



COLORADO
DEPARTMENT
OF HEALTH

ROY ROMER
Governor

PATRICIA A. NOLAN, MD, MPH
Executive Director

Hazardous Materials and Waste Management Division
4210 East 11th Avenue
Denver, Colorado 80220-3716
(303) 331-4830 / FAX (303) 331-4401

Telefax Numbers:

Main Building, Denver
(303) 322-9076

Ptarmigan Place, Denver
(303) 320-1529

First National Bank Building, Denver
(303) 355-6559

Grand Junction Office
(303) 248-7198

Pueblo Office
(719) 543-8441

May 8, 1992

Mr. Frazer Lockhart
U. S. Department of Energy
Rocky Flats Plant
Building 116
P. O. Box 928
Golden, Colorado 80402



RE: FINAL, PHASE I RFI/RI WORK PLAN, SOLAR EVAPORATION PONDS (Operable Unit No. 4), U. S. DEPARTMENT OF ENERGY, ROCKY FLATS PLANT, JANUARY, 1992.

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division) and the U. S. Environmental Protection Agency (EPA) have reviewed the subject document submitted by DOE and prime contractor, EG&G. Based on our review, the Division, as lead agency, hereby grants conditional approval to the Workplan.

Approval is being granted to allow DOE to begin plan implementation subject to the readiness of a project-specific Health & Safety Plan. A conditional status has been affixed to ensure that remaining deficiencies in the document are corrected and to ensure that a technical memorandum delivery date is established for vadose zone investigations. These issues are addressed in the Division's comments, attached.

Although comments to the Draft Final, dated November 1991, have been largely addressed, some commitments given in DOE's "Responses to Colorado Department of Health and U. S. Environmental Protection Agency Comments", dated January 1992, have not been incorporated into the workplan and warrant further attention.

Additionally, the concept of Potential Chemical-Specific Benchmarks, as proposed in DOE's letter dated March 25, 1992 has been approved. The Benchmark tables, which only contain standards for ground water and surface water, are currently being compared to State and Federal standards to verify their completeness and accuracy. Air and soil standards are also being reviewed as potential Benchmarks. Once the actual Benchmark tables are approved, the existing ARARs section must be replaced with the new tables and supporting narrative.

Also attached is EPA's letter dated March 16, 1992 recommending conditional approval of the workplan. The Division concurs with their instructions on procedures for conducting the Environmental Evaluation of OU-4.

To clarify the position of the Division as lead agency, significant changes or addenda to the workplan, in the future, should be submitted as Technical Memoranda for approval by EPA and the Division prior to being attached as amendments to the approved workplan (IAG, Statement of Work, VI.B). The appropriateness of a technical memorandum should be discussed with EPA and the Division prior to preparation.

If you have any questions concerning these comments and conclusions, please contact Harlen Ainscough of my staff at 331-4977.

Sincerely,



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

Attachments

cc: Daniel S. Miller, AGO
Martin Hestmark, EPA
Arturo Duran, EPA
Scott Surovchak, DOE
Paul Bunge, EG&G
Randy Ogg, EG&G
Bruce Peterman, EG&G
Barbara Barry, RFPD