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ROY ROMER
Governor

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Interim Executive Director

September 30, 1991

Mr. Frazer Lockhart
U. S. Department of Energy
Trailer 130A
P. O. Box 928
Golden, Colorado 80402

RE: COMMENTS; PHASE I RFI/RI WORK PLAN, SOLAR EVAPORATION PONDS
(OPERABLE UNIT NO. 4), U. S. DEPARTMENT OF ENERGY, ROCKY FLATS
PLANT, JUNE 1990.

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division) has reviewed the subject document submitted by DOE and prime contractor, EG&G.

Several sections of the referenced document contain basic deficiencies that must be addressed in the revised work plan. However, the ARARs, Data Quality Objectives, Remedial Alternatives, Risk Assessment and Environmental Evaluation sections of OU-3 and OU-7 provide generally acceptable formats and contents that may be utilized to guide revision of this work plan.

Although DOE has previously acknowledged the deficiencies noted above, the Division has proceeded with a review of the draft document. Our review has been undertaken to identify additional deficiencies and inadequacies that must be corrected in the final work plan. The Division's comments, and those prepared by EPA and their contractor, are attached.

Since the revised work plan will reflect major changes and may include newly proposed investigation procedures, Division staff, subject to schedules, will informally review and provide guidance as amended work plan sections are developed.

Inclusion of the French Drains into the Operable Unit was proposed by DOE at an August 9 scoping meeting. The Division agrees that it is appropriate to include the drains (and the original solar pond

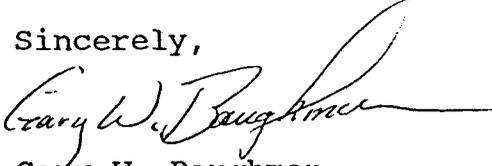
ADMIN RECORD

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site) in the operable unit for the purpose of investigation. However, the IHSS 101 boundary may not be altered since it represents a RCRA point of compliance.

If you have any questions concerning these comments, please call Harlen Ainscough of CDH at 331-4977 or Arturo Duran of EPA at 294-1080.

Sincerely,



Gary W. Baughman
Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division

Attachments

cc: Daniel S. Miller, AGO
Martin Hestmark, U. S. EPA
Arturo Duran, U. S. EPA
Brent Lewis, DOE
Paul Bunge, EG&G
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Bruce Peterman, EG&G
Barbara Barry, RFPU