Colorado Department of Health

Review and Comment

Subsurface Interim Measure/Interim Remedial Action/ Environmental Assessment and Decision Document Operable Unit 2
March 20, 1992

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Executive Summary - page EX-2 The second paragraph on this page states that "project success will be judged by the usefulness of the data collected with respect to final remedial design, not by the degree of cleanup achieved." While the Division agrees with the first portion of this statement, we also feel that the degree of cleanup achieved will be an important consideration in judging project success.

Section 1.1 - page 1-5· Installation and start-up of the chemical precipitation/microfiltration units for the Walnut Creek Surface Water IM/IRA have now occurred The dates for tne start-up should be incorporated into the second paragraph on page 1-5

Figure 2-7· Please revise this figure to include data from a more recent sampling event than April 4-8, 1988. This 1988 data may or may not reflect current conditions Since IM/IRA implementation decisions will be made on more recent data, the recent data should be included in this document.

Figures 2-12 through 2-17: These figures are inadequate. Updated versions of these figures need to be included in any subsequent version of this document and should include:

1) An indication next to appropriate well locations delineating which wells were dry
2) An indication next to appropriate well locations delineating which wells had "zero" or non-detect for the particular mapped contaminant
3) A reinterpretation of the contours based upon the inclusion of the above information and past information. Because this IM/IRA may be used to aid design and choice of a final remedy, these updated iso-concentration contour maps should.
    a) include either a "zero" contour or a contour at the value of the ARAR

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b) have consistent contour intervals over all areas of each map (ie. different maps can have different contour intervals, but each map should be consistent over the entire map).
c) make an effort to interpret contaminant concentrations beyond the last data point. This could include pointing the plume at the most reasonable source, closing contours when reasonable, incorporating knowledge of past sampling events to extend contours when possible, etc

Section 3.3 2: The Division disagrees with this section as is outlined in our letter included in the Executive Summary. Further discussions on this matter will be necessary before the Division can approve a final version of this document in August, 1992.

Section 4.1. The sentence that begins on the bottom of page 4-6 and continues on the top of page 4-7 appears to contain an error. Water table depression will not be applied at 10 sites

Figure 4-6. Either the text or this figure needs to make clear that this will be a new treatment system constructed specifically for this IM/IRA.

To operate this treatment facility, DOE will need to notify the Air Pollution Control Division of the Colorado Department of Health and may have to complete an APEN (Air Pollution Emission Notice).

Section 4.4.2.1: The last paragraph of this section sites that vapor treatment is discussed in Section 4.5.2.1. This is incorrect. The correct citation is Section 4.3.2.1.

Section 4 5 2 1: See above comment to Section 4 4 2.1.

Section 4.6 3: This section states that the GAC adsorption system planned for construction near building 231B is scheduled for completion in March, 1992 As it is now May, 1992, this statement should be updated to reflect the current status of this project.

Table 5-2: This schedule needs to be expanded to go beyond finalization of the Decision Document. When will implementation begin, etc.?

Appendix C:

1) For any chemical parameter that does not have a specific regulatory standard, RCRA Subpart F "background" should be TBC

2) No state standard cited in this appendix should be TBC. See comment to Section 3 3.2 above.

3) ARARs should never be listed as default detection limits The

ARAR is a regulatory standard. Whether or not treating and detecting to the ARAR is practical should be considered in the waiver process.

4) We suggest that the ARAR tables presented in the final IM/IRA Decision Documents for the OU 1 IM/IRA and the OU 2 Surface Water IM/IRA be included in this document, listed separately. This would avoid confusion from both a regulatory and implementation point of view when a decision is made on which treatment facility will treat any produced ground water

5) We suggest that DOE's new "Benchmark" tables be used as a source for the specific standard values proposed for ARAR status. There are many errors in this appendix that could have been avoided if the benchmark tables were used. These errors are itemized as follows:

Parameter	ARAR ug/l	Reference
Methylene chloride	4.7*	WQCC Statewide surface wtr std; water and fish ingestion
Chloroform	0 19*	CWA AWQC Protection of Human Health; Water & fish ingestion
1,2-DCE (tot)	5**	
Benzene	0 66	CWA AWQC Protection of Human Health; Water & fish ingestion
Antimony	14*	WQCC surface water standard; statewide domestic wtr supply
Arsenic	.0022*	CWA AWQC Protection of Human Health; Water & fish ingestion
Beryllium	0022*	CWA AWQC Protection of Human Health, Water & fish ingestion
Cadmium	1 1*	CWA AWQC Protection of aquatic life, chronic
Chromium	50	SDWA MCL
Chromium III	10**	
Chromium V	10**	
Cobalt	0 05***	WQCC statewide ground water std., agricultural
Copper	12*	CWA AWQC Protection of aquatic life, chronic
Iron	300*	SDWA MCL
Lead	3 2*	CWA AWQC Protection of aquatic life, chronic
Lithium	2500	WQCC statewide ground water std ; agricultural
Manganese	50*	SDWA MCL

Mercury	0.01*	WQCC Segment stds; protection of aquatic life; chronic
Nickel	13 4*	CWA AWQC Protection of Human Health; Water & fish ingestion
Selenium	5*	CWA AWQC Protection of aquatic life, chronic
Silver	0 12	CWA AWQC Protection of aquatic life; chronic
Thallium	0 012	WQCC surface water standard; statewide domestic wtr supply
Vanadium	100	WQCC statewide ground water std., agricultural
Zinc	50**	CWA AWQC Protection of aquatic life; chronic
Chloride	250000	SDWA MCL
Sulfate	250000	SDWA MCL
TDS	250000*	CWA AWQC Protection of Human Health, Water & fish ingestion
Fluoride	2000	WQCC surface water standard; statewide domestic wtr supply
Gross Alpha	7 pCi/l	WQCC segment specific radionuclide std
Gross Beta	5 pCi/l	WQCC segment specific radionuclide std
Pu	0.5 pCi/l	WQCC segment specific radionuclide std.
Tritium	500 pCi/l	WQCC segment specific radionuclide std.
Uranium (tot)	5 pCi/l	WQCC segment specific radionuclide std
Am	0.05 pCi/l	Was listed as ARAR in Walnut Creek IM/IRA, should be same
Cs	1000	NRC effluent std

* delineates ARAR values more stringent than those proposed in the Walnut Creek Surface Water IM/IRA. Therefore, if the produced ground water from this IM/IRA goes to the Woman Creek IM/IRA, ARARs for that IM/IRA would apply However, if the produced ground water goes to an alternate treatment facility, the ARAR values listed here would apply This concept would also apply to the correctly listed ARAR standards for PCE, TCE, and 1,1-DCE. (A comparison to the OU 1 IM/IRA was not undertaken We expect a similar situation to arise, hence our general comment 4 above)

** delineates an ARAR that is already applicable for the Walnut Creek Surface Water IM/IRA, even though there are less stringent standards that either were missed and should have been the ARAR, or have been subsequently superceeded by less stringent standards

*** delineates an ARAR for a constituent that was not included in this IM/IRA, but needs to be added.

Appendix E: The analysis presented here needs to be tied to the soil thresholds calculated in the PPCD. The project manager for this IM/IRA needs to follow the protocols outlined in the PPCD to make sure emissions from IM/IRA implementation do not exceed allowable levels