



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2466

Ref: SHWM-FF

JUN 30 1992

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

re: OU1 Draft RFI/RI Report  
Extension Request

Dear Mr. Lockhart:

Over the past month EPA and CDH have been investigating the circumstances surrounding your May 21, 1992 request for extension on the OU 1 RFI/RI Report (92-DOE-5474). Initially we were informed that the Report, due on July 30, 1992, was in preparation, despite the unavailability of nearly all chemical analysis results from Phase III samples. We contended that submittal of a document lacking a full presentation and analysis of the complete Phase III RFI/RI data set was equivalent to not submitting a report at all; a clear failure to meet the milestone and an IAG violation subject to stipulated penalties.

In our letter of June 2, 1992, EPA and CDH deferred action on the extension request pending the results of an audit of the DOE/EG&G laboratory support program. The ongoing audit has been very informative for all parties, and identified a number of existing problems as well as a considerable amount of progress in solving them. In recent staff-level meetings, it was agreed that this new information might allow for some acceleration of the schedule set forth in your extension request. Based on these discussions and in the interest of avoiding any further unproductive effort on report preparation, EPA and CDH are hereby offering to grant an extension under the terms and conditions as outlined below. The laboratory audit will continue. Our findings will be documented and we will expect continued cooperation in working on outstanding problems with DOE/EG&G.

In light of this, we are offering to extend the milestone submittal date for the Draft RFI/RI Report to October 28, 1992. The document submitted on that date must meet all the requirements for an RFI/RI report as established in Section VII of the IAG SOW to be considered acceptable for meeting the milestone. Specifically for this OU 1 Draft RFI/RI report, this must include but not be limited to characterization of the nature and extent of contamination and the calculation of risk using the

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ADMIN RECORD

A-DU01-000361

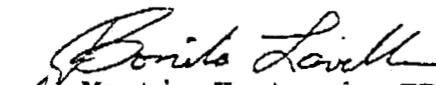
full set of Phase III data, including the supplemental surface soil sampling program completed in March 1992.

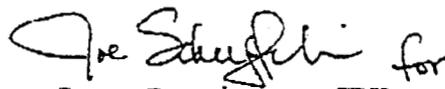
Further, in accepting this extension, DOE and EG&G agree to increase the involvement of the regulating agencies in the baseline human health risk assessment and the environmental evaluation for OU 1. We expect this involvement to occur in a series of working meetings of the Risk Assessment Technical Working Group between now and the submittal of the draft RFI/RI Report. DOE is responsible for scheduling these meetings and providing the information necessary for meaningful technical exchanges. The topics to be covered include all aspects of data evaluation, exposure assessment, and toxicity assessment, including all information being relied on for the quantitative uncertainty analysis. Risk characterization is the only aspect of the baseline risk assessment which could be left to the draft RFI/RI Report. To comply with this condition, (1) a written schedule of proposed meeting dates and topics must be submitted to EPA and CDH no later than July 6, 1992; and (2) Technical Memoranda supporting the Risk Assessment process and reflecting agreements made in the working meetings must be submitted as follows:

- \* TM 6, Exposure Scenarios (Revised): July 10, 1992
- \* TM 7, Model Descriptions: July 17, 1992
- \* TM 8, Contaminant Identification: September 9, 1992
- \* TM 9, Toxicity Parameters: September 23, 1992

We urge DOE to continue working with us in identifying the most effective ways to alleviate the sources of delays incurred to date so they can be avoided on other OUs. This extension will become effective upon receipt of your written acceptance of this offer. Subsequent milestones in the OU 1 sequence will remain unchanged unless adjusted by agreement of all parties following submittal of an adequate Draft RI Report. If you have questions or would like to discuss this offer, please contact Gary Kleeman (EPA) at 294-1071 or Joe Schieffelin (CDH) at 331-4421.

Sincerely,

  
Martin Hestmark, EPA  
Manager  
Rocky Flats Project

 for  
Gary Baughman, CDH  
Unit Leader  
Hazardous Waste Facilities

cc: Scott Grace, DOE  
Cindy Gee, EG&G  
Dennis Smith, EG&G  
Barbara Barry, RFFU