

interoffice
MEMORANDUM

To: Carl Will
From: Kirby Olson
Subject: Melrose AFR Phase 1 RFI
Date: February 4, 1999

I read through the Phase 1 RFI for the Melrose Range, and I feel it has a number of problems. The three SWMUs contain substantial burials of *unknown* materials: the investigations for the RFI have not clarified which areas contain only UXO, or UXO plus possible drums of paint and solvents, or what areas may have had liquid wastes poured out into the trenches. For safety reasons, sampling was only done in the vicinity of the trenches, so there is no way to know what may have leaked downward through the bottom of the trenches. Also, I think there may be some problems with the analysis of the samples; at one SWMU VOCs were found in every sample but dismissed as coming from the tape used to seal the jars. In addition, the investigators concluded that ground water monitoring wells were sampling water bearing layers above the aquifer, but not the aquifer from which the supply well water comes.

The human health risk assessment protocol is fine, but the sampling done does not appear adequate to determine the contaminants at the site for use in the risk assessment. No ecological risk assessment was done based on the reasoning that no site specific information on flora and fauna was available. For future reference, they can use a generic short grass prairie ecosystem for their analysis, or a generic ecosystem for grazing land.

I spoke with Stu about the Melrose Range, since I thought it was odd that they would request an NFA for sites they can't investigate or remediate. He agreed that these SWMUs are not candidates for NFA, they have to remain SWMUs. Stu is concerned that the activities at the burial sites violated some parts of RCRA, and he wanted you to review the document to establish the dates of operation for each SWMU (I tried to find these in the RFI, but they don't appear to be in the document), and the types of wastes disposed of at each site so he can talk about them with you: