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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

APR 30 1996

Ref: 8EPR-F

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

ADMIN RECORD

re: Trench T3/T4 PAM

Dear Mr. Slaten:

EPA has reviewed your April 2, 1996 submittal (96-DOE-09490) of the revised Proposed Action Memorandum (PAM) for the Source Removal at Trenches T3 and T4, IHSSs 110 and 111.1. We have consulted with CDPHE, and find that our concerns have been addressed. We are therefore approving this document.

In doing so, we note that the PAM terminology referring to "cleanup levels" and "soil cleanup standards" is not consistent with the Action Levels Framework currently undergoing public comment. In order to avoid misunderstanding, future discussion with the public and/or correspondence regarding this action should make clear that the Subsurface Soils Action Levels and the "Put-back" levels currently being negotiated for inclusion in the Action Levels Framework will be used to establish excavation limits and determine which soils can be replaced in the trench.

The design drawings and information submitted subsequent to the PAM describing the soil stockpile containment and handling procedures satisfy the criteria listed in Subpart L of 6 CCR 1007-3, so the soil stockpile will not be subject to regulation under Subparts F or L. Debris that is determined to be hazardous and is destined for storage and/or disposal should be segregated from other materials, properly labeled, and handled accordingly.

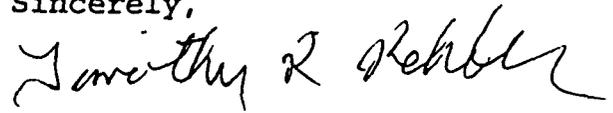
As we have indicated in recent staff discussions, we have also reviewed the Sampling and Analysis Plan (SAP) for the T3/T4 Removal. We find the SAP to be adequate to support decision-making during this action. The process performance data should be carefully monitored as the action proceeds to avoid a recurrence of the need to retreat soils encountered during the Ryan's Pit removal.

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

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If you have questions about this action, please contact Bill Fraser at 312-6258.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy R. Rehder". The signature is written in a cursive style with a long, sweeping tail.

Tim Rehder, EPA
Manager
Rocky Flats Project

cc: Susan Chaki, CDPHE
Ann Seiben, K-H
Ann Tyson, RMRS