



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500

SEP 24 1991 DENVER, COLORADO 80202-2405



Ref: 8HWM-FF

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

RE: OU 1 IM/IRA

Dear Mr. Lockhart,

EPA grants your requested extension to submit information necessary to satisfy EPA's concerns regarding the IM/IRA as outlined in EPA's July 29, 1991 and April 23, 1991 letters.

In partial response to EPA's concerns, EG&G submitted to EPA during EPA's August 22, 1991 site visit, a copy of the draft Statement of Work for Operation and Maintenance of the Interim Measure/Interim Remedial Action for the 881 Hillside, Operable Unit No. 1 at Rocky Flats Plant (August 16, 1991) and Specifications and Drawings for Remedial Action, 881 Hillside, Phase IIB Construction (Collection and Discharge System) revised July, 1991. EPA reviewed these documents and provides the comments listed below which should be addressed in your October 2, 1991 submittal.

1. The System Operation (SO) start date is listed as April 6, 1992. This must be changed to April 3, 1992 as scheduled in the IAG.
2. The scheduled submittal dates for draft and final copies of the operation and maintenance manual, health and safety plan and sampling and analysis plan are not consistently listed on the schedule (pg. 15) and the OU1 Startup and O&M Schedule (Appendix 6). Additionally, according to the schedule (pg. 15), these documents will not be finalized until February 18, 1993 which is nearly one year later than the system SO start date of April 3, 1992. Finalization of these plans must be expedited in order to assure proper implementation of the IM/IRA. These documents must be submitted to EPA for review prior to system startup and finalization of the documents.

3. The schedule must include a date for submittal of necessary documents to EPA and CDH for review. The scheduled date must allow review time for the regulatory agencies.

4. The schedule (Appendix 6) indicates that testing of the ion exchange and ultraviolet-hydrogen peroxide treatment systems will be completed September 3, 1991. These tests have not been conducted to date. EPA must be notified as to when the tests will be completed and a copy of the tests results must be submitted to EPA within two weeks of receipt by EG&G and/or DOE.

5. The drain is now designed to terminate west of the existing natural gas pipeline and not to the east of the pipeline (see page 02554-7 of the Specifications and Drawings document). Final design documents must include the correction.

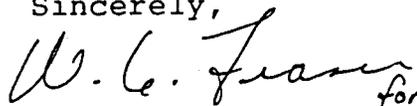
6. Only one collection sump is planned in the french drain construction and not two (see page 13000-1 of the Specifications and Drawings document). Final design documents must include the correction.

7. Final design documents must show that the French drain depth criteria (10-6 hydraulic conductivity in bedrock) are met. The revised Specifications and Drawings document indicates that the drain will penetrate two feet into bedrock. The document does not show a mechanism for meeting the 10-6 hydraulic conductivity criteria. This is not in accordance with the approved IM/IRA decision document.

8. It is recommended that a construction quality assurance/quality control plan be implemented to control, verify and document satisfactory work performance.

If you should have question regarding these comments, please contact me at 294-1134.

Sincerely,

A handwritten signature in cursive script that reads "W. C. Fraser". The signature is written in dark ink and is positioned above the typed name.

Martin Hestmark, Manager  
Rocky Flats Project

cc: Gary Baughman, CDH  
Noreen Matsuura, CDH  
Tom Olsen, DOE  
Jim Koffer, EG&G  
Terry Smith, PRC