

# STATE OF COLORADO

## COLORADO DEPARTMENT OF HEALTH

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May 25, 1990

Roy Romer  
Governor

Thomas M. Vemon, M.D.  
Executive Director

Mr. Robert M. Nelson Jr.  
Manager  
U.S. Department of Energy  
Rocky Flats Office  
P.O. Box 928  
Golden, CO 80402-0928

Mr. Phil Warner  
Manager  
E.G.& G.-Rocky Flats, Inc.

RE: 881 Hillside Interim Remedial Action

Dear Mr. Nelson and Mr. Warner:

The Colorado Department of Health (CDH) has reviewed the documentation provided by the Rocky Flats Plant regarding construction, drilling, and site specific Health and Safety Plans for the 881 Hillside Interim Remedial Action (IRA). This letter transmits our comments on project documentation and plans, and provides conditional approval for resumption of work activities at the 881 Hillside Area.

These project documents were submitted to CDH and U.S. EPA (the Agencies) on May 16 and 22, 1990, as a result of the March 23 and 26, 1990 site inspections by the Agencies. Certain inconsistencies in construction, drilling, and monitoring procedures, including the shutdown criteria for operations at the 881 Hillside Area, were observed and identified during those inspections. DOE and E.G.& G. subsequently suspended all work at 881 Hillside on March 23, 1990.

The agencies met with DOE and E.G.& G staff on May 21, 1990 to examine and discuss the project documentation in detail, and inspect the 881 Hillside Phase I-A construction area. In addition, on May 22, 1990, DOE provided the following plans for 881 Hillside IRA, Phase I-A: (a) Quality Assurance Project Plan for drilling and construction, (b) Project Management Plan, and (c) Work Procedures-Construction and Drilling. These plans and documents satisfy a number of our concerns. Attached are remaining comments by CDH based on the submitted project documents and plans, and discussions with Rocky Flats staff.

CDH authorizes DOE and E.G.& G. to resume work activities at the 881 Hillside Area provided the following conditions are met prior to beginning any work at the site:

ADMIN RECORD

A-DU01-000287

U.S. DOE  
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1. DOE must submit a letter to the Agencies responding to our respective comments on the project documentation and plans, summarize how the documents have been revised to reflect Agency concerns, and submit the revised documents to the Agencies.
2. DOE must place the project documentation and revised plans in the public reading room at Front Range Community College.
3. DOE must brief representatives of the interested public groups on the status of the project and will consider their concerns.
4. DOE must provide the Agencies at least 48 hour notice prior to resuming work at 881 Hillside Area to allow our inspectors adequate notice to be on-site.

This project is the first of many corrective action activities at the Rocky Flats Plant. DOE must provide adequate oversight of all environmental restoration activities to ensure that effective public protection measures, worker health and safety practices, and work procedures are well established prior to work at or near any corrective action site. DOE, E.G.& G. and your respective contractors must follow these procedures. Work procedures must be revised and documented as necessary, and appropriate Agency approvals received. DOE and E.G.& G. must provide the required level of public, worker, and environmental protection, while meeting the goals of the corrective/remedial action taking place. In doing so, delays such as the one at the 881 Hillside Area can be minimized in the future.

If you have any questions regarding this matter, please contact David Waltz at (303) 331-4819.

Sincerely,



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

Attachment

cc: David Shelton, CDH-HMWMD  
Tom Looby, CDH-OHEP  
John Haggard, CDH-RFPU  
Martin Hestmark, U.S EPA (w/attachment)  
Tim Holeman, Governor's Office  
Rich Schaussburger, DOE  
Tom Greengard, E.G.& G.  
Kirk McKinley, E.G.& G.  
Rocky Flats Environmental Monitoring Council (w/attachment)  
Dennis Murano, JeffCo Health Dept.  
Boulder Co. Health Dept.  
Dave Kanuisto, Westminster  
Rocky Flats Clean-Up Commission (w/attachment)