

STATE OF COLORADO

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

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Executive Director

May 27, 1993

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

RE: Modification to Work in the IAG

Dear Mr. Schassburger,

Pursuant to Part 32, Paragraph 191 (Additional Work or Modification to Work) of the IAG, CDH and EPA hereby notify DOE that certain IHSSs included in Operable Unit 6 (Walnut Creek) and Operable Unit 16 (Low Priority Sites), and the investigatory and remedial work associated with them, are now to be addressed as part of alternate OUs as follows:

- IHSS 167.2, from OU 6 to OU 7 (Present Landfill);
- IHSS 167.3, from OU 6 to OU 7 (Present Landfill);
- IHSS 196, from OU 16 to OU 5 (Woman Creek);
- IHSS 197, from OU 16 to OU 13 (100 Area).

IHSSs 167.2 and 167.3 are areas that were used for spray evaporation of leachate-contaminated landfill pond water. Recent relocation of these IHSSs places both within OU 7's boundaries. Assessing the impact of spray evaporation activities around the pond is an integral part of OU 7's Phase I RFI/RI and it would be difficult to separate these poorly delineated IHSSs from those investigations. Furthermore, OU 7's field work has already performed surficial soil and subsurface soil sampling across these areas, whereas OU 6 has not.

IHSSs 196 and 197 were originally grouped into OU 16 because of the likelihood that previous remediation efforts and/or natural environmental processes at these sites have eliminated the need for any further remedial response actions. However, the Risk Assessment Analysis performed in the Final No Further Action Justification Document determined that at IHSSs 196 and 197 further investigation is warranted. This is due to the possibility that complete exposure pathways may exist because previous removal actions may not have prevented release and migration of contaminants.

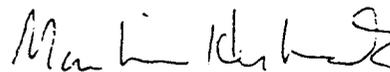
EPA and the Division consider these changes to be a modification to work associated with implementation of the IAG and are effective immediately. Although these changes were recommended by DOE, if you do not agree with any of these changes, you may invoke appropriate dispute-resolution procedures within 14 days. However, we would appreciate early notice of your disagreement so that an attempt can be made to resolve differences before dispute-resolution is invoked.

If you have any questions regarding IHSSs 167.2 and 167.3, please contact Carl Spreng (CDH) at 692-3358 or Bill Fraser (EPA) at 294-1081. For questions involving IHSSs 196 and 197, please call Jeff Swanson (CDH) at 692-3416 or Arturo Duran (EPA) at 294-1080.

Sincerely,



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



Martin Hestmark, Manager
Rocky Flats Team
EPA, Region VIII

cc: Dan Miller, AGO
Jackie Berardini, CDH-OE
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