

# memorandum

DATE: DEC 26 1991

REPLY TO  
ATTN OF: ERD:BKT:11059

SUBJECT: Request for EG&amp;G to Propose a Program to Characterize RFP

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

We request that EG&G propose a program to characterize RFP (and surrounding area) soils so that each of the following goals can be achieved:

- 1) Complete the risk assessment process required by CERCLA, RCRA and the IAG. Background metals and radionuclide concentrations in soils need to be determined so that concentrations from soils in various IHSSs covered by the IAG can be compared to background. Without adequate background data for soils, DOE could potentially be forced to remediate soils where metals and/or radionuclides concentrations are not in excess of background. Background soils data should be collected such that statistical methods such as described in EPA 230/02-89-042 (Methods for Evaluating the Attainment of Cleanup Standards, Volume 1: Soils) can be applied.
- 2) Appropriate data for control areas for soils as specified by DOI's Natural Resource Damage Assessment (NRDA) regulations (43CFR Part 11) are collected. Although the formal NRDA process will not be initiated until a ROD is signed, it will be prudent to collect this data concurrently with that described in Item No. 1 above. Note that acquiring this information for the Natural Resource Trustees under CERCLA per the methods specified in 43CFR Part 11 will obtain the rebuttable presumption contained in Section 111(h) of CERCLA for DOE.
- 3) Fulfilling consultation requirements with the Soil Conservation Service (SCS) of the U.S. Department of Agriculture per the Farmland Protection Policy Act. This statute requires consideration of effects of proposed Federal actions on high-quality agricultural lands including prime farmland, unique farmland and other farmland of statewide or local importance. The SCS contact is Gary D. Finstad, District Conservationist, located in Golden, Colorado at 236-2702. As an additional note, this activity should be coordinated with EG&G's NEPA Division as this consultation normally falls under the NEPA umbrella. Finally, information regarding this statute is attached to assist your efforts.

DEC 26 1991

You should be aware that the EPA, CDH and the Natural Resource Trustees have all indicated that some off-site activities will be necessary to support this effort. Thus, you will need to be prepared to gain access to off-site areas and should include this within the program.

We request that an outline for this program be generated and submitted to DOE/RFO/ERD by January 20, 1992. A summary of existing soils data at and near the RFP should accompany the outline and should be used as a basis for defining data needs. A meeting between DOE/RFO/ERD and EG&G will be held by February 1, 1992 to discuss the existing data, the outline and the next phase of the program.

Questions or concerns regarding this request should be directed to Scott Grace (extension 7199), Brent Lewis (extension 4765) or Bruce Thatcher (extension 3532) of my staff.

  
David P. Simonson  
Assistant Manager  
for Environmental Management

Attachment

cc w/Attachment:

L. Woods, EG&G/RF  
I. Litaor, EG&G/RF  
D. Smith, EG&G/RF  
S. Nesta, EG&G/RF

cc w/o Attachment:

F. Lockhart, DOE/RFO  
R. Schassburger, DOE/RFO  
S. Grace, DOE/RFO  
B. Lewis, DOE/RFO  
B. Thatcher, DOE/RFO  
P. Powell, DOE/RFO  
R. Lindberg, EG&G/RF