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Rocky Flats Environmental Technology Site
P. O. Box 464
Golden, Colorado 80402-0464
Phone: (303) 966-2677
Fax: (303) 966-8244

August 10, 1995

Stephen J. Hahn
Kaiser-Hill, L.L.C.

SUBMITTAL OF OPERABLE UNIT 15 FINAL CORRECTIVE ACTION DECISION/RECORD OF DECISION, AND COMPLETION OF INTERAGENCY AGREEMENT MILESTONE (Subcontract No. KH00003NS1A) – JEL-009-95

Rocky Mountain Remediation Services, L.L.C. and Kaiser-Hill, L.L.C. have met the requirements of the Interagency Agreement (IAG) milestone by providing the Department of Energy/Rocky Flats Field Office (DOE/RFFO) with a final Corrective Action Decision/Record of Decision (CAD/ROD) for Operable Unit 15 (OU 15) on August 9, 1995. The draft letters provided to you by Dr. William Fitch are not correct when they state that additional steps must be taken to meet the IAG milestone. Consistent with previous experience in closing OU 16 and with other IAG milestones contained on Table 6 of the IAG, the only step required is for DOE/RFFO to transmit the Final CAD/ROD to the U.S. Environmental Protection Agency (EPA) and the Colorado Department of Public Health and Environment (CDPHE).

The draft DOE letters regarding the OU 15 milestone completion are contradictory and contain incorrect information. The DOE/RFFO draft letter to the DOE Headquarters contains the following contradictory statements: "The Interagency Agreement Milestone established for this document is: Submit the CAD/ROD by September 30, 1995" and "The milestone will be met when the Manager, RFETS, signs the document."

The draft DOE letter to the EPA and CDPHE states "The Interagency Agreement Milestone established for this document is: Submit the CAD/ROD by September 30, 1995." The letter also states that the process for meeting the IAG milestone is obtaining DOE Headquarters' approval and obtaining signatures from the EPA, CDPHE, and the DOE. Within the IAG, milestones are completed based upon submittal of documents, not approval or signature of documents.

We request that Kaiser-Hill explain to Dr. Fitch that Kaiser-Hill's requirements for completing the IAG milestone have been met. Attached are copies of Dr. Fitch's transmittal letters with our suggested corrections.


John E. Law
Remediation Manager
Sitewide Actions

WMK:dqj



ADMIN RECCRD

17

United States Government

Department of Energy

memorandum

Post-It™ brand fax transmittal memo 7671		# of pages > 4
To <i>William Katz</i>	From <i>Spencer Johnson</i>	
Co.	Co.	
Dept.	Phone #	
Fax # <i>8774</i>	Fax #	

DATE:

REPLY TO

ATTN OF: ER:ERG:WNF

SUBJECT: Request for Approval
 Corrective Action Decision/Record of Action
 Operable Unit 15: Inside Building Closures
 Rocky Flats Environmental Technology Site

TO: Mr. Ralph Lightner, Director, Office of Southwestern Programs
 EM-45 *fulfilling the September 30, 1995 IAG Milestone for OUIS.*

final
 Enclosed is the Corrective Action Decision/Record of Action (CAD/ROD) for Operable Unit 15: Inside Building Closures. This CAD/ROD document enunciates the decisions presented to the public jointly by the Department of Energy, the Environmental Protection Agency and the Colorado Department of Public Health and Environment in a public hearing conducted on June 20, 1995. The public comment period for the Proposed Plan was open from May 17 to July 17, 1995. The Responsiveness Summary included with this CAD/ROD provides responses to the comments received from the public.

The Interagency Agreement Milestone established for this document is:

The transmittal of the CAD/ROD to the EPA and CDPHE fulfills the IAG Milestone

Submit the CAD/ROD *to EPA and CDPHE* by September 30, 1995.

The process for ~~completing this~~ CAD/ROD *is adoption*

- o Obtain Headquarters approval
- o Obtain EPA and CDPHE agreement that the CAD/ROD is ready for signing
- o Signing by Manager, Rocky Flats Environmental Technology Site

HUG-10-30 IMU 9:10

- o Signing by Environmental Protection Agency,
Region VIII
- o Signing by Colorado Department of Public Health and
Environment

This memorandum requests your approval of the CAD/ROD. ~~We have requested EPA and CDPHE agreement via separate memorandum. The milestone will be met when the Manager, RFETS, signs the document.~~

Jessie Roberson
Assistant Manager for Environmental
Restoration

cc:
J.D. Wienand, ER, RFFO
Manager, RFFO
Brockman, RFFO
S. Hahn, Kaiser Hill
S. Schubbe, Rocky Mtn Remedial Services

95-DOE-140xx

Mr. Joe Schieffelin
Hazardous Waste Facilities Unit Leader
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Mr. Martin Hestmark
U.S. Environmental Protection Agency, Region VIII
ATTN: Rocky Flats Project Manager, 8HWM-RI
999 18th Street, Suite 500, 8WM-C

*fulfilling the
Sept. 30, 1995 IAG
Milestone for OHS.*

Gentlemen:

Enclosed is the ^{final} Corrective Action Decision/Record of Decision (CAD/ROD) for Operable Unit 15: Inside Building Closures. This CAD/ROD document enunciates the decisions presented to the public jointly by the Department of Energy (DOE), the Environmental Protection Agency (EPA), and the Colorado Department of Public Health and Environment (CDPHE) in a public hearing conducted on June 20, 1995. The public comment period for the Proposed Plan was open from May 17 to July 17, 1995. The Responsiveness Summary included with this CAD/ROD provides responses to the comments received from the public.

The CAD/ROD has been forwarded to the Department of Energy Headquarters for their review and approval. This initiates the process that culminates in the signing of the CAD/ROD by the Environmental Protection Agency and the Department of Public Health and Environment. The Interagency Agreement Milestone established for the CAD/ROD is:

Submit the CAD/ROD ^{to the EPA and CDPHE} by September 30, 1995.

The process for ~~meeting this milestone and completing this CAD/ROD~~ ^{is:}

Obtain DOE Headquarters approval

Obtain EPA and CDPHE agreement that the CAD/ROD is ready

The transmittal of the attached CAD/ROD to the EPA and CDPHE fulfills the IAG Milestone

adoption

for signing

Signing by Manager, Rocky Flats Environmental
Technology

Signing by Environmental Protection Agency,
Region VIII

Signing by Colorado Department of Public Health and
Environment

This memorandum requests that you initiate your internal departmental review and approval process in order to be ready to provide assurances to DOE that the CAD/ROD is ready for the Manager, Rocky Flats Environmental Technology Site, to sign upon obtaining DOE Headquarters approval.

We expect DOE HQ approval to be given by August 20.

Jessie Roberson
Assistant Manager for Environmental Restoration

cc:

J.D. Wienand, ER, RFFO

Chief of Staff, RFFO

Brockman, RFFO

S. Hahn, Kaiser Hill

D. Schubbe, Rocky Mtn Remedial Services

STATE OF COLORADO

Roy Romer, Governor
Patu Shwayder, Acting Executive Director

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

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

4300 Cherry Creek Dr. S. 222 S. 6th Street, Room 232
Denver, Colorado 80222-1530 Grand Junction, Colorado 81501-2768
Phone (303) 692-3300 Phone (303) 248-7164
Fax (303) 759-5355 Fax (303) 248-7198



Colorado Department
of Public Health
and Environment

April 24, 1995

Steve Slaten
IAG Project Coordinator-ER
Department of Energy
Rocky Flats Office
P.O. Box 928
Golden CO 80402-0928

**RE: Draft Proposed Plan and Draft Permit Modification for OU 15;
Certification of RCRA Closure for OU 15 IHSSs**

Dear Mr. Slaten:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) has reviewed the draft Proposed Plan/Draft Permit Modification for OU 15. The Division suggests that it would be useful to add that clean closure has been certified by an independent professional engineer in a Certification of RCRA Closure. The second paragraph under "Summary of Remedial Alternative" is an appropriate place to add this statement. In addition, the "Public Involvement Process" section should provide the date and location of any anticipated public meeting(s).

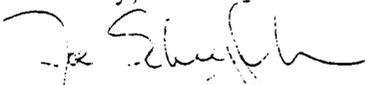
The Certification of RCRA Closure for OU 15 IHSSs prepared by WASTREN, Inc. and submitted to the Division is approved without comment.

The proposed milestone date of September 30, 1995 for submission of the final CAD/ROD is acceptable. The schedule which supports this milestone is considerably compressed, but appears to be achievable. A 45-day public comment period is the minimum required for review of the Proposed Plan/ Draft Permit Modification. The Division supports a 45-day public comment period even though it represents a departure from the generic public comment period of 60 days for decision documents that has been the norm under the IAG.

6

If you have any questions regarding these matters, please contact Carl Spreng at (692-3358).

Sincerely,



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

cc: Bill Fitch, DOE
Dennis Schubbe, EG&G
Martin Hestmark, EPA
Arturo Duran, EPA
Laura Perault, AGO
Steve Tarlton, RFPU

7/7