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ACTION Kersh

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ENJAMIN, A.		
ERMAN, H.S.		
RADY, J.A.		
BANCH, D.B.		
ARNIVAL, G.J.		
OPP, R.D.		
ORDOVA, R.C.		
AVIS, J.G.		
VERED, J.E.	X	X
ERRERA, D.W.		
OODWIN, R.		
ANNI, B.J.		
EALY, T.J.		
ILBIG, J.G.		
DEKER, E.H.		
ERSH, J.M.	X	X
IRBY, W.A.		
RIEG, D.		
UESTER, A.W.		
EE, E.M.		
ARX, G.E.		
ORGAN, R.V.		
IZZUTO, V.M.		
OTTER, G.L.		
ANDLIN, N.B.		
ATTERWHITE, D.G		
CHUBERT, A.L.		
HEPLER, R. L.		
ULLIVAN, M.T.		
WANSON, E.R.		
ALLMAN, K.G.		
VILKINSON, R.B.		
VILSON, J.M.		
ANE, J.O.		
Hobbs E	X	X
Leota S	X	X
Floyd R	X	X
CORRES CONTROL	X	X
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Reviewed for Addressee Corres. Control RFP

5-17-92

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RF-46522 (Rev. 6/92)

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JUN 15 1992

ERD:BKT:6627

Environmental Evaluations (EEs) Conducted Under the RFP IAG at Industrial Area Operable Units (OUs) 8, 12, 13 and 14

J. M. Kersh, Associate General Manager
Environmental and Waste Management
EG&G Rocky Flats, Inc.

Please find attached a May 28, 1992 letter from CDH to DOE/RFO regarding Environmental Evaluations (EEs) conducted under the RFP IAG at industrial area OUs 8, 12, 13 and 14. They have requested that the ecotoxicological portion of the EE presented in the Final Phase I RFI/RI Work Plans for OU9 (it is also in the OU10 Work Plan) which will be deferred to the Phase II RFI/RI be included in the Phase I RFI/RI Work Plans for OUs 8, 12, 13 and 14. Their rationale is that the IAG schedule does not contain a provision for a Phase II RFI/RI for these OUs. However, inspection of Section VII.B., Attachment II of the IAG indicates that CDH, EPA and DOE did not necessarily expect the RFI/RIs at OUs 3, 5, 6, 8, 12, 13, 14, 15 and 16 to be completed in Phase I. Thus, whether or not a Phase II RFI/RI is scheduled in Table 6 of the IAG is a moot issue.

This action may also require that the ecotoxicological investigation discussed in the EE Work Plans presented in the Final Phase I RFI/RI Work Plans for OUs 9 and 10 will need to be conducted during the Phase I RFI/RI. The reason is that EG&G and DOE/RFO have previously agreed that if an ecotoxicological investigation is necessary in the RFP industrial area, it should be done at one time for all of the OUs in the industrial area. However, prior to receiving the May 28, 1992 letter from CDH, our plan was to leave the ecotoxicological investigation for the Phase II RFI/RI.

Since the IAG deliverable dates for the Draft Phase I RFI/RI Reports at OUs 8, 9, 10, 12, 13 and 14 all fall between February 14 and December 20, 1994, it may be possible to prepare a single technical memorandum for the industrial area OUs during Phase I. This technical memorandum would include the final habitat survey report, final biological survey report, small mammal population report and a discussion of the abiotic investigation results for the surficial soils, and possibly surface water and sediments, for all the industrial area OUs. In addition, this technical memorandum would include either a Field Sampling Plan for the ecotoxicological investigation or a justification for not conducting an ecotoxicological investigation for the RFP industrial area. In either case, the Phase I EE results would be included in the Draft Phase I RFI/RI Reports for OUs 8, 9, 10, 12, 13 and 14.

ADMIN RECORD

Thus, the options are to conduct a single Phase I ecotoxicological investigation for the RFP industrial area or to conduct multiple Phase I investigations for OUs 8, 9, 10, 12, 13 and 14. An additional option is to set up a meeting with EPA and CDH to propose that the ecotoxicological investigation at all industrial area OUs be delayed until the Phase II RFI/RI as presently described in the EE WorkPlans. This is supported by the language in Section VII.B., Attachment II of the IAG. We request that EG&G review the attached CDH letter, this memorandum and the IAG and advise DOE/RFO in writing by June 26, 1992, how planning, performance, evaluation and reporting of a possible RFP industrial area ecotoxicological investigation should be pursued in order to minimize the cost of the investigation and still allow us to meet the milestones and other requirements in the IAG.

Questions or concerns regarding this memoranda and attachment should be directed to Bruce Thatcher of my staff at extension 3532.

for Doyle R. Lockhart

James K. Hartman
Assistant Manager
for Environmental Management

Attachment

cc w/Attachment:
F. Lockhart, ERD, RFO
R. Schassburger, ERD, RFO
B. Thatcher, ERD, RFO
B. Birk, ERD, RFO
S. Grace, ERD, RFO
J. Pepe, ERD, RFO
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