Revised 12/03

CORRES. CONTROL
INCOMING LTR NO.

02232 RF04

DUE DATE

ACTION

DIST.	LTR	ENC
BERARDINI, J.H.	X	
BOGNAR, E.S.	X	
BROOKS, L.	X	
BUTLER, L.	X	
CARPENTER, M.	X	
CROCKETT, G. A.		
DECK, C. A.	X	
DEGENHART, K. R.	X	
DIETER, T. J.		
DIETERLE, S. E.	X	
FERRERA, D. W.	X	
GIACOMINI, J. J.		
LINDSAY, D. C.	X	
LONG, J. W.		
LYLE, J. L.		
MARTINEZ, L. A.	X	
NAGEL, R. E.	X	
NESTA, S.		
NORTH, K.	X	
PARKER, A. M.		
RODGERS, A. D.		
SHELTON, D. C.	X	
SPEARS, M. S.		
PIZZUTO, V.M.		
TOBIN, M.	X	
TUOR, N. R.		
WIEMELT, K.		
WILLIAMS, J. L.		
ZAHM, C.	X	
Davis, B.	X	
Rosenman	X	
COR. CONTROL	X	
ADMIN. RECORD	X	
PATS/130		

Reviewed for Addressee
Corres. Control RFP

5/21/04 DC
Date By

Ref. Ltr. #

DOE ORDER #
5400.1

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2004 MAY 26 A 8:51

CORRESPONDENCE CONTROL

Department of Energy
ROCKY FLATS PROJECT OFFICE
10808 HIGHWAY 93, UNIT A
GOLDEN, COLORADO 80403-8200

MAY 19 2004

04-DOE-00242

Mr. Steve Gunderson
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80246-1502

Dear Mr. Gunderson:

The U.S. Department of Energy, Rocky Flats Project Office (RFPO) is pleased to transmit to your agencies three copies of the Final Interim Measures/Interim Remedial Action Plan (IM/IRA) for the Present Landfill, which is being submitted for U.S. Environmental Protection Agency's (EPA) approval. The Final IM/IRA has been modified to address issues and comments that we have discussed in our recent meetings and includes:

- A two-foot thick protection layer of Rocky Flats Environmental Technology Site alluvial soil above the rock layer (burrowing animal deterrent layer);
- Technical information to support RFPO's belief that surface vegetation will become established on the two-foot soil cover above the one-foot rock layer (with fines) and 10-inch cushion layer (equivalent to about a four-foot vegetation-rooting zone);
- A revised Responsiveness Summary based on our discussions and the comments received from the EPA and the Colorado Department of Public Health and Environment (CDPHE); and.
- Modified text to incorporate specific comments from the EPA, CDPHE and the stakeholders, including the wetland mitigation plan.

Additionally, in response to the letter from the EPA dated March 11, 2004, regarding the eight specific issues to be placed in the Executive Summary, we are proposing the following resolutions:

1. *The chemical characterization and disposition of the effluent discharged from the groundwater intercept system outlets down-gradient of and in the East Landfill Pond.* The IM/IRA proposed accelerated action has been modified to route the flow, if any, from the groundwater intercept system into the seep treatment system. The accelerated action design will include additional piping and treatment system capacity to accommodate this flow.
2. *The sources of and final disposition of existing groundwater contamination down-gradient of the East Landfill Pond.* The RFPO believes that the information presented in the IM/IRA sufficiently addresses groundwater downgradient from the East Landfill Pond (see Appendix D and Section 2.6.3). The IM/IRA shows that the groundwater downgradient of the East Landfill Pond is not impacted by the Present Landfill.

Best Available Copy

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MAY 26 2004

ADMIN RECORD
BZ-A-000720

This area is not associated with any other Individual Hazardous Substance Site or Potential Area of Concern and the analytical data on the groundwater from this area do not exceed any Tier I groundwater action levels as defined in Rocky Flats Cleanup Agreement (RFCA). Therefore, no further evaluation or action is required.

3. *The potential sources of contamination up-gradient of the groundwater intercept system that may be contributing to the discharge of contaminated groundwater from the groundwater intercept system.* This concern has been addressed by the routing of the groundwater intercept system into the seep treatment system.
4. *The final disposition of the discharge pipe from the groundwater intercept system.* This concern has been addressed by routing the discharge pipe from the groundwater intercept system into the seep treatment system.
5. *Characterization and potential disposition of sediment in the East Landfill Pond.* The existing sediment data from the East Landfill Pond will be evaluated during the Data Adequacy Review and additional sampling will be performed as required by this review. Disposition of the sediments will be based on the evaluation of the sampling results in the ecological accelerated action screening process, the Comprehensive Risk Assessment and the site-wide Resource Conservation and Recovery Act (RCRA) Facility Investigation-Remedial Investigation/Corrective Measures Study-Feasibility Study as stated in the IM/IRA Executive Summary and Introduction.
6. *Ecological risks from the Present Landfill related to surface water, groundwater, surface and subsurface soil, sediment, seeps and all discharges, including a detailed review of relevant data, and discussion of the basis for proposed analytes, ecological exposure and risk assessment.* Ecological risks will be evaluated in the ecological accelerated action screening process and additional action will be taken if required. Ecological risk will be further evaluated in the Comprehensive Risk Assessment and the site wide RCRA Facility Investigation Remedial Investigation/Corrective Measures Study-Feasibility Study.
7. *Final disposition of the East Landfill Pond.* The East Landfill Pond will remain and no changes are proposed in this IM/IRA to the pond's physical configuration.
8. *Wetlands mitigation issues and strategy.* A response to your comments on the wetland mitigation plan is enclosed with this letter and modifications to the wetland mitigation plan have been included in the Final IM/IRA.

We have also enclosed responses to EPA's comments on the Responsiveness Summary.

The Department of Energy is requesting EPA's approval of the Final IM/IRA within one week of the date of this letter, based on the consultative resolution of the above issues and discussions that has already taken place among the RFCA Parties. Upon approval, copies of this Final IM/IRA will also be transmitted to the stakeholders, the Administrative Record, and the reading room.

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Please contact Bob Birk at (303) 966-5921 if you have any technical questions related to the Final IM/IRA, or contact me at (303) 966-2282.

Sincerely,

Joseph A. Legare, Director
Project Management

Enclosures: as stated

cc w/o Encl.:
F. Lockhart, OOM, RFPO
B. Birk, CPM, RFPO
S. Gunderson, CDPHE
C. Spreng, CDPHE
L. Bruskin, CDPHE
J. MacKenzie, USEPA
M. Sattelburg, USFWS
L. Butler, K-H
B. Davis, K-H

cc w/Encl.:
Administrative Record

2/2