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COLORADO DEPARTMENT OF HEALTH
Dedicated to protecting and improving the health and environment of the people of Colorado

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Roy Romer
Governor

Patricia A. Nolan, MD, MPH
Executive Director

April 7, 1994

Mr. Richard J. Schassburger
U. S. Department of Energy
Rocky Flats Plant
Building 116
P. O. Box 928
Golden, Colorado 80402-0928

RE: OU-4, IM/IRA DD, APPROVAL OF REQUEST FOR EXTENSION

Dear Mr. Schassburger,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division) has received your letter of March 23, 1994, requesting an extension of IAG milestones for the OU-4 IM/IRA Decision Document. The Division, as lead regulatory agency, hereby approves four extensions pertaining to the Phase I IM/IRA Decision Document as follows:

Draft Proposed Phase I IM/IRA DD	5/27/94
Proposed Phase I IM/IRA DD	8/06/94
Phase I IM/IRA DD Responsiveness Summary	12/14/94
Final Phase I IM/IRA DD & Responsiveness Summary	2/25/95

The Division, nevertheless, expects DOE to deliver the Final IM/IRA Title II Design document on February 10, 1995, and to begin construction activities for the IM/IRA on September 27, 1995, without impact from the 43 day extension.

DOE has informally proposed the withdrawal of the Phase II Work Plan as a component of the IM/IRA DD. The Division approves of this administrative change in the interest of avoiding potential delays in the implementation of the Phase II investigation.

Please note that DOE linked the proposed Phase II RFI/RI Work Plan schedule to the original IAG Table 6 schedule. Resolution of the OU-4 dispute previously had resulted in the incorporation of the Work Plan into and subject to the schedule of, the IM/IRA DD. Thus, DOE's request should have been based upon the schedule for the IM/IRA DD. The Division, therefore, approves an extension to May 27 and August 6, 1994, respectively, for the Draft and Final Phase II Work Plan submittals.

The revised date for submittal of the Final Phase II Work Plan is approximately three months ahead of the original IAG Table 6 milestone. We encourage DOE, subject to our approval of the final document and the availability of funding, to initiate activities at the earliest possible date. This would further ensure that a full year of ground water data can be collected, analyzed and reported on the April 16, 1996 delivery milestone of the Draft Phase II RFI/RI Report.

Regarding the potential for additional schedule impact, information recently provided to the Division suggests that leachability studies would not support an alternative which would allow contaminated soils to remain in potential contact with ground water. DOE should, therefore, develop alternative means of ensuring ground water protection that can be designed and implemented to meet the OU-4 construction start date. Any further impacts to the IM/IRA DD preparation schedule, arising from alternative design work, will be duly considered.

If you have any questions concerning the extensions or the related issues, please call Harlen Ainscough of my staff at 692-3337.

Sincerely,



Gary W. Baughman, Chief
Facilities Section
Hazardous Waste Control Program

cc: Daniel S. Miller, AGO
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