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October 31 1994

Mr Steve Slaten
U S Department of Energy
Rocky Flats Office Bldg 116
P O Box 928
Golden Colorado 80402 0928

RE Comments Draft Final Corrective Measures Study / Feasibility Study Rocky Flats Environmental Technology Site 881 Hillside Area Operable Unit No 1 August 1994

Dear Mr Slaten

The Colorado Department of Public Health and Environment Hazardous Materials and Waste Management Division (the Division) has reviewed the above referenced document submitted by DOE and prime operating contractor EG&G The Division s comments are attached

The Division finds this draft CMS/FS fails to meet a multitude of requirements for CMS/FS reports from the IAG and RCRA guidance These failures are detailed in the Division s comments Therefore the CMS/FS if not corrected will not be approved

This document also represents a failure by the DOE in implementing the consultative process The consultative approach was heavily relied on while considering the DOE s last milestone extension request for OU 1 The Division strongly recommends that the DOE work with the Agencies to re establish the consultative approach at OU 1 so as to avoid the submittal of an unapprovable final CMS/FS

The DOE preferred alternative of institutional controls does not achieve compliance with either the CERCLA nine criteria or the RCRA Corrective Action Plan (CAP) five standards for corrective action Specifically this alternative does not attain media cleanup standards (ARARs) such as State Groundwater Standards does not control the sources of releases and does not demonstrate protectiveness of human health and the environment An alternative which includes the remediation of groundwater and meets both the RCRA/CHWA and CERCLA cleanup requirements must be selected as a preferred alternative

If you have any questions regarding these matters please call Chris Gilbreath of my staff at 692 3371 or Jeff Swanson at 692 3416

Sincerely

Joe Schieffelin
Rocky Flats IAG Unit Leader
Facilities Section
Hazardous Waste Control Program

cc Martin Hestmark EPA
Scott Grace DOE
Zeke Houke EG&G
Steve Tarlton CDPHE OE
Laura Perrault AGO

ADMIN RECORD

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