



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2405

NOV 20 1990

Ref: 8HWM-FF

Mr. Gary Baughman
Colorado Department of Health
4210 E. 11th Ave.
Denver, CO 80220

NOV 23 1990

Dear Mr. ^{Gary}Baughman:

Please find enclosed, EPA and EPA contractor comments pertaining to the Present Landfill Phase I RFI/RI draft workplan. These comments are submitted to you as lead regulatory agency for your review and use in evaluating this workplan proposed by DOE.

The Work Plan submitted by DOE to CDH and EPA reflects a general misunderstanding of the RI/FS and RFI/CMS processes and the role of this particular step in the overall site remediation process. Reference is made in several areas to the purpose of an RFI/RI being to "provide justification for performing or not performing remedial action" or to support selection of a "no action" alternative. Such statements are incorrect, misleading, and prejudicial. The purposes of the RFI/RI and CMS/FS studies (which are not differentiated here, but should be) are clearly established in appropriate guidance documents, which should be carefully consulted during revisions.

As this is the document which is supposed to instruct field personnel exactly what to do, the OU 7 Field Sampling Plan (FSP) exhibits serious deficiencies. It fails to present even minimal information on field and laboratory procedures, generally addressing these issues by reference to the site-wide SOP and QAPP currently in preparation. Many missing items apparently involve site-specific questions and thus must be discussed separately in relation to this OU. This document is meant to be used in the field, not merely submitted to meet an IAG deadline and forgotten. DOE must reassess the OU 7 FSP in conjunction with the SOP and QAPP revisions pursuant to relevant EPA comments, and provide additional documentation required for the final OU 7 FSP.

A-OU07-000171

ADMIN RECORD

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If you have any questions, please contact Martin Hestmark at
(303) 294-1134 or Bill Fraser at (303) 294-~~1132~~.

Sincerely,

Lou

Louis W. Johnson, Chief
Federal Facilities Remedial Branch

Enclosures

cc: Martin Hestmark
William G. Fraser
Louis W. Johnson
Frazer Lockhart, DOE
Joe Palomba, CDH-RFPU
Tom Greengard, EG&G

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