

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

May 26, 1992³

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

RE: Industrialized Area IM/IRA

Dear Mr. Schassburger,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), and the Environmental Protection Agency (EPA) hereby request that DOE develop and implement an Interim Measure/Interim Remedial Action (IM/IRA) for the Industrialized Area (IA) of the Rocky Flats Plant pursuant to Paragraph 150 of the IAG. This IM/IRA must accomplish the following:

- 1) Develop and implement a monitoring network for surface water, ground water, and air around the periphery of the IA, capable of detecting contaminant release or migration, which would operate until such time as the entire IA was remediated and buildings decontaminated and decommissioned, and
- 2) Develop and implement administrative and financial capability allowing DOE to respond, in a timely manner, to any contaminant release or migration from the IA before remediation and building decontamination and decommissioning is complete.

The agencies believe this IM/IRA is necessary because, as activities within the IA change to accommodate decontamination and decommissioning, the risk of contaminant release or migration may increase due to non-routine activities. This necessitates ongoing comprehensive monitoring of the IA.

The agencies request that a scoping meeting for this IM/IRA occur no later than June 18, 1993. In addition, we believe that a draft IM/IRA decision document should be submitted to the agencies for

ADMIN RECORD

A-0009-000180

review by December 31, 1993. Therefore, we request that your staff evaluate this request and notify us of the time and location for the first scoping meeting concerning this IM/IRA.

If you have any questions regarding these matters, please call Joe Schieffelin (CDH) at 692-3356 or Bill Fraser (EPA) at 234-1081.

Sincerely,



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



Martin Hestmark, Manager
Rocky Flats Team
Environmental Protection
Agency

cc: Daniel S. Miller, AGO
~~James~~ K. Hartman, DOE
Wanda Busby, EG&G
Jackie Berardini, CDH-OE

Attachment 2

INTEGRATED OPERABLE UNITS IHSSs

11/24/93

OU #	IHSS #	DIMENSION	SIZE CRIT	BLDG %	BLDG #	ACCESS PHYSICAL FEATURES %	AFFECTED BY UTILITIES	PA IN/OUT	MEET SELECT CRITERIA	SCOPE/PROPOSED ACTIONS			
										~NW	DRILLING	BH	MISC
8	123	1400x25	N	0	0	C F OHE			1 Y		18	9	
8	135	100X60	Y	0	0	75%PC PA T Schedule for tank upgrades FY95			1 Y		4	2	
8	139	240x25	Y	0	0	40%PA T OHE EQ	N		1 Y				
8	150	420x20	Y	0	0	100%PA OHE OHP			1 Y				
8	151	60x45	Y	0	0	100%PC C P EQ Diesel tank sched upgrade FY95			1 Y		12	6	
8	163	150x125	N	10	1771G	50%PA OHE 50% OUF FENCE RD 207 C	N		1 Y		5	2	
8	163	260x40	Y	15	1771A	10%PA OHE EQ	N		1 Y		1		
8	173	125x40	N	60	NI only 991	25%PA EQ DRUMS SCRAP PALETTES 75%PC	N		1 Y		5	2	
8	184	50x75	Y	0	NI only	100%PA EQ DRUMS STORM DRAIN	N		1 Y		5	2	
8	139	1N	Y	10		100%PA 5%PC T EQ OHE	N		1 Y		5	2	
8	139	1S	Y	0		40%PA T OHE EQ	N		1 Y				
8	118	125X40	Y	5	701	50%PA OHP C	Y		1 Y				
8	118	230X20	N	0		100%PA OHE T	Y		1 N		4	2	
8	137	140x100	N	40	712 713	80%OHE P EQ Blow Down			1 N		4	2	
8	138	50x50	Y	0		30%P OHE	Y		1 N		10	5	
8	150	160x360	N	10	771	100%PA 5%OHE EQ			1 N		9	5	
8	150	2680X90	N	60	771 776	20%PA OHE OHP EQ F			1 N		13	6	
8	150	3150x30	N	0	1771 Tunnel	SLOPING P PC Enclosed Tunnel			1 N		12	6	
8	150	6125x180	N	25	705 706	30%P OHE	Y		1 N		12	6	
8	150	7370X130	N	40	776 778	50%PC 50%PA OHE C EQ(V) T Limited access			1 N		12	6	
8	150	8	N	0		as part of IHSS 150 6			1 N		13	5	
8	172	4350x60	N	0	adj 771	100%PA WETLANDS			1 N				
8	188	110x65	Y	0		100%PA		1 part	1 N				
8	139	1N Tank	Y	0		F 30%T PCB CONTAMINATED WETLAND	N		1 N				
8	144N	25x70	Y	0		P OHP C EQ	N		1 N		14	7	
8	144S	15x170	N	0		100%PA OHP	N		1 N		14	7	
8	150	5	N	0		deletion same as IHSS 123 2 in OUS			1 N		14	7	

PA = Asphalt PC = Concrete OHE = Overhead Electrical OHP = Overhead Pipe P = Pipe C = Columns T = Tanks EQ = Other Equip WP = Well points F = Fence RR = Railroad Tracks NI = Non Intrusive O = Out Protected Area
 1 = In Protected Area 2 = In Exclusion Area
 Page 1

INTEGRATED OPERABLE UNITS IHSS

OU #	IHSS #	DIMENSION	SIZE CRIT	BLDG #	BLDG #	ACCESS PHYSICAL FEATURES %	AFFECTED BY UTILITIES	PA IN/OUT	MEET SELECT CRITERIA	SCOPE/PROPOSED ACTIONS		
										MW	BH	MISC
9122		2x3000gal	60		441	Inspect residue and soil samples			OY			14
9123	2	50x40	0	559	Accessible				1Y			14
9124	1	1x3000gal	0	774	Inspect residue and soil samples				1Y			42
9124	2	2x14000gal		774	Inspect residue and soil samples				Y			
9124	3	2x14000gal		774	Inspect residue and soil samples				Y			
9125		1x14000gal	0	774	same as IHSS 124.1				1Y			14
9126		2x2500gal	100	771	Inspect residue and soil samples				1Y			28
9127		60	0	774	Accessible for test pits				1Y			14
9132		2x2250gal	100	776	Inspect residue and soil samples				1Y			14
9132		2x450gal		776	Inspect residue and soil samples				Y			
9146		2x3000gal	100	774	Inspect residue samples				1Y			84
9146		4x600gal		774	Inspect residue samples				Y			
9147	1	40x190		0	Portal 1 Accessible parking lot				OY			14
9149		650		0	Pond 207A Accessible close to Solar Ponds				1Y			14
9159		30x150	0	559					1Y			14
9159		1xunk gal	100	774	Inspect residue samples				1Y			
9121	P01	180	33	123	Outside portion accessible for test pits				OY			
9121	P03	162	2	441	Accessible for test pits				OY			
9121	P04	173	0	444	Accessible for test pits				OY			
9121	P05	156	90	444	Outside portion accessible for test pits				OY			
9121	P06	1300	46	881	Outside portion accessible for test pits				OY			
9121	P07	440	81	881	Test pit access questionable				OY			
9121	P09	504	19	883	Accessible for test pits				OY			
9121	P10	1190	62	865	Outside portion accessible for test pits				OY			
9121	P11	175		0	Portal 1 Accessible for test pits				OY			
9121	P12	510		0	Portal 1 Accessible fence area special case				1Y			
9121	P13	500		0	Portal 1 Accessible fence area special case				1Y			
9121	P14	648	75	707	Outside portion accessible for test pits				1Y			
9121	P15	785	0	707	Accessible tight area				1Y			
9121	P16	170	35	559	Accessible for test pits				1Y			
9121	P19	603	76	777	Outside portion tight but accessible				1Y			
9121	P21	386	20	771	Accessible				1Y			
9121	P23	410	0	771	Accessible				1Y			
9121	P24	306	4	771	Accessible				1Y			
9121	P25	562	12	774	Accessible				1Y			
9121	P26	2750	49	Pond 207A					1Y			
9121	P27	186	33	774	Accessible				1Y			
9121	P28	128	0	774	Accessible				1Y			
9121	P29	197	34	774	Accessible				1Y			

INTEGRATED OPERABLE UNITS IHSSs

OU #	IHSS #	DIMENSION	SIZE CRIT	BLDG %	BLDG #	ACCESS PHYSICAL FEATURES %	AFFECTED BY UTILITIES	PA INPUT	MEET SELECT CRITERIA	SCOPE/PROPOSED ACTIONS		
										MW	BH	BAT
9 121 P34		198		100	774				1Y			
9 121 P35		142		100	Pond 207C				1Y			
9 121 P36		599		14	Pond 207A				1Y			
9 121 P37		1449		7	779	Accessible for test pits			1Y			
9 121 P38		800		14	Pond 207A				1Y			
9 121 P39		1817		4	990	Accessible has break area E of 782			1Y			
9 121 P40		232		0	895	Accessible for test pits			1Y			
9 121 P41		1537		68	779				1Y			
9 121 P42		213		12	779				1Y			
9 121 P43		100		0	777				1Y			
9 121 P44		135		0	777				1Y			
9 121 P45		130		0	778				1Y			
9 121 P46		142		0	779				1Y			
9 121 P47		135		0	Pond 207A				1Y			
9 121 P48		193		66	Pond 207C				1Y			
9 121 P49		85		0	Pond 207C	Accessible close to Solar Ponds			1Y			
9 121 P50		105		48	Pond 207B	Accessible close to Solar Ponds			1Y			
9 121 P56		170		0	774	Accessible			1Y			
9 121 P57		112		0	123	Accessible			0Y			
9 121 T01		1x800gal		0	122	Soil sample			0Y			
9 121 T03		2x3000gal		50	441	Inspect residue and soil sample			0Y			
9 121 T04		3x60gal		100	444	Inspect residue samples			0Y			
9 121 T06		2x500gal		100	444	Inspect residue samples			0Y			
9 121 T08		2x2500gal		100	771	Inspect residue and soil sample			1Y			
9 121 T09		2x2250gal		100	777	Inspect residue and soil sample			1Y			
9 121 T10		2x4500gal		100	777	Inspect residue and soil sample			1Y			
9 121 T13		1x600gal		100	774	Inspect residue samples			1Y			
9 121 T14		1x3000gal		0	774	Inspect residue and soil sample			1Y			
9 121 T16		2x14000gal		100	774	Inspect residue and soil sample			1Y			
9 121 T18		1xUNKgal		100	776	Inspect residue samples			1Y			
9 121 T19		2x1000gal		100	778	Inspect			1Y			
9 121 T20		2x800gal		100	779	Inspect			1Y			
9 121 T21		1x250gal		100	886	Inspect residue and soil sample			0Y			
9 121 T22		2x250gal		100	886	Inspect residue and soil sample			0Y			
9 121 T23		1x600gal		100	865	Inspect			0Y			
9 121 T27		1x600gal		0	886	Soil sample			0Y			
9 121 T28		2x1000gal		100	889	Inspect residue samples			0Y			
9 121 T29		1x20000gal		0	779	Inspect residue and soil sample			1Y			
9 121 T36		1x500gal		100	771	Inspect residue samples			1Y			

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INTEGRATED OPERABLE UNITS IHSSs

OU #	IHSS #	DIMENSION	SIZE CRIT	BLDG %	BLDG #s	ACCESS PHYSICAL FEATURES %	AFFECTED BY UTILITIES	PA IN/OUT	MEET SELECT CRITERIA	SCOPE/PROPOSED ACTIONS		
										MW	BH	BAT
9121 T37	1x500gal	100	771	Inspect residue samples				1 Y				
9121 T38	1x1000gal	100	779	Inspect residue samples				1 Y				
9121 P02	120	0	881					0 Y				
9121 P08	452	100	123	Inaccessible under 123				0 N				
9121 P17	135	22	881	Questionable close to 881		Y		0 N				
9121 P18	1130	88	559	Questionable close to 559				1 N				
9121 P20	150	89	707	Questionable close to 559				1 N				
9121 P22	499	5	774	Questionable close to 777 778				1 N				
9121 P30	1205	93	771	Inaccessible 771 UBC				1 N				
9121 P31	667	90	777	Inaccessible under 777				1 N				
9121 P32	167	100	774	Inaccessible under 771				1 N				
9121 P33	907	87	777					1 N				
9121 P51	140	100	774	Inaccessible under 771				1 N				
9121 P52	170	100	778	Inaccessible under 778				1 N				
9121 P53	280	100	443	Inaccessible under 443				0 N				
9121 P54	78	17	881	Questionable close to 881				0 N				
9121 P55	138	0	881	Inaccessible under 881				0 N				
9121 T02	158	53	881	Questionable close to 881				0 N				
9121 T05	1x3000gal	100	441	Inaccessible under 441				0 N				
9121 T07	2x4000gal	100	444	Active				0 N				
9121 T11	2x2000gal	100	559	Active				0 N				
9121 T12	NA	100	707	Active				1 N				
9121 T15	2x7500gal	100	774	Under 774			NA	1 N				
9121 T17	4x6000gal	100	774	Under 774				1 N				
9121 T24	7x2700gal	100	887	Active				0 N				
9121 T25	2x750gal	100	883	Active				0 N				
9121 T26	3x750gal	100	883	Active				0 N				
9121 T30	1x23000gal	100	707	Active				1 N				
9121 T31	NA	NA		Invalid location			NA	1 N				
9121 T32	1x13200gal	100	887	Active			NA	1 N				
9121 T33	NA	NA		Invalid location			NA	0 N				
9121 T34	NA	NA		Invalid location			NA	1 N				
9121 T35	NA	NA		Invalid location			NA	1 N				
9121 T39	4x250gal	100	881	Already removed and cleaned			NA	1 N				
9 San Sewer	vast	varies					both	1 N				
9 UBC 123	150x180	100						0				
9 UBC 442	130x80	100						0				
9 UBC 444	420x300	100						0				

INTEGRATED OPERABLE UNITS IHSSs

11/24/93

OU #	IHSS #	DIMENSION	SIZE CRIT. %	BLDG %	BLDG #	ACCESS PHYSICAL FEATURES %	AFFECTED BY UTILITIES	PA IN/OUT	MEET SELECT CRITERIA	SCOPE/PROPOSED ACTIONS			
										MW	BH	BAT	MISC
9UBC 559		230x160	100						1				
9UBC 707		300x450	100						1				
9UBC 771		360x300	100						1				
9UBC 774		150x140	100						1				
9UBC 776		250x360	100						1				
9UBC 779		210x220	100						1				
9UBC 881		240x400	100						0				
9UBC 883		210x250	100						0				
9UBC 887		20x60	100						0				

INTEGRATED OPERABLE UNITS IHSSs

11/24/93

OU #	IHSS #	DIMENSION	SIZE CRIT. %	BLDG %	BLDG #	BLDG # s	ACCESS PHYSICAL FEATURES %	AFFECTED BY UTILITIES	PA IN/OUT	MEET SELECT CRITERIA	SCOPE/PROPOSED ACTIONS			
											MW	BH	BAT	MISC
10	129	55X20	Y	0	0		P OHP OHE EQ			OY			5	2
10	170	1000X250	N	0	0					OY			4	3
10	175	40X40	Y	0	0					1Y			2	2
10	177	50X20	Y	100	100	885	OHE 80%PA			OY			2	2
10	181	30X20	Y	0	0					OY			2	1
10	182	40X45	Y	20	20	453	100%PA			2Y			2	1
10	208	20X25	Y	0	0		40%PA 30%PC			2Y			4	1
10	210	30X30	Y	0	0		NO PICTURE			1Y			4	1
10	214	400X500	N	0	0		100%PA OHE OHP F EQ			1Y			20	3
10	174A	10X10	Y	0	0					OY			2	1
10	174B	5X5	Y	0	0					OY			2	1
10	176	300X400	N	6	6	964				1IN			5	3
10	205	35X30	Y	50	50	460	180%PC 20%PA EQ T PARTLY IN BLDG			2IN			1	1
10	206	35X10	Y	0	0		OHE EQ F			1IN			2	1
10	207	10X10	Y	0	0		100%PC			2IN			2	1
10	213	1450X300	N	0	0		100%PA OHE EQ			OIN			20	3

INTEGRATED OPERABLE UNITS IHSSs

OU #	IHSS #	DIMENSION	SIZE CRIT %	BLDG %	BLDG #/s	ACCESS PHYSICAL FEATURES %	AFFECTED BY UTILITIES	PA IN/OUT	MEET SELECT CRITERIA	SCOPE/PROPOSED ACTIONS			
										MW	BH	BAT	MISC
12	116 1	1100X50	Y	20	448	40%PA OHP EQ OHE	N	2	Y	1	2		
12	116 2	40X30	Y	0		100%PA OHP OHE	N	2	Y	1	2		
12	120 1	60X90	Y	30	568	10%PC OHE OHP EQ C Stored materials	N	654 area	Y		2		WP = 3
12	120 2	45X150	N	5	664	80%PA 10%PC F RR	N	2 part	Y		2		WP = 3
12	136 1	150X75	Y	25	480	100%PA Underground Electric Manhole	N	2 part	Y		2		
12	136 2	35X185	N	0		F RR	N	2 part	Y		2		
12	188	80X190	Y	0	NI only	10%T EQ RR 3%PC OHE OHP Limited Scope	N	2 part	N				
12	147 2	175X130	N	15	NI only	F EQ OHE	N		N				
12	157 2	750X600	N	65	444 447	OHE OHP EQ C	N	2	N		8		WP = 10
12	187	165X25	Y	25	NI only 443	50%PA F OHP OHE T EQ	N	2 part	N				
12	147 1	Transferred to Operable Unit 9											

INTEGRATED OPERABLE UNITS IHSSs

OU #	IHSS #	DIMENSION	SIZE CRIT	BLDG %	BLDG #/s	ACCESS PHYSICAL FEATURES %	AFFECTED BY UTILITIES	PA IN/OUT	MEET SELECT CRITERIA	SCOPE/PROPOSED ACTIONS			
										MW	BH	BAT	MISC
13	117 2	160X510	N	0	0	100%PA F EQ		O/Y	O/Y	1		3	
13	117 3	170X270	N	0	0	30%PC 70%PA F 15%T		O/Y	O/Y			3	
13	128	90X75	Y	10	335	25%PA		O/Y	O/Y	2		3	
13	134	100X190	N	0	0	80%PA		O/Y	O/Y	2		6	
13	152	180X300	N	0	0	30%T F		O/Y	O/Y	2		3	
13	171	210X60	N	15	335	10%EQ		O/Y	O/Y	1		3	
13	117 1	320X300	N	20	1223	548 10%PA OHE F P		O/N	O/N	1		3	
13	148	100X190	N	90	123	100%PA		O/N	O/N	2		3	
13	157 1	200X520	N	0	0	PA PC OHE OHP F Central Avenue Ditch		O/N	O/N	2		3	
13	158	200X275	N	30	551	100%PA OHE F		O/N	O/N	2		3	
13	186	40X650	N	5	1552	549 OHE EQ		O/N	O/N	2		3	
13	169	NO FURTHER ACTION						O	O				
13	190	NO FURTHER ACTION						O	O				
13	191	NO FURTHER ACTION						O	O				

INTEGRATED OPERABLE UNITS IHSSs

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										MW	BH	BAT	MISC
14	156 1	370X180	N	0	0	100%PA OHP F			O/Y				
14	160	280X375	N	5	668	100%PA P			O/Y		3		
14	164 1	40X75	Y	0		100%PA OHE OHP			O/Y		40		
14	131	10X50	Y	20	776	100%PA OHP T EQ			1/N		19		
14	161	150X180	N	50	664	90%PA			664 Area N		2		
14	162	50X1400	N	20	771	776	90%PA OHP OHE		1 part N				
14	164 2	250X260	N	40	886	15%PC EQ			O/N		40		
14	164 3	250X100	N	15	884	90%PC OHP OHE			O/N		40		

ATTACHMENT 3
INDUSTRIAL AREA OU INTEGRATION
IHSS EVALUATION

OUs 8,9,10,12,13,14

PURPOSE

The purpose of this effort is to evaluate the Industrial Area Operable Units (IA OUs) to determine a basis for scheduling of intrusive work activities (consistent with the Phase I RFI/RI Work Plans) following implementation of the non-intrusive field work in FY93 and FY94. In the most recent Five Year Plan intrusive field work of all the IA OUs were categorically linked to completion of transition and D&D efforts. The result of this assumption was that a majority of the intrusive work was pushed into the outyears by 5 years and as much as 22 years. Certainly, there are IHSSs that need to be deferred to completion of D&D, especially large IHSSs adjacent to buildings. However, there are several IHSSs that should not be linked to D&D efforts and based on historical knowledge these IHSSs would most likely require minimal intrusive work and may be closed. The main driver for this effort is to identify these select IHSSs for intrusive work that can be performed independent of D&D efforts and transition and move this work into the FY94 budgeting effort.

Also, funding levels in FY93 were inadequate to maintain compliance with the IAG milestones, this IHSS evaluation effort will provide the scope and schedule to support upcoming extension requests to the agencies for the IA OUs. Several factors that are considered for the IHSS evaluation are and part of the approach for scheduling and implementation of intrusive work for the IA OUs are

- Current Funding and outyear funding levels
- Programmatic issues
- Transition and D&D interaction
- Physical access restrictions e.g. utilities
- Proposed intrusive activities
- Location and access
- OU Work Plan compliance

EG&G is evaluating each IA OU on an IHSS per IHSS basis. The information collected is being compared to a set of selection criteria used to provide the basis for estimating what work can be performed following the non-intrusive field work and what work should be deferred. The scope of each IA OU IHSS is limited to the anticipated initial stages of intrusive field work efforts used for producing the budget information for the Five Year Plan. The individual Phase I RFI/RI Work Plans also detail some intrusive work, but most of the intrusive efforts are to follow the results of the non-intrusive field work in FY93.

PROCESS

The IHSS evaluation is to serve as a decision tool for proposed intrusive work for the IA OUs. The main question that needs to be answered is which IHSSs should be linked to D&D effort and which IHSSs could be worked on immediately following the non-intrusive effort. This effort is designed to meet three goals and to be based on as much factual information as possible. These goals are

- 1 Demonstrate to EPA and CDH that investigation of the IA OUs is dependant on D&D

and transition efforts

- 2 Provide definitive guidance for outyear planning efforts and thus reduce last minute planning decisions that don't make sense
- 3 Provide a basis for requesting extensions for IAG milestones for the IA OUs

Each IA OU has been evaluated on an IHSSs per IHSSs basis. The results of this effort are presented on the attached spreadsheets. The purpose of the information in the spreadsheet is to provide a basis for meeting selection criteria for evaluating each IHSSs and then making a decision to move intrusive work into FY94 or to have the work linked to D&D efforts. The IHSS data presented is based on information from the Phase I RFI/RI Work Plans, historical records, site photos, and field inspections. The idea is to provide the best information regarding the physical layout of the IHSS, location, access restrictions, paving, utility locations and security requirements. The information presented is a result of RPM's ongoing effort to date.

IHSS Selection Criteria

SIZE

The approximate dimensions of each IA OU IHSS are listed in the attached spreadsheet. The dimensions are given and used for the basis of selecting IHSSs on size alone. The overall assumption that applies to this selection criteria is that smaller IHSSs inherently require less intrusive field work and are more likely to be characterized earlier in the investigative process. Also, there is a higher probability that smaller IHSSs will meet closure criteria from implementation of the first stage of intrusive field work. Thus, further requirements for investigation or remediation may be met and the IHSS closed. Size selection criteria only relates to the layout and relative size of the IHSS. No consideration is given to the type of contaminants, location of utilities etc. Overall, large IHSSs would not meet the size selection criteria, thus the relative weight for selecting the IHSS for early characterization would be reduced. However, there still may be instances where larger IHSSs would be selected for early investigation. The rationale for selection of large IHSSs would be explained on a case-by-case basis. The specific criteria that an IHSS would be selected is as follows:

- The IHSS dimension must be less than 100 ft by 100 ft. This dimension is used to describe relative area coverages. For example an IHSS measuring 150 ft by 20 ft would meet the size selection criteria because the area is less than the given coverage dimension.

Note IHSS dimensions listed in the spreadsheet are approximate. A majority of the IHSSs vary in shape and are not simply described as rectangular forms. The dimensions in the spreadsheet are listed as rectangular dimensions to provide total coverage of the IHSS and to simplify the IHSS selection process.

If the IHSS meets the above selection criteria, the IHSS is chosen for implementation of intrusive field activities. The size criteria accounts for roughly 25 percent of the total weight of the overall selection of the IHSS.

ACCESS

These criteria are mainly related to selecting an IHSS based on future D&D and transition efforts. The criteria and their associated weighting towards overall selection of the IHSS are:

- Surface Coverage (10%) - the type of IHSS surface material related to paving type etc.

asphalt, concrete, natural or artificial fill materials, determined from aerial photos and field inspections

- Utility Locations (10%) - concerned mainly with overhead types of utilities. Underground utilities are likely to be a problem anywhere in the industrial area. Specific utility maps are being evaluated but were not part of this selection criteria.
- Stored Material (15%) - consists of materials stored on IHSSs which can include equipment, hazardous and non-hazardous waste material, stocked materials, etc. Usually items stored on IHSSs can be moved or worked around.

All of the access criteria were evaluated on an IHSS per IHSS basis from historical data, work plan information and onsite field inspections. For this effort RPM perform field inspections on each IHSS of the IA OUs. The field inspections are the basis for estimating the access coverages and selection of the IHSS for intrusive activities. The main goal of the access criteria is to evaluate relative ease for performance of intrusive field work. For example if any IHSS is paved with concrete and utilities are identified in the IHSS then selection of the IHSS for early intrusive field work may not be possible, then investigation of the IHSS would be deferred until completion of D&D activities.

LOCATION

Two selection criteria are used for evaluation of IHSS location. The criteria and overall weighted percentages are as follows:

- Security Areas (15%) - is the IHSS located in or out of the Protected Area, Exclusion Zone or other security restricted areas.
- Building Coverage (25%) - some IHSS are adjacent to or are covered by buildings. This is a major criteria for relating IHSSs to D&D and transition activities. In the spreadsheet the IHSS building coverages are given in a percentage and then the appropriate building(s) are listed. If a building is not listed but a building percentage covered is listed, then the criteria is applied to other physical barriers e.g. a tank located in the IHSS, etc.

IHSS SELECTION

When an IHSS has been selected for intrusive field activities then the column in the spreadsheet "Meet Selection Criteria" is checked "yes". The spreadsheet was sorted on the "Meet Selection Criteria" column and the IHSSs are listed on an OU by OU basis are the ones selected for early intrusive field work. The other columns on the far right of the spreadsheet are the estimated scope of work for the IHSSs based on the Phase I RFI/RI Work Plans and outyear budgeting efforts. Overall, this IHSS selection effort is still in a "draft" stage and revisions will be made. As more information is collected the spreadsheets will be updated.