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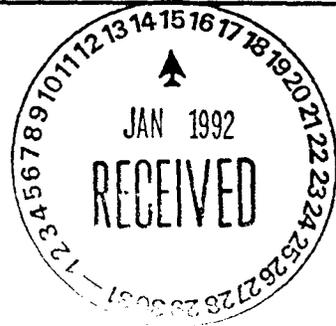
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ROY ROMER
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Interim Executive Director

January 6, 1992

Mr. Frazer Lockhart
U. S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928



RE: Review and Comment, Final Phase I RFI/RI Workplan for OU 9,
Original Process Waste Lines, November, 1991

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document prepared by DOE and it's prime operating contractor EG&G. Comments from the Division, as well as from EPA, are attached.

The Division is willing to grant approval to this document, providing the following conditions are met:

- 1) A thorough evaluation is completed of the entire OU 9 area regarding equipment access. If access is found to be limited, the practicability of implementing the field sampling plan as currently written needs to be reviewed.
- 2) A review is completed of existing hydraulic conductivities that have been determined for wells in the vicinity of the OPWL and how these hydraulic conductivity values may impact the conceptual model and, therefore, the field sampling plan.
- 3) A review is completed of the risk assessment pathway analysis and flowchart presented in Section 2 of this workplan as delineated by the attached comments. In addition, a review of the ability of the risk assessment conceptual model to guide the evaluation of the risk impacts of each pathway, both in Phase I and Phase II of the RFI/RI investigation, is needed.
- 4) The FSP is revised to reflect that test pit construction does not damage the in-situ condition of the OPWL pipelines

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and that pressure testing the pipelines between test pits will be used when appropriate.

5) The Workplan is revised to incorporate conditional items 1 through 8 as listed in the attached EPA cover letter.

6) The Workplan is revised to incorporate the attached CDH and EPA comments. Revised pages of the workplan, figures, etc., can be resubmitted as appropriate.

If these conditions are not met by February 10, 1992, approval of the workplan is negated. At that point, DOE will be in violation of the IAG and may be liable for stipulated penalties that will accrue from January 6, 1992.

If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 331-4421.

Sincerely,



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

cc: Martin Hestmark, EPA
Daniel S. Miller, AGO
Bruce Thatcher, DOE
Paul Bunge, EG&G
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