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OF HEALTH

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May 8, 1992

Mr. Frazer Lockhart
U. S. Department of Energy
Rocky Flats Plant
Building 116
P. O. Box 928
Golden, Colorado 80402

RE: FINAL, PHASE I RFI/RI WORK PLAN FOR OU-11 (West Spray Field)
U. S. DEPARTMENT OF ENERGY, ROCKY FLATS PLANT, March 16, 1992.

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division) and the U. S. Environmental Protection Agency (EPA) have reviewed the subject document submitted by DOE and prime contractor, EG&G. Based on our review, the Division, as lead agency, hereby grants conditional approval to the Workplan.

Four issues must be addressed before field work proceeds:

- o the EMD SOP GT.8 must be revised to include procedures for vertical profile soil sampling relative to radionuclides,
- o the EMD SOP GT.8 must be revised to include procedures for the Tube Sampler relative to non-radionuclide soil sampling,
- o the adequacy of tests pits to alone meet the statistical performance measures of power and confidence for radionuclides,
- o the OU specific Health & Safety Plan must be submitted.

Additional items that should be provided or considered, but which do not impact initiation of the workplan are:

- o a modified, conceptual model flowchart, Figure 2-10, should be incorporated into the document,
- o development of a sound technical memorandum for surficial soil scrapes, to confirm HPGe negative results and provide data on non-gamma emitters.

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- o Additionally, the concept of Potential Chemical-Specific Benchmarks, as proposed in DOE's letter dated March 25, 1992 has been approved. The Benchmark tables, which only contain standards for ground water and surface water, are currently being compared to State and Federal standards to verify their completeness and accuracy. Air and soil standards are also being reviewed as potential Benchmarks. Once the actual Benchmark tables are approved, the existing ARARs section must be replaced with the new tables and supporting narrative.

The Division's full comments, and those provided by EPA, are attached. Current modification of the RFI/RI Workplan should be limited to Figure 2-10 and the addition of the Health and Safety Plan. However, if inclusion of radionuclides in soil sample analytical suites becomes necessary, revision of the appropriate sections and tables will be expected. Revisions to SOP, GT.8 (per Document Change Notices) must be delivered before work is initiated.

The Division will lift the conditional status of the approval upon deliver of an adequate SOP GT.8 and satisfactory resolution of the radionuclide issue. Please respond by June 19, 1992.

If you have any questions concerning these comments, please contact Harlen Ainscough of my staff at 331-4977.

Sincerely,



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

Attachments

cc: Daniel S. Miller, AGO
Martin Hestmark, EPA
Bill Fraser, EPA
Bob Birk, DOE
Paul Bunge, EG&G
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