



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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DENVER, COLORADO 80202-2466

003 AR

FEB 10 1992

Ref: 8HWM-FF

Mr. Frazer Lockhart  
U.S. Department of Energy  
Rocky Flats Office  
P.O. Box 928  
Golden, CO 80402-0928

RE: Final RFI/RI Workplan for  
Operable Unit 3

Dear Mr. Lockhart:

EPA received your letter of January 31, 1992, regarding our approval determination for the final OU 3 RFI/RI Workplan. Our position remains that the document is incomplete and inadequate. We don't believe that statements in our letter of January 15, 1992, are inconsistent. The majority of the document is adequate. We accepted without comment the soil, surface water, and groundwater programs. However, the sediment program is incomplete and inadequate.

DOE confirmed our position at the January 24, 1992, meeting by demonstrating that the proposed sampling program for the reservoirs (IHSSs 200-202) was still being developed. The number of sediment samples proposed by DOE at that meeting was significantly different from that proposed in the final workplan. Key statistical concerns of EPA about that program were still being discussed. We recently received via facsimile yet another version of the reservoir sediment program. If DOE can not describe the number of samples proposed and the locations of those samples for all IHSS's and all media, we have no choice but to conclude that the workplan is inadequate and incomplete.

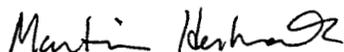
Regarding our comments on DOE's proposed air program, it appears that our concern is still not understood by DOE. As we communicated at the January 24, 1992, meeting, we are not requiring a new or greatly expanded air program for OU 3. Our comments state, "EPA expects that the addenda to the final workplan which will describe DOE's proposed air program will include consideration of the above factors (emphasis added)." However, if onsite non-radioactive contaminant sources are found, or if nonradioactive contaminants are found in OU 3, the air pathway in OU 3 will be important and is presently not quantified for these potential contaminants. DOE must look at the objectives of data collection. Within the RI/FS risk assessment process, the inhalation pathway is a potentially significant exposure pathway on OU 3. Additionally, the NCP requires an assessment of cumulative site risks. Air flowing across Rocky

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Flats Plant site does not stop at Indiana Street. It may be that in order to perform an adequate risk assessment on which to base remedial action decisions, consideration must be given to a receptor on OU 3 who is potentially exposed to airborne contaminants originating within OU 3 and also from contamination sources on site. Through our comments, we have tried to encourage DOE to look at the on site air programs to have some assurance that the data necessary for a cumulative site risk assessment is in fact being collected. We included five factors that were intended to guide DOE in this effort. We have never stated that all the required data should be collected as part of the OU 3 program. This is misrepresented in your January 31, 1992, letter. However, we believe that by not considering these five factors, DOE is risking the adequacy of the Phase I investigation for OU 3. We intended by our comments to avoid the problems being experienced on other Rocky Flats operable units stemming from a realization in the final phases of RI work that key risk assessment data is missing. DOE should be mindful of these issues when preparing the addendum to the final workplan.

We stand by our original comments and your request for extension of the revised workplan is denied. We expect a complete and adequate final RFI/RI workplan to be submitted on February 28, 1992. Further, we expect a draft Phase I RFI/RI Report for OU 3 to be submitted on July 16, 1993.

Sincerely,



Martin Hestmark, Manager  
Rocky Flats Project

cc: Robert Birk, DOE  
Erich Evered, EG&G  
Michael Guillaume, EG&G  
Gary Baughman, CDH  
Joe Schieffelin, CDH