OUTGONG LTR NO.

DOE ORDER #. 4700.1

94 RF 05671

DIST.	LTR	ENC
AMARAL, M.E.		
BENJAMIN, A.		
BERMAN, H.S.		
BRANCH, D.B.		
CARNIVAL, G.J.		
COPP, R.D.		
DAVIS, J.G.		
FERRERA, D.W.		
HANNI, B.J.		
HARMAN, L.K.		
HEALY, T.J.		
HEDAHL, T.		
HILBIG, J.G.		
KIRBY, W.A.		
KUESTER, A.W.		
MAHAFFEY, J.W.		
MANN, H.P.		
MARX, G.E.		
McDONALD, M.M.		
McKENNA, F.G.		
MONTROSE, J.K.		
MORGAN, R.V.		
POTTER, G.L.		
PIZZUTO, V.M.		
RISING, T.L.		
SANDLIN, N.B.		
SETLOCK, G.H.		
STEWART, D.L.		
STIGER, S. G.		
SULLIVAN, M.T.		
SWANSON, E.R.		
WILKINSON, R.B.		
WILLIAMS, S. (ORC)		
WILSON, J.M.		
WYANT, B.B.		
BUSBY, W.S.		
LAKE, D.Y.O.		
GLOE, K.		
CORRES.CONTROL	X	X
RECORDS CTR (2)	X	X
ERM TRACKING		
TRAFFIC		

CLASSIFICATION

UCNI		
UNCLASSIFIED	X	X
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER SIGNATURE

DOCUMENT CLASSIFICATION REVIEW WAIVER PER CLASSIFICATION OFFICE

DATE

IN REPLY TO RFP CC NO:

ACTION ITEM STATUS

☐ PARTIAL/OPEN

☐ CLOSED

LTR APPROVALS:

ORIG & TYPIST INITIALS

RF-46469 (Rev. 9/93)

CCCC 31434

EG&G ROCKY FLATS

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ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

May 18, 1994 94-RF-05671

J. L. Pepe
Environmental Restoration Division
DOE/RFFO

INCORPORATION OF OPERABLE UNIT 6 INDIVIDUAL HAZARDOUS SUBSTANCE SITES 166.1, 166.2, 166.3 AND 167.1 INTO OPERABLE UNIT 7 (02372) – TPO-021-94

The above referenced letter from the Department of Energy (DOE) requested approval from the regulatory agencies for the above referenced transfer. I feel that there may have been some communication problems regarding this issue and the proposed transfer may not be the most cost effective means to disposition these sites. I have several concerns regarding this and a more simplified strategy.

First, incorporation of these Individual Hazardous Substance Sites (IHSSs) impact current costs and schedules for the following reasons.

- Additional costs and time would be required to conduct risk assessments on the sites. This would include transfer of data from Operable Unit (OU) 6 to OU 7 personnel, calculation of contaminants of concern, data aggregation and risk assessment. This would also include modification of OU specific subcontracts and change control actions since scope would be transferred between Activity Data Sheets (ADSs).

- Development of additional documentation to report the above listed results. These results were to be evaluated and presented in the OU 6 RCRA [Resource Conservation and Recovery Act] Facilities Investigation/Remedial Investigation (RFI/RI) report. There is no equivalent document scheduled for OU 7 since the Phase I data has already been evaluated and is presented in existing documentation.

I would recommend that the IHSSs not be transferred. I would propose that we plan to coordinate closure of those sites with closure of the landfill, if applicable, using the Corrective Action Management Unit (CAMU) concept. This would be dependent upon the evaluation of nature and extent of contamination and assessment of risk. This would allow the OU 6 team to complete risk characterization including identification of contaminants of concern. In addition, the results could be included in the OU 6 RFI/RI Report as currently planned rather than expend resources to create an additional document since the OU 7 team has already proposed contaminants of concern.

Current project schedules for OU 6 and OU 7 easily allow for coordination of this effort and text could be added to the OU 7 Interim Measure/Interim Remedial Action to allow for incorporation of these sites into the CAMU concept. If risk numbers indicate that no further action is necessary, OU 6 can develop that documentation since this is currently not in the scope for OU 7.

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

I believe this methodology is more efficient and cost effective while obtaining the intended objective. Please call me to arrange a discussion regarding this or if you have any other questions.

Tim P. O'Rourke
Operable Unit 7 Project Manager
Remediation Project Management
EG&G Rocky Flats, Inc.

tjr

Original and 1 cc – J. L. Pepe

Attachments:
As Stated