

Comment No.	Comment	Response
<b>Colorado Department of Public Health and Environment (CDPHE) Comments</b>		
<b>General Comments</b>		
1	As previously discussed, this report is somewhat hampered by referencing three different sets of values, each of which serves a different purpose. Clarifying somewhere up front the basis and purpose of the action levels, the AOIs, and the CRA process would greatly enhance the clarity of the document. Referring to the action levels and their application in the past tense and to the AOIs and the risk assessment in the present tense may help to make this distinction.	<p>Please note that the subsection numbering will be changed in the final version because information has been added or rearranged in response to comments.</p> <p>New clarifying language will be added in Section 1.3.3 for an explanation of the basis and purpose of action levels. A new Section 1.4, RFCA Post-Accelerated Actions: RCRA/CHWA RFI/CMS and CERCLA RI/FS Requirements Roadmap to the RI/FS Report), will be added for an explanation of the basis and purpose of AOIs and the CRA process.</p> <p>Action levels, their application, and RFCA accelerated actions will be referred to in the past tense and AOIs and the risk assessment will be discussed in the present tense throughout the RI/FS Report.</p>
<b>Specific Comments</b>		
1	<p><u>Section 1.0</u> – This section mentions some contaminants released to the environment. The Health Advisory Panel’s Dose Reconstruction Project identified 7 solvents, 10 metals (including rads), and 8 other constituents as “materials of concern.” Tasks 3 and 4 of that project documented where on site these materials were used and released (see <a href="http://www.cdphe.state.co.us/rf/projectasks34.htm">http://www.cdphe.state.co.us/rf/projectasks34.htm</a>). Although the list in this section is not intended to be comprehensive, it may be a good idea to acknowledge this publicly available and publicly scrutinized list – here or in Section 3.</p>	<p>The following new paragraph will be added to Section 1.0, (new Section 1.1.4) after the paragraph that begins with “As further summarized ...”:</p> <p>“A multi-year study by CDPHE’s Health Advisory Panel beginning in 1989 reviewed the types and quantities of chemicals historically used at RFETS, to determine potential offsite doses to the public from RFETS operations. This study concluded that seven solvents, ten metals (including certain radionuclides) and eight inorganic chemicals were materials of concern (CDH 1992).”</p> <p>The reference list for Section 1.0 will be revised to add: “CDH, 1992, Project Tasks 3 &amp; 4 Final Draft Report, Reconstruction of</p>

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		<p>Historical Rocky Flats Operations &amp; Identification of Release Points, Colorado Department of Health prepared by ChemRisk, August”</p> <p>Please note that as part of the RI work, the Health Advisory Panel’s Tasks 1-5 Reports, and other historical RFETS information, were reviewed to evaluate possible sources of analytes found in environmental media samples. The results of the review are documented in a White Paper, “Review of Historical Knowledge Related to Metals and Selected Radionuclides Identified as Environmental Media Analytes of Interest,” July 15, 2005. Where relevant, the White Paper is referenced in the nature and extent of contamination sections to summarize the RFETS historical uses and documented releases of a particular analyte. The White Paper is also referenced in the CRA as part of the professional judgment evaluation to determine whether a particular analyte is likely related to RFETS historical uses and should be retained for risk quantification.</p>
2	<p>Section 1.0, 4<sup>th</sup> sub-bullet under the 7<sup>th</sup> bullet – This bullet should more correctly state: “The Present Landfill Seep Treatment System, which collects and passively treats leachate emanating from the Present Landfill to remove ....”</p>	<p>The requested change will not be made. The current text reflects the language in the Present Landfill IM/IRA.</p>
3	<p>Section 1.1 – Please add a discussion regarding the RCRA RFI/CMS, as discussed previously in Section 1.0.</p>	<p>See response to Specific Comment 1.</p>
4	<p>Section 1.4.1 – RFCA – Please include a description of what RFCA stands for, “Rocky Flats Cleanup Agreement”</p>	<p>“RFCA” will first appear in Section 1.2.1.3. The tech editing convention for all acronyms, once defined, is to use the acronym thereafter.</p>
5	<p>Section 1.4.1, page 1-13 &amp; 14 – Please modify the discussion of Water Quality Status to reflect that currently there are and have been exceedances of water quality standards on site up-stream of the terminal ponds. This would include the high nitrate/nitrite levels seen in Walnut Creek below the Solar Ponds. Also please</p>	<p>The following sentence will be added in Section 1.2.1.3, in the Status discussion for item 3, Water Quality, after the sentence beginning with “Completed accelerated actions ...”:</p> <p>“However, surface water sample concentrations do not always</p>

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	correct the misspelled word in the last sentence of the 1 <sup>st</sup> paragraph, change “form” to “from”.	meet Colorado surface water quality standards for some analytes at some on site monitoring locations upstream of the terminal ponds.”  The typo “form” has been corrected to “from”.
6	Section 1.4.1, page 1-14 – Please change the Cleanup Guidelines Status discussion to recognize the presence of the remaining disposal facilities (landfills), as well as the remaining buried contaminated structures and sites.	The following sentence will be added in Section 1.2.1.3, in the Status discussion for item 4, Cleanup Guidelines, after the first sentence:  “Several areas containing wastes buried more than 30 years ago, two historical landfills with engineered covers meeting landfill closure criteria and some infrastructure and building slabs/basement walls below three feet from the surface remain. Infrastructure and building structures that have residual contamination are six feet or more below the ground surface.”
7	Section 1.4.2, page 1-20 – Please change the language in the last sentence of the 2 <sup>nd</sup> paragraph to read, “... CDPHE conducted further investigations to identify possible additional areas of interest and verify that all areas of interest have been identified as either PACs, UBC sites...”.	The following sentence will be added to the penultimate paragraph in Section 1.2.2.1  “In addition, CHPHE conducted further investigations to identify that all areas of interest were identified as PACs, UBC sites, or IHSSs (hereinafter referred to as ‘IHSSs’) (CDPHE 1999, 2003).”
8	Section 1.4.3, Buildings, page 1-28 – A) Please modify the 1 <sup>st</sup> sentence of the 2 <sup>nd</sup> paragraph to include hazardous substances as well as rads in the preliminary Typing determination. B) Please include the PDSP in the list of documents approved by the EPA and CDPHE in the 2 <sup>nd</sup> sentence. C) Please modify the Type 1 discussion to recognize that the presence of RCRA Units did not necessarily effect the Typing of Facilities, and that although RCRA Units were supposed to be closed, in practice RCRA units did not need to be closed for a facility to be considered a Type 1 facility (RLCR Type 1 concurrence by CDPHE did not equate to	This discussion will be in Section 1.2.3.3, with the comments addressed as follows.  A) To clarify this sentence, the parenthetical will be deleted.  B) Rather than revising the second sentence, the fourth sentence will be revised as follows:  “Prior to demolition of Type 2 or Type 3 buildings after decontamination, a Pre-Demolition Survey was conducted in

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	<p>approval that RCRA Units were closed), but that they would have to be properly closed prior to or during demolition.</p>	<p>accordance with the LRA approved Pre-Demolition Survey Plan and a Pre-Demolition Survey Report (PDSR) was prepared for LRA review and approval.”</p> <p>A new fifth sentence will be added as follows:</p> <p>“Demolition was then conducted after the LRA approved the PDSR.”</p> <p>C. The first sentence after the “Type 1” bullet will be revised as follows:</p> <p>“Hazardous wastes, if any, were removed and any RCRA Units were properly closed in accordance with regulatory requirements for unit closure prior to demolition.”</p>
<p>9</p>	<p>Section 1.4.3, page 1-30, last paragraph – Please recognize that although the issues with and releases from the Solar Ponds Plume reactive barrier treatment system does not result in surface water leaving the Site above water quality standards, there is still a concern with surface water on site not meeting water quality standards, which is an issue that will need to be properly addressed.</p>	<p>Assume the commenter means Section 1.4.4, which will be Section 1.2.4. The last clause will be changed to a sentence and revised as follows:</p> <p>“This may allow contaminated groundwater to impact North Walnut Creek down gradient of the barrier, such that it may not continuously meet surface water quality standards at monitoring points upstream of the A-series terminal pond.”</p> <p>A new last sentence will be added as follows:</p> <p>“However, surface water meets water quality standards at the A-series terminal pond discharge Point of Compliance.”</p>
<p>10</p>	<p>Tables need to be completed, also please recognize (Table 1.5, Note 5) that utilizing the consultative process several facilities/buildings were determined to be equipment or structures rather than buildings and were dispositioned utilizing</p>	<p>The Tables will be completed with the updated Administrative Record File references. Several Note numbers will change based on completing the entries into the Administrative Record file, and this will become note 2.</p>

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	the PRE or WRE processes rather than going through the RLCR/PDSR process.	<p>Table 1.5 note 2 will be revised as follows:</p> <p>“Some small buildings, such as guard shacks, portable shelters, bus stop enclosures, etc., were not formally typed, but met Type 1 criteria. Using the consultative process several facilities were determined to be equipment or structures and were dispositioned using the RFETS Property/Waste Release Evaluation process rather than using the RLCR/PDSR process.”</p>
11	Figure 1.6 – Please recognize that Closeout Reports were also generated for Type 1 facilities for LRA review and comment, but did not need LRA approval. Also, for some Type 1 facilities the “Decision Document” was a PDSR (that functioned as the RLCR), which was generated rather than or in lieu of an RLCR.	<p>A Closeout Report logic box will be added to the Type 1 flow chart.</p> <p>To keep the flow chart relatively simple, we believe that Section 1.2.3.3, as revised per response to CDPHE specific comment 8 above, adequately covers the review/comment/approval points.</p>
	<b>Editorial Comments</b>	
	Last paragraph in Sec 1.4.1 (p. 1-19) – Replace “regulatory” with “regulatorily”.	This will be Section 1.2.1.4. The change will be made as requested.
<b>Environmental Protection Agency (EPA) Comments</b>		
<b>General Comments</b>		
1	In several places the term “legacy waste” is used. This includes page ES-3, third paragraph; page 1-2, twice in the forth paragraph; and page 1-4, forth bullet. Because this term has no significance under RCRA or CERCLA, please delete. It is also recommended to do a global search throughout the document and delete if found.	<p>The word “legacy waste” will be deleted from the indicated text locations (global search shows not used elsewhere) and replaced with “previously generated process wastes”. The beginning of the fourth bullet sentence will be revised as follows:</p> <p>“All wastes from these cleanup and closure activities, including previously generated process wastes, ...”</p>
<b>Specific Comments</b>		
1	<b>Page 1-4, Section 1.1:</b> Because this RI/FS differs from a traditional CERCLA approach, this section should emphasize residual contamination is being evaluated after accelerated actions have been completed.	<p>This will be the last sentence of Section 1.1.2, and will be revised to read as follows:</p> <p>“... remedial decision based on levels of hazardous substances</p>

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		<p>remaining after completion of the foregoing activities and accelerated actions is now required.”</p> <p>The observation about the evaluation based on completed accelerated actions is already re-emphasized in several other appropriate places in the document</p>
2	<p><b>Table 1.4:</b> For the site disposition list, consider labeling the Data Summary and Closeout approval and submittal dates rather than referencing by Note 1 at the end of the table.</p>	<p>No change made. The approval dates are the actual approval correspondence dates. The note just explains why the final report date may be subsequent to the formal approval. The report dates are the listed date of the relevant report, and are accessible in the AR File by that date (although the AR File number is given). Thus, a report dated with a month and year only is filed using the month/01 /year convention, for example, 10/01 /05.</p>
	<p><b>Editorial Comments</b></p>	
	<p>None</p>	
<p><b>U.S. Fish and Wildlife Service (USFWS) Comments</b></p>		
<p><b>General Comments</b></p>		
1	<p>All references to the DOE/DOI Memorandum of Understanding should be removed.</p>	<p>Change will be made.</p>
<p><b>Specific Comments</b></p>		
1	<p>Section 1.3.3, page 1-8, first paragraph – Since the Rocky Flats Mineral Act negated the MOU between DOE and the Service, this discussion should be removed.</p>	<p>Please see response to USFWS General Comment 1.</p>
2	<p>Section 1.4.1, page 1-13, Number 3, last paragraph – This paragraph needs to be modified. The standards are met at the POCs, but there are still exceedances upstream of the pond system POCs.</p>	<p>Please see response to CDPHE Specific Comment 5.</p>
3	<p>Section 1.4.1, page 1-14, Number 4, last paragraph – The statement that there are no TSD facilities remaining is wrong. The Present Landfill is a disposal facility and is remaining. There are four passive water treatment facilities at the site.</p>	<p>Please see response to CDPHE Specific Comment 6, which added clarifying language to the paragraph.</p> <p>The following sentence will be added to the end (before the last</p>

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	Clarify what is meant in this paragraph; describe why they are not considered TSD facilities.	<p>sentence) of the paragraph:</p> <p>“Appropriate monitoring and operation and maintenance of the site has been identified and implemented.”</p> <p>The subsection summarizes the status of RFCA guidelines, not the RCRA permit. TSD facilities are regulated under RCRA. The only remaining regulated unit is the closed Present Landfill.</p>
	<b>Editorial Comments</b>	
	None	