



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2405

SEP 5 1991

Ref: 8HWM-FF

Frazer Lockhart
Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE: Operable Unit 1, 881 Hillside
IM/IRA.

Dear Mr. Lockhart,

On August 22, 1991, EPA met with Mr. Jim Koffer and Mr. Mark Burmeister of EG&G to discuss progress of the IM/IRA at Operable Unit 1 (OU 1), 881 Hillside. The meeting was arranged by Mr. Koffer as a result of EPA's letter of July 29, 1991, requesting additional information regarding construction, operation and maintenance of the treatment system and proposed french drain. EPA learned during the site visit that the treatment system was not yet operational. The ultra violet/hydrogen peroxide system was in place but not operational, the ion exchange system was not installed and the effluent tanks were not fabricated. To date, only the piping and motors in place have been tested.

The Phase II-A construction schedule was designed to have the treatment system in place prior to construction of the french drain in order to treat water collected in the drain as it is constructed. According to Mr. Koffer, construction of the french drain influent and effluent lines may begin the last week of August, 1991. As a result of the delayed treatment system completion, water collected during the french drain construction cannot be treated.

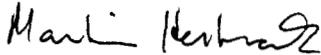
The August 5, 1991, milestone date, as specified in the Interagency Agreement (IAG) for IM/IRA testing is predicated on completing construction of the treatment system (Phase II-A) in order to effectively treat and manage water generated during construction of the interceptor system. EPA and CDH believe that the testing performed did not meet the intent of the August 5, 1991, IAG milestone. Failure to comply with the terms or conditions of the IAG as it relates to the OU 1 IM/IRA, is a violation of the IAG and is subject to stipulated penalties.

Additionally, DOE submitted a followup letter (August 21,

1991) in response to EPA's July, 29, 1991 letter. DOE requested an April, 1992, submittal date for treatment system operation, maintenance, sampling and QA/QC plans. These plans must be submitted prior to total system testing scheduled for April of 1992, in order to review and revise the plans prior to testing.

EPA and CDH would like to discuss the impact of the delays at the OU 1 IM/IRA treatment system with you and your staff. Please contact Mr. Martin Hestmark at (303) 294-1134 for EPA and Mr. Gary Baughman at (303) 331-4847 by September 9, 1991, to arrange a meeting.

Sincerely,



Martin Hestmark, Manager
Rocky Flats Project



Gary W. Baughman, Unit Leader
Hazardous Materials and
Waste Management Division

cc: Patricia Corbetta, EPA
Peter Ornstein, EPA
Noreen Matsuura, CDH
Tom Olsen, DOE
Jim Koffer, EG&G
Cindy Gee, EG&G