



Department of Energy

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FEB 28 1990

90 DOE 5068

Mr Robert C Duprey Director
Waste Management Division
U S Environmental Protection Agency Region VIII
999 18th Street, Suite 500 8 WM C
Denver Colorado 80202 2405

Dear Mr Duprey

This letter is in response to your concern over contaminated surface waters in South Walnut and Woman Creeks. Your concerns were expressed in your comments on the draft Phase II RI/FS Workplan (alluvial) for Operable Unit 2 (OU2) dated February 14 1990.

We were surprised by your comments that the volatile organic compound (VOC) release to South Walnut and Woman Creeks was not identified in the Interim Measures/Interim Remedial Action (IM/IRA) Plan and that actions were not presented by our staff that address these releases. These VOC releases are presented on page 2-65 of the IM/IRA Plan where it is further noted that these VOCs have never been detected in surface water at stations farther downstream within the property boundary. On this basis the IM/IRA Plan did not address measures for this contaminant migration pathway. You have previously called this to our attention and we have discussed this with your staff on the phone and in meetings. The results of our discussions we conclude led to your statement in your January 26 1990 letter where you stated all parties agreed that the draft proposed [IM/IRA] Plan is based on insufficient information to adequately design an effective IM/IRA for OU2. Given this situation we have agreed to develop a phased RI approach that will allow expedited collection of data for preparation and implementation of an IM/IRA plan in advance of completion of the final RI Report. This was discussed with your staff in a meeting held February 23 1990.

Furthermore in the meeting and tour of OU2 conducted February 27 1990 we agreed to revisit an IM/IRA for VOC discharges to surface water. In our next meeting scheduled for March 7 1990 we will discuss IM/IRA approaches for surface water contamination.

ADMIN RECORD

A-OU02-000374

Mr Robert C Duprey

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On another matter the enclosure describes changes to the Interagency Agreement (IAG) schedule and milestones contained within the Federal Facility Agreement and Consent Order Milestone Schedule (IAG Table 6) and the IAG Baseline Schedule dated January 8 1990 These changes will be incorporated into the Environmental Restoration IAG Baseline Schedule

If you or your staff have any questions please feel free to call me or have your staff contact Scott R Grace of my staff at (303) 966-7199

Sincerely



Robert M Nelson Jr
Manager

Enclosure

cc w/Enclosure
T T Olsen DOE RFO
M. Hestmark EPA
P Corbetta CDH

cc w/o Enclosure
T Greengard, EG&G
M. Arndt EG&G
L Johnson EPA
N Miullo EPA
J Sowinski CDH
F Dowsett, CDH
T Holeman Governor's Office
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IDENTICAL LETTER SENT TO

Mr David C Shelton, Director
Hazardous Material & Waste Management
Division
Colorado Department of Health
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