



**ROY ROMER**  
Governor

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August 5, 1992

Mr. Frazer Lockhart  
U.S Department of Energy  
Rocky Flats Plant  
Building 116  
P. O. Bpx 928  
Golden, Colorado 80402-0928

**RE: COMMENTS; DRAFT, RFI/RI WORKPLAN, ROCKY FLATS PLANT,  
400/800 AREA (Operable Unit No. 12), May, 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. The Division's and EPA's comments are attached.

The Division's comments are of a specific nature; however, a few general observations may be drawn from the body of the comments. They are:

- o Discussions of specific IHSSs in Sections 2 and 6 (and Table 6.1) should be subdivided, as indicated, to improve clarity for work plan review and subsequent implementation.
- o The staged approach alluded to in the work plan should be set forth formally in a manner comparable to the OU-10 Work Plan.
- o The adequacy of the Field Sampling Plan (FSP) to address the Uranium Machine Tool Storage Area, Ingot Open Storage Area, the roof of Building 447, and the Sulfuric Acid Spill are questioned.
- o The chromic acid release reported under UBC 444 should be included for investigation under this work plan.
- o Determination of nature and extent of contamination, as well as obtaining data for a Baseline Risk Assessment, is to be a primary goal of the investigation (through a staged approach).

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- o The exclusion of ground water from the site conceptual model is unacceptable and the model is incomplete.
- o The HPGe grid spacing and instrumental capabilities are questioned.
- o Soil sampling procedures and sample splitting requirements are unclear to inconsistent and must be referenced to an amended SOP GT.8.
- o Rationales for sampling activities and methodologies should be described.

For these and other reasons discussed in the Division's comments and the attached EPA comments, DOE must revise the work plan.

If you have any questions concerning the Division's comments, please call 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  
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