

# STATE OF COLORADO

## COLORADO DEPARTMENT OF HEALTH

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January 26, 1990

Mr. David P. Simonson  
Manager  
Rocky Flats Area Office  
U.S. Department of Energy  
P.O. Box 928  
Golden, Co. 80402-0928

Roy Romer  
Governor

Thomas M. Vernon, M.D.  
Executive Director

Re: OU2 Interim Measure/Interim Remedial Action Plan.

Dear Mr. Simonson,

The Colorado Department of Health, Division of Hazardous Materials and Waste Management (the Division) and the U.S. Environmental Protection Agency (EPA) submitted comments, under separate cover, to DOE on the December, 1989 draft proposed Interim Measure/Interim Remedial Action Plan (IRAP) for OU2. The comments were discussed with members of your staff in meetings on January 8, 16, and 18, 1990.

All parties agreed that the draft proposed plan is based on insufficient information to adequately design an effective IM/IRA for OU 2. It was also agreed that additional characterization of site conditions is necessary to properly design an effective IM/IRA. Implementation of the December, 1989 draft proposed plan and decision document is not approved by the Division or EPA. This non-approval will impact the present schedules for an IM/IRA for OU 2 as agreed to in the IAG.

In accordance with the Agreement in Principle, DOE is required to accelerate characterization and clean up at OU 2. In order to meet this task and gain the necessary information, DOE must initiate investigation of OU 2 in a phased manner. The phased characterization must accelerate investigation of areas within OU 2 expected to be the most impacted with respect to migration pathways. Investigation of alluvial and bedrock contaminant migration pathways to South Walnut Creek and Woman Creek are considered of primary importance and are to be addressed expeditiously under the IM/IRA process.

As part of the IM/IRA and RFI/RI characterization, detailed hydraulic testing including pump tests are required to determine aquifer conditions. Collected ground water must be tested for hazardous substances and a hazardous waste determination must be completed. Ground water must be treated and stored as appropriate in light of the results of the analyses and hazardous waste determination.

In the effort to accomplish the IM/IRA phased investigation in a timely manner, the Division and EPA will review and submit comments by February 14, 1990 to DOE on all sections of the December, 1989 RFI/RI workplan for OU 2. Our accelerated review is designed to expedite the necessary field work to characterize OU 2 in order to speed implementation of interim measures and interim remedial actions as required.

After receipt of our comments on the draft phase II RFI/RI workplan for OU 2, DOE agreed to incorporate our concerns into a modified phase II RFI/RI workplan which will approach the comprehensive characterization of OU 2 in a phased manner. This workplan shall address those migration pathways presenting the most probable immediate threat in a prioritized sequential manner.

The modified phase II RFI/RI workplan, must be submitted by March 7, 1990 for CDH and EPA approval and must include:

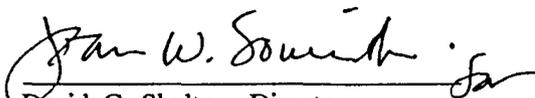
- an explanation of how the investigation will be phased to expedite IM/IRA actions at areas with the greatest potential threat to human health and the environment,
- schedules showing completion dates for field activities, analytical work, and submittal dates of individual IM/IRA plans.

DOE is required to submit draft proposed IM/IRA plans and decision documents as soon as the necessary information is obtained to design effective IM/IRAPs.

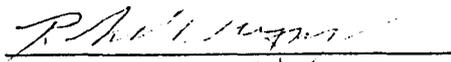
After Division and EPA review and approval of the modified phased II workplan for OU 2, including the required schedule information, the IAG schedules for OU 2 shall be modified. As the phased investigation encompasses work already agreed to be performed as scheduled in the IAG, and the Division and EPA are accelerating review of the phase II workplan, no schedule slippage for the draft phase II RFI/RI report for OU 2 should occur. This phased approach for OU 2 shall not affect any dates agreed to in the IAG for any other OUs. Regardless of the Division's and EPA's approval of this phased approach, DOE is required to complete a site characterization which adequately defines the nature and extent of contamination at OU 2. This phased approach is not an approval for DOE to complete a site characterization which does not adequately define the nature and extent of contamination at OU 2. Also, the schedules for completing any IM/IRAs need to take into consideration preparation and public review of a responsiveness summary which are associated with each IM/IRA.

A meeting to discuss our comments is scheduled for February 22, 1990 at 9:00 AM, at EPA. If you or your staff members have questions regarding these issues, please contact Patricia Corbetta at 331-4843 or Martin Hestmark at 293-1506.

Sincerely,



David C. Shelton, Director  
Hazardous Materials and  
Waste Management Division



Robert L. Duprey, Director  
Hazardous Waste Management Division

cc: Joan Sowinski, CDH  
Gary Baughman, CDH  
Fred Dowsett, CDH  
Paul Frohardt, CDH  
Lou Johnson, EPA  
Nathaniel Miullo, EPA  
Tim Holeman, Governor's Office  
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Joe Temple, RFCC

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