

# STATE OF COLORADO

3541 RFP4

Joy Romer, Governor  
Patricia A. Nolan, MD, MPH, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

SEP 15 1 55 PM '94



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EG&G  
ROCKY FLATS PLANT  
CORRESPONDENCE CONTROL

Colorado Department  
of Public Health  
and Environment

DIST.	LTR	EX
BLINGAME, A.H.		
BY, W.S.		
BNIVAL, G.J.		
DOVA, R.C.		
IS, J.G.		
RERA, D.W.		
Y, R.E.		
S, J.A.		
VER, W.S.		
AN, P.M.		
NI, B.J.		
LY, T.J.		
AHL, T.G.		
IG, J.G.		
CHINS, N.M.		
KSON, D.T.		
L, R.E.		
STER, A.W.		
IX, G.E.		
ONALD, M.M.		
ENNA, F.G.		
GAN, R.V.		
UTO, V.M.		
TER, G.L.		
DLIN, N.B.		
TERWHITE, D.G.		
UBERT, A.L.		
WARTZ, J.K.		
OCK, G.H.		
ER, S.G.		
N, P.M.		
RHEIS, G.M.		
ON, J.M.		

September 2, 1994

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

RE: OUI1 Process Improvement Proposal

Dear Mr. Slaten,

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division), considered your 94-DOE-06354 proposal to streamline the investigation and closure of OUI1, the West Spray Field.

In our October 13, 1993 correspondence, we supported the integration of field work into a single-phase investigation. We believed approach eliminated the need for a separate, stand-alone Phase II effort and would significantly reduce the length of the overall project. However, we find your proposal to be beyond the scope of the Division's guidance, which was only to combine the Phase I and II RFI/RI efforts into a comprehensive, full pathways investigation.

DOE's proposal is predicated on the assumption that the full pathways RFI/RI investigation will support a No Further Action decision at OUI1. It is the Division's belief that this assumption is premature and that no decision can be anticipated until fully useable and validated data from a full pathways effort is evaluated. If action is warranted, closure of this hazardous waste land treatment facility will be accomplished through either the IM/IRA and CAD/ROD process established in the IAG, or the closure and CAD/ROD process proposed in the RFCA. Either way, any remedial action at OUI1 must still satisfy the closure requirements of Section 265, Subpart of the Colorado Hazardous Waste Act, and CERCLA.

For planning purposes, the Division can accept an approach that presumes a No Action remedy selection for OUI1 at this time. However, a final decision on the proper remedial course to pursue cannot be made until the RFI/RI Report is finalized and approved. Once the RFI/RI Report is available that clarifies whether or not action needs to be taken, subsequent milestones can be set. Accordingly, the Division is resetting only the submittal dates for the RFI Reports as follows:

Submit Draft RFI/RI Report	7/20/95
Submit Final RFI/RI Report	9/19/95

The Division appreciates DOE's efforts at streamlining this project, providing both schedule and cost savings. We anticipate a continued collaborative working relationship as this proposal is implemented. If you have any questions regarding these matters, please call Dave Norbury at 692-3415.

Sincerely,

RES. CONTROL	X	X
RECORD/080	X	
1130G		

Joe Schieffelin, Unit Leader  
Rocky Flats IAG Unit  
Hazardous Waste Control Program

1-15-94 BY cc:

Arturo Duran, EPA  
Dave George, DOE  
Kelly O'Neill, EG&G  
Laura Perrault, AGO  
Steve Tarlton, RFPU

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