filter Backwash Pond (IHSS 196) which are
located within the boundary of the Original Landfill This focused FS will be conducted
in accordance with EPA s Presumptive Remedy guidance for CERCLA Municipal Landfills
(EPA 540 F 93 035) and related guidance Per this guidance a streamlined or limited
risk assessment that is focused on OU5 groundwater will be conducted (see Attachment 1)
Specifically chemically specific Applicable or Relevant and Appropriate Requirements
(ARARs) such as Maximum Contaminant Levels will be compared with groundwater
contaminant concentrations Any exceedances in these ARAR values will indicate the need to
implement a presumptive remedy

In addition to the presumptive remedy study a slope stability analysis of the Original
Landfill site will be completed This analysis will be based on geotechnical data collected
during implementation of the Addendum to the Field Sampling Plan for the Remedial
Investigation (Technical Memorandum 15) The results of the slope stability analysis will
provide data that will be useful in designing a landfill cover (i.e grading terracing etc)

CLASSIFICATION

UCNI	
UNCLASSIFIED	✓
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER
SIGNATURE

NIA

DATE

IN REPLY TO RFP CC NO

NIA

ACTION ITEM STATUS

- PARTIAL/OPEN
- CLOSED

LTR APPROVALS

ORIG & TYPIST INITIALS

SB

ADMIN RECORD

A 0005-000437

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All Other OU5 IHSSs

The need for remedial action and the evaluation of remedial alternatives for OU5 IHSSs other than the Original Landfill and the Filter Backwash Pond will be addressed using baseline risk assessment and traditional CMS/FS methodology respectively. These sites include the Ash Pits (IHSSs 133 1 133 4) the former Incinerator Site (IHSS 133 5) the Concrete Wash Pad (IHSS 133 5) Detention Ponds C 1 and C 2 (IHSS 142 10 and 142 11 respectively) and three Surface Disturbance Areas (IHSSs 209 and two unnamed areas). Prior to conducting the baseline risk assessment each of these IHSSs listed above will first be examined using CDPHE conservative screen methodology. IHSSs identified by the screen as posing no significant risk will be eliminated from further risk assessment and feasibility study consideration. The results of the conservative screen and the IHSSs eliminated by the screen will be documented in Technical Memorandum 1.

Please contact Robert Cygnarowicz (966 8540) or Carol Bicher (966 9100) of my staff if you have any comments or questions regarding the planned CMS/FS and risk assessment approaches for OU5. We are anxious to begin this work and move toward the remediation/closure of OU5.



S G Stiger
Director
Environmental Restoration Program Division
EG&G Rocky Flats Environmental Technology Site

RC cb

Orig and 1 cc J M Roberson

Attachment
As Stated

cc
F R Lockhart DOE RFFO
M N Silverman DOE RFFO

**Risk Evaluations for Landfill Presumptive Remedies
September 1994**

In recent meetings between the Department of Energy (DOE) the Environmental Protection Agency (EPA) and the Colorado Department of Public Health and Environment (CDPHE) on Operable Units (OUs) 5 and 7 the parties have discussed in general risk based approaches to establishing the need to implement presumptive remedies for the landfills. This paper summarizes these discussions and states specifically EG&G's understanding of the methods we will use in developing these analyses. Both EPA and CDPHE personnel assigned to these OUs have agreed that quantitative risk assessment is not required to demonstrate the need for presumptive remedies. Their position is in accordance with EPA presumptive remedy guidance (*Presumptive Remedy for CERCLA Municipal Landfill Sites* EPA 1993) which calls for a streamlined or limited risk assessment focused on the most obvious problems at the landfill. The Agencies are also in agreement that the 'most obvious problem' and the focus of the evaluation of risks should be groundwater. For this medium chemical specific ARARs such as maximum contaminant levels (MCLs) are available and guidance states that where such standards are exceeded remedial action generally is warranted. The Agencies have agreed that a comparison of groundwater contaminant levels to ARARs (both State and Federal) will be sufficient to show the need for a presumptive remedy and EG&G will use this approach. Laura Brooks (EG&G Environmental Restoration) has compiled a list of these ARARs. According to guidance the degree to which ARARs are exceeded i.e. the estimated risk level associated with contaminant levels in groundwater may also be considered in initiating a response action. However the Agencies have not indicated that they expect such an evaluation and that the ARARs analysis would be acceptable.

Regarding OU7 CDPHE indicated that the risk based approach and format presented in the IM/IRA decision document for OU4 was sufficient. Dave Norbury of CDPHE has agreed to provide EG&G with the details of this approach. Agency contacts for OU5 did not provide a specific example of this type of evaluation but did state that the analysis should be focused and brief.

Following landfill closures residual risks for the landfill cap may need to be addressed in some fashion. This is expected to be an evaluation of upward pathways only i.e. exposure to soils and particulates released from soil. However it could also involve consideration of residuals from any treatment of volatile organics (e.g. methane) in soil if any such treatment is part of the remedy.

For OU7 the Agencies have provided information on risk assessment requirements excluding the landfill. For this OU the baseline risk assessment will not be conducted until after landfill closure and will only include that portion of the OU downgradient of the dam and/or outside of the cap. EG&G has not received such specific information on risk assessment outside of the landfill/filter backwash pond area for OU5 but the Agencies have stated that the disturbed areas ashpits and drainages will probably need to be included in a baseline risk assessment depending on the outcome of the CDPHE conservative screen and identification of source areas.