

U. S. DEPARTMENT OF ENERGY
ROCKY PLATS PLANT
ENVIRONMENTAL RESTORATION PROGRAM WEEKLY REPORT
WEEK ENDING NOVEMBER 20, 1992

Section I - Interagency Agreement

OU 1 - 881 Hillside

Assessment -The regulatory agencies have not begun their review of the Draft RFI/RI report submitted to them on October 28, 1992. However, the agencies are informally discussing significant revisions or changes to this report. There is still the issue of ingestion as a pathway in risk assessment.

Work on the draft CMS/FS is underway.

RFO and EG&G met on November 13, 1992, with the regulatory agencies to discuss the schedule extension request that was denied by the agencies. Technical arguments were presented by EG&G on the successive decisions required to do the Feasibility Study (FS) work correctly. The regulatory agencies were adamant that regardless of technical considerations, time lost on the RI was to be made up during the FS. Another letter requesting a 90-day extension for the FS will be sent to the agencies. If the regulatory agencies deny this request, RFO will decide whether or not to dispute the decision or proceed with the FS. Also, additional funding would be required because the FY93 work package does not have the funds to meet the FS schedule.

The presence of an anomously high plutonium soil contamination location has been detected in the area adjacent to where the uranium rings were found in March/February 1992. EG&G is evaluating this and potential impacts to the RFI/RI Report.

OU 2 - 903 Pad, Mound, East Trenches Area

Phase II RFI/RI Report -- EG&G has resumed work on the Draft RFI/RI Report and Risk Assessment Technical Memorandum as well as a Technical Memorandum to locate the Bedrock Confirmation/Monitoring wells. Initial reaction by the agencies was positive. EG&G will have a revised schedule on December 1, 1992. RFO will formally ask for an extension of the IAG milestones and present a new schedule for OU 2 Assessment on December 16, 1992.

Subsurface Interim Measure/Interim Remedial Action (IM/IRA) -- The Pilot Test Plan, *In Situ Volatilization Technology, Subsurface IM/IRA*, was delivered to the regulatory agencies on October 29, 1992, the added IAG milestone date. Agency comments are due on November 26, 1992. The final version of this first test plan is scheduled for submittal to EPA and CDH on January 12, 1993. Inspection and system startup to begin pilot testing in the field is scheduled for September 15, 1993.

OU 3 - Offsite Releases --No activity to report this week

OU 4 - Solar Evaporation Ponds --The Vadose Zone Investigation Technical Memorandum (TM) was delivered to EPA and CDH on November 16, 1992. RFP has requested comments from the regulatory agencies by November 30, 1992 and conditional approval to implement the vadose zone plan.

The radiological survey for Pond 207 A was completed over the weekend of November 14 & November 15, 1992. The report from the radiological survey is

in the process of being developed by EG&G Radiological Engineering. The ~~conclusions from the radiological report will provide the appropriate criteria~~ for personal protective equipment (PPE) and environmental characterization results.

The alpha survey was conducted in the interceptor trench system area the week of November 9, 1992. The radiological surveys are pre-requisites to intrusive sampling.

OU 5 - Woman Creek -- Work on the HPGe survey at IHSS 133 has temporarily stopped. The tripod-mounted HPGe detectors that are in use are being characterized and configured to be fitted onto the truck-mounted system. The system should be ready for deployment the first week in December 1992.

The Geophysical surveys are in progress at IHSS 133 and still on schedule to be completed by November 20, 1992.

The Draft TM #3, Surficial Soil Sampling at IHSS 115, was completed November 20, 1992. The Draft TM #5, Soil Gas Survey, which was due internally on October 28, 1992, cannot be completed until the results of the electromagnetic (EM) and magnetic surveys are reviewed and incorporated into TM #5. The expected delivery date for TM#5 is November 30, 1992. The draft of TM#7, Soil Borings-Ash Pits, will be completed on November 27, 1992.

OU 6 - Walnut Creek -- Sediment sampling is 80 percent complete in the ponds (IHSS 142). Sampling was interrupted due to an immediate need for the sampling crew to be placed on higher priority projects. Sampling will be completed in November.

Three drilling rigs are operational on IHSS 167. Approximately two productive rig days were lost due to mechanical downtime. Field sampling of small mammals and vegetation for the Environmental Evaluation is complete.

A November 12, 1992, meeting was held among RFO, EPA, and CDH. An agreement was reached on TM #1 that all proposals in the TM were agreed to in principle. Several changes were made in the location of the proposed surface water sampling locations. Toxicity testing was added to the sampling. Five bedrock wells (with accompanying quarterly sampling) were replaced with four borings. The meeting was productive as quality comments were received on the TM.

The TM #1 represents a reduction of scope which equates to a \$1 million savings in spite of the out of scope surface water sampling additions which were made to the OU 6 Work Plan.

OU 7 - Present Landfill -- Field operations for OU 7 Phase I RFI/RI Work Plan implementation continue. The FIDLER survey was completed with detectable levels above background. IHSS 203 surficial soil sampling is slated to begin November 23, 1992.

There was a schedule delay resulting from the subcontracted driller not arriving onsite as agreed upon and subsequently arriving late with inadequate equipment. The prime subcontractor and the project manager decided to explore other options with respect to identifying other drilling firms. A favorable alternate drilling subcontractor was identified, and efforts are underway to bring it on board early next week. The resulting delay to the drilling program is approximately 10 days. This delay will attempt to be made up by working Saturdays.

A question regarding the analysis of surface soils within the landfill to support the human health risk assessment was raised. The current Work Plan which received final approval from the agencies does not address surficial soils with the landfill (IHSS 114). Risk assessment personnel feel this type of sampling is necessary to support an analysis of upward pathways. Conversations with the agencies indicate that this may be necessary but feel that a minimal sampling effort is acceptable. Risk assessment personnel are developing a sampling strategy consistent with this guidance.

OU 8 - 700 Area -- A comment review meeting was held on November 17, 1992, concerning RFO comments on the Work Plan and Responsiveness Summary. Attendees included RFO, and subcontractor representatives. Based on the results of the meeting, the Draft Final Work Plan is being modified and the OU 8 Final Phase I RFI/RI Work Plan will be completed on November 25, 1992 for delivery to EPA and CDH on December 1, 1992 to meet the extended IAG due date.

OU 9 - Original Process Waste Lines --Due to the FY93 funding allocation, only a minimal level of effort for project management tasks is currently planned for OU 9 during FY93. It is being proposed to conduct OU 9 field work under the Industrial Area Interim Measure/Interim Remedial Action (IM/IRA).

OU 10 - Other Outside Closures --Due to the FY93 funding allocation, only a minimal level of effort for project management tasks will be performed on OU 10. It is being proposed to conduct OU 10 field work under the Industrial Area IM/IRA.

OU 11 - West Sprav Field --A proposal was made to streamline the field sampling in OU 11. CDH commented on this proposal by stating that the minimum data necessary to support a No Further Action Justification (NFAJ) would be at the same level required to support a risk assessment. CDH agreed that limiting field operations to a single phase would be mutually beneficial. CDH also agreed to attend a scoping meeting with RFO and EG&G in early December to assist in developing an acceptable field sampling scope. The usability of the HPGe detector data for risk assessment is currently being investigated. If this data is not acceptable for risk assessment, then the applicability of this technique with respect to new streamlining guidance needs to be evaluated.

A draft of the streamlining proposal is at RFO for review. This proposal calls for rescoping the field investigation to cover Phase I and Phase 2 objectives in a single event and to collect data adequate to support a risk assessment. The objective is to obtain data adequate to support a justification for no further action.

CDH responded to questions posed regarding the usability of HPGe data for risk assessment. The data is considered level II, field screening data only and not of high enough quality to be used for risk assessment. As far as the question of whether or not HPGe surveys are even beneficial for OU 11 operations, CDH would like EG&G to evaluate this and include an opinion in the proposal for rescoping OU 11 work.

OU 12 - 400/800 Areas --The Final OU 12 RFI/RI Work Plan was submitted to EPA and CDH on October 5, 1992, the IAG milestone date. CDH and EPA have given conditional approval of the Work Plan pending resolution of certain outstanding technical issues regarding the field sampling plan and Standard Operating Procedures. CDH has requested that the final corrections to the

Final Work Plan be completed and submitted no later than December 18, 1992.

All previously scheduled activities for FY93 will be delayed due to limited FY93 funding, and all planned field work will be addressed in the proposed Industrial Area IM/IRA.

OU 13 - 100 Area -- The OU 13 Final Phase I RFI/RI Work Plan was submitted to the agencies per the IAG scheduled milestone date of October 12, 1992. However, the Work Plan was not approved pending the resolution of two major issues: (1) Settlement of the ARARs/Chemical Benchmark Issues; (2) Approval of a more comprehensive surficial soils component to the FSP.

These issues are major and will entail considerable effort and time to resolve. Progress was made at two meetings held the week ending November 13, 1992, on the settlement of the ARARs/Chemical Benchmark issues. Representatives from CDH, Colorado's Office of the Attorney General (CAG), RFO, EPA and EG&G were present. The status of the Benchmark tables were discussed in detail. Comments on the Work Plan indicate that the CAG's position is that the Benchmark tables will be used to establish the data quality objectives (DQO) analytic detection limit. EPA didn't agree at the meeting with the CAG's comments; comments from EPA on the Work Plan have not been received.

Another meeting was held on November 13, 1992, with representatives from the Work Plan subcontractor to discuss expectations regarding the updating of the Benchmark tables. A schedule and scope of work is being developed. The goal is to have a corrected table delivered to the agencies as soon as possible.

Approval of a more comprehensive surficial soils component to the FSP is under discussion because it is not required in the IAG and is not budgeted. The Work Plan contains 54 surface soil samples which is sufficient to do a baseline risk assessment.

The proposed budget for FY93 is inadequate to meet the next IAG milestone scheduled for August 8, 1994, the delivery of the OU 13 Phase I RFI/RI Report. It is also clear that the proposed budget is not enough to complete even basic administrative and planning tasks if work on the OU is curtailed due to funding.

OU 13 is at a crossroad. A decision needs to be made whether to go forward and provide the necessary funding to begin field activities and resolve policy decisions this fiscal year or to postpone activities for one year. If a decision is made by December 1, 1992, there should be no delays in meeting the next IAG milestone scheduled for August 8, 1994. However, a decision made after December 1, 1992, will result in schedule delays.

OU 14 - Radioactive Sites -A letter was received on November 16, 1992 from EPA granting approval for the Final Phase I RFI/RI Work Plan for OU 14. AN EPA November 19, 1992 letter withholds approval of the Work Plan pending acceptable scope and schedule for the IA IRAP. All previously scheduled activities for FY93 will be delayed due to limited FY93 funding, and all planned field work will be addressed in the proposed Industrial Area IM/IRA.

OU 15 - Inside Building Closures -- The procurement process started for implementation of the OU 15 Phase I RFI/RI Work Plan.

The inside buildings tour of OU 15 IHSSs conducted on November 11, 1992 was attended by CDH, RFO and EG&G representatives. EPA toured the OU 15 IHSSs on

November 4, 1992. The tour was held to familiarize OU 15 personnel with the physical setting of the IHSSs.

Comments from the regulatory agencies on the OU 15 Final Phase I RFI/RI Work Plan are expected based upon the tour of OU 15. Two IHSSs expected to be discussed in EPA and CDH comments on the Work Plan are the Original Uranium Chip Roaster (IHSS 204) and the Cyanide Bench Scale Treatment Area (IHSS 217). The specific nature of the comments are unknown at this time; however, touring the IHSSs probably raised questions regarding the feasibility of performing the Work Plan specified field sampling plan within the roaster and chemical hood of IHSSs 204 and 217, respectively.

OU 16 - Low-Priority Sites -- The Final No Further Action Justification Document for OU 16 is currently being reviewed for approval by EPA and CDH. A response from the regulatory agencies concerning approval is expected by November 20, 1992.

Further activities are not planned for the current fiscal year.

Sitewide Activities

Administrative Record -- The only Administrative Record (AR) files that have received approval from EPA and CDH for release to the public are OU 2, OU 4, and Sitewide. AR files for OUs 1, 3, 5-16 have not been approved for release to the public. This lack of approval is causing a problem with meeting CERCLA requirements which state that the AR File is to be made available for public review at the beginning of the public comment period for OU decision documents. Approval is needed for all OUs (1-16) so the AR File can be placed in public repositories and updates can be made available to the public quarterly as required by CERCLA.

The AR quarterly index was completed November 3, 1992, delivered to RFO on November 9, 1992, and will be submitted to EPA and CDH on November 23, 1992. An update of the microfiche and index for OUs 2 and 4, and Sitewide is scheduled for delivery to the public repositories by November 23, 1992.

The AR screening and processing procedure is in the last stage of review. This procedure is scheduled to be issued by November 25, 1992. The screening and processing procedure will be used for internal control of the administrative record per quality assurance procedures.

Sample Management Office -- The Sample Management Office (SMO) is the system that tracks the sample from collection to archive. This includes the technical interfaces, laboratory audits, contracting with laboratories and data validation. SMO priorities are to provide adequate quantities and quality of laboratories; track and report on sample status and provide technical support to ER Management on analytical issues.

Field crews are currently working on 23 sampling projects under 15 programs at RFP. As of Monday, November 16, 1992, there were 93 soil/sediment, 128 water, and 250 biota samples in the queue for radiochemistry analyses. An additional 89 core, 50 fish and 3 air samples are on hold for requisite contract modifications.

Laboratory capacity coordination is daily and sometimes hourly due to heavy sampling volume from RFP. Samples shipped during the week of November 9-14, 1992, are as follows:

ground water 25
OU 2 4 water
OU 3 3 water, 11 sediment
OU 5 10 sediment
OU 6 32 water, 67 soil

Sample management issues affecting ER work will be reported as available.

PROGRAM MANAGEMENT

Resolution of FY93 Work Scope - - Progress continued towards reconciling the work scope in the FY93 work packages, the OMB FY93 funding allocation in the President's Budget and the FY93 funding allocation in the FY94-FY98 Five-Year Plan (FYP). A presentation of the results to date and the proposed work scope of the FY93 work packages will be made to HQ on November 23, 1992.

The RFP ER Program FY93 Work Packages were developed incorporating changes from the FY94-FY98 ADSs. The changes resulted from the apparent discrepancy between between the work scope defined in the FYP ADSs and the available resources. New requirements, unfunded work carried over from FY92, scope increases and cost increases as well as the unplanned funding holdback of \$12M by DOE all contributed to the discrepancy between work scope and required resources. A plan to most effectively use the available resources which included the deferral of planned work in several operable units to future years was developed and incorporated into the FY93 work packages.

Response to Request from DOE/HQ for Visual Aids - - Effort was completed on the assembly of materials to respond to a request from DOE/HQ for visual aids, and the materials were expresse mailed to HQ on November 16, 1992. The materials will be used for story boards to to assist HQ staff in Congressional and Secretarial budget presentations and other public forums. Information was requested for the Pondcrete and Surface Water Projects and for the OU1 and OU2 IRAs.

Section II - Pondcrete Activities

Program Management

The Program Office completed a "no cost" extension to the Halliburton-NUS contract which extends the subcontract performance period to November 30, 1992. The performance extension will allow the Solar Pond Program Office time to prepare a statement of work that will curtail HNUS' efforts for the period from November 30 to February 28, 1993.

Jim Zane, Bob Benedetti, and Ed Lee, all from EG&G RFP, met with Leo Duffy on Nov 12th to discuss Solar Pond Program options and to identify additional funding needed for the program. Duffy indicated that no additional funds are available but that he will ask for a supplemental FY93 appropriation from Congress. Duffy believes that chances of receiving the supplemental funding are not good. Duffy directed the RFP representatives to look at cheaper ways to get the job done and more reasonable interpretations of RCRA. As a result of that meeting, the Solar Ponds Program will continue with the plan for cementation; however, the Halliburton effort will proceed at a slow, keep

alive pace.

Work package managers began a "scrub" of their work packages to identify any areas where costs can be cut. Concurrence and sign-off from affected organizations will be obtained. Work package managers will also identify possible scope reductions that would require RFO or Regulator concurrence. While the major emphasis of this review is to identify cost saving alternatives or reductions to scope, some additional costs or increases to scope may be identified.

A protocol has been developed regarding review by Engineering and Technology (E&T) of Halliburton-designed equipment and installations to be used in the solar pond remediation effort. E&T will review designs for compliance with Halliburton (Brown and Root) criteria transmitted to the Program Office on July 24, 1992 as Deliverable 431. For those elements of the design which comply with the Halliburton criteria but do not also comply with applicable EG&G/RFP criteria, E&T will note the non-compliance in its review comments. The Program Office will assume responsibility for resolving all non-compliances.

The detailed design package for the rework necessary to repair the generator engines has been received from the vendor, Licon, Inc. The package has been transmitted to Engineering and Technology for an analysis to ensure that critical objectives of the rework are met by the design.

Section III - Surface Water Management

Operating, Administrative and Regulatory Impacts of a Change in Regulatory Drivers for Surface Water Impoundments at Rocky Flats Plant are explained in the following paragraphs.

On June 26, 1992, EPA officially informed DOE of their decision to regulate the surface water impoundments at RFP under RCRA and CERCLA rather than the Clean Water Act's National Pollutant Discharge Elimination System (NPDES). EPA also announced that the agency would not allow the use of the upper ponds (A-1, A-2, B-1, and B-2) for containment and storage of spills. The letter formalizes the decision announced at a meeting with EPA, RFO and EG&G on December 19, 1991. A number of changes have taken place at Rocky Flats in the seven months it has taken EPA to write a two page letter. Most importantly, the mission of the plant has changed and it appears that all production activities will be permanently suspended. A number of projects, initiated at the direction of DOE and driven by various permits and agreements, have been completed or are near completion, such as the Surface Water Management Plan (SWMP) and the Spill Prevention Control Countermeasures and Best Management Practices Plan (SPCC/BMP). These documents, produced at substantial cost to DOE, will require further revision and public review to reflect the changing environmental controls of surface waters at Rocky Flats. It appears that the EPA decision was made irrespective of changes made by RFO in the past six months, changes which may have an impact on regulatory interpretation.

Subsequent to the December, 1991, meeting, EG&G Surface Water Division (SWD) staff and subcontractor personnel have developed a general scope of the changes mandated by the EPA action. Wright Water Engineers drafted a report on the alternatives available for providing off-line storage of sufficient capacity to meet the EPA requirement to provide alternative storage for spill control. Estimates range up to \$50 million to provide adequate capacity to meet RCRA/CERCLA requirements. A number of administrative changes have also been identified as being required to accommodate the increased burden of this action.

IMPACTS OF THE REGULATORY CHANGE

Converting control of the RFP ponds from NPDES to CERCLA/RCRA has a number of implications for the operation of the ponds, the role they play in controlling storm water runoff from the plant site, and the avenues of input RFO and EG&G would have in managing the surface waters. The following points represent just some of the implications of this EPA decision.

Negative Impacts

1. The EPA decision represents unilateral action by the agency without consultation with the affected federal agency. This does not seem to be consistent with Executive Order 12088, which covers pollution control at federal facilities, and requires the concurrence of the Office of Management and Budget (OMB).
2. EPA attorney Peter Ornstein stated emphatically at the December meeting that this was not a major federal action and did not require activation of any NEPA processes. His opinion may not be substantiated. As these points indicate, there are substantial costs associated with this action, which were probably not considered by the agency, and, at the very least, would require OMB review. If an IM/IRA, an Environmental Assessment (at the minimum) would be required.
3. RFO has authorized a major project to describe surface water management at RFP, the Surface Water Management Plan. It was produced at substantial cost and could be severely impacted by changes in the regulatory status of the ponds.
4. EPA stated flatly that the surface waters at RFP were considered waters of the United States, citing the agency's numerous successes in court cases challenging their authority to make such determinations. The "reasonable bird" theory was used - if a goose can land on the ponds, they are waters of the U.S. RFP documents show that the ponds were designed and built for spill containment and runoff control and treatment. Such uses conflict with the water of the United States argument.
5. The change in regulatory status of the ponds could have an impact on the implementation of Option B. Great Western Reservoir is also identified as a CERCLA site, and if the RFP ponds are incorporated into the IAG process, so must Great Western and the Option B process. Standly and Great Western are already IHSSs. Furthermore, the OMB review of Option B may have to be redone if new regulatory requirements apply to the reservoir.
6. The fiscal impacts of this change to operations within Environmental Management are uncertain at this point. Additional staffing will likely be required to address the substantial administrative requirements of CERCLA/RCRA documentation.
7. The NPDES permit will now cover only the discharge from the RFP waste water treatment plant and storm water runoff under the storm water permitting process. Control of pollutants at the outfall of the WWTP are generally good, but discharge limits are not the same as water quality standards in the receiving water. The classification as CERCLA would require the application of water quality standards as Applicable or Relevant and Appropriate Regulations (ARARs), limitations which are substantially more restrictive than the NPDES permit limitations. Major upgrades to the WWTP are currently budgeted at over \$8 million based on the existing requirements of the NPDES permit and the Federal Facilities Compliance Agreement (FFCA). The advanced treatment additions would have to be revisited in light of these announced changes, and may add considerable costs to further upgrade the WWTP.

8. The classification of all surface water at RFP is now in question. Storm water runoff will be regulated by the NPDES permit, but its classification may change as it flows into the terminal ponds. If runoff quality is regulated in the next and/or subsequent permits, limitations could be applied at the six monitoring points surrounding the core area of RFP rather than at the more logical storm water control points at the terminal ponds. Of all of the aspects of the surface water management at RFP, this could be the most crucial. The ponds provide sediment removal capacity, greatly reducing contaminant loads.

9. This action was taken without review of the status of RFP operations. No alternatives were considered based on possible changes in operations at RFP, especially in light of the newspaper headlines on the day of the meeting which stated "Closure[of Rocky Flats] in January or February very clear, Wirth says".

10. The IAG is now included by reference in the RFP RCRA Permit issued by the state. Current management practices include treatment at the ponds prior to discharge; such treatment may now be subject to RCRA requirements, including the handling of all materials, such as filter socks, as hazardous wastes.

11. The SWD has budgeted funds for strengthening the existing dams to improve safety. Expenditures for dam improvements may be questionable if the dams and ponds are targeted for removal under this action.

12. Is the EPA decision telling DOE how to operate its plant i.e. that the ponds are no longer needed to operate and that a closure plan is required? or that the ponds, previously covered in two NPDES permits, are not legal and DOE is currently operating illegally?

13. If the ponds are no longer available for runoff and flood control, alternative "off-line" storage would be required. Current estimates range up to \$50 million to provide storage for 300 acre-feet of runoff, the volume currently stored in the A- B- and C- series ponds.

14. DOE and EG&G are currently preparing the SPCC/BMP plan required under the NPDES permit. The provisions of this plan could require substantial revision, at additional cost, as a result of the regulatory change.

15. Any suggestion that the ponds be removed is, at a minimum, contrary to professional engineering practice in providing storm water control using best management practices. In fact, it is a standard practice across the country to construct wet retention facilities within natural drainage ways. Several consultants have commented that if RFP were to initiate pond construction today to do what the existing ponds do, they would be sited exactly where they are.

16. Potential penalties under CERCLA/RCRA differ from those applicable under the Clean Water Act. If the ponds become RCRA permitted facilities, fines could be imposed by the state. Coincidentally, the state would also be responsible for setting the standards which the discharge would have to meet. It seems possible that a situation is being created in which the state could make it impossible to discharge, or, at least, to overcome the current state budget deficits.

Positive Impacts

1. The option of a pipeline from the RFP WWTP to the Northglenn plant becomes more attractive under the changed regulatory status of the ponds. Cost of the pipeline is likely to be lower than added treatment for ammonia removal and

effluent storage now budgeted under the FPCA requirements. Northglenn has ~~already indicated an interest in this option because the city's existing waste~~ water treatment plant is operating at only about one-half capacity. Additional waste water flows would increase the efficiency of operation.

RECOMMENDATION

At a minimum, this decision should be subjected to intense scrutiny under applicable administrative laws, and, if necessary, put before a court for final determination. This is a decision squarely in the hands of DOE. RFP is at risk of having an operation where three laws and sets of regulations (NPDES/CERCLA/RCRA) overlap, virtually guaranteeing the inability to meet all requirements of all laws.

Water Quality Control Commission Hearings

RFO personnel working closely with EG&G and other outside legal support, prepared supplemental testimony for the continued Colorado Water Quality Control Commission hearings on Rocky Flats surface waters. Fifteen copies of the testimony were hand-delivered to the Commission's office by the November 12, 1992, deadline. Rebuttal statements are due November 23, 1992, and the hearing is scheduled for December 7, 1992. RFO and EG&G personnel will appear as witnesses for Rocky Flats.

Section IV - Transition/Decontamination and Decommissioning

Section V - Meetings

OU 1 - 881 Hillside Assessment -RFO and EG&G met on November 13, 1992, with the regulatory agencies to discuss the schedule extension request that was denied by the agencies. Technical arguments were presented by EG&G on the successive decisions required to do the Feasibility Study (FS) work correctly. The regulatory agencies were adamant that regardless of technical considerations, time lost on the RI was to be made up during the FS. Another letter requesting a 90-day extension for the Draft FS will be sent to the agencies. If the regulatory agencies deny this request, RFO is in the process of deciding whether to dispute the decision or proceed with the FS. Also, additional funding would be required because the FY93 work package does not have the funds to meet the FS schedule.

OU 6 - Walnut Creek --A November 12, 1992, meeting was held among RFO, EPA, and CDH. An agreement was reached on TM #1 that all proposals in the TM were agreed to in principle. Several changes were made in the location of the proposed surface water sampling locations. Toxicity testing was added to the sampling. Five bedrock wells (with accompanying quarterly sampling) were replaced with four borings. The meeting was extremely productive as quality comments were received on the TM.

The TM #1 represents a reduction of scope which will equate to approximately a \$1 million savings in spite of the out of scope surface water sampling additions which were made to the OU 6 Work Plan.

OU 8 - 700 Area -- A comment review meeting was held on November 17, 1992, concerning RFO comments on the Work Plan and Responsiveness Summary. Attendees included RFO, and subcontractor representatives. Based on the results of the meeting, the Draft Final Work Plan is being modified and the OU 8 Final Phase I RFI/RI Work Plan will be completed on November 25, 1992 for delivery to EPA and CDH on December 1, 1992 to meet the extended IAG due date.

~~OU 13 - 100 Area~~ -- Progress was made at two meetings held the week ending November 13, 1992, on the settlement of the ARARs/Chemical Benchmark issues. Representatives from CDH, Colorado's Office of the Attorney General (CAG), RFO, EPA and EG&G were present. The status of the Benchmark tables were discussed in detail. Comments on the Work Plan indicate that the CAG's position is that the Benchmark tables will be used to establish the data quality objectives (DQO) analytic detection limit. EPA didn't agree at the meeting with the CAG's comments; comments from EPA on the Work Plan have not been received. Another meeting was held on November 13, 1992, with representatives from the subcontractor to discuss expectations regarding the updating of the Benchmark tables. A schedule and scope of work is being developed. The goal is to have a corrected table delivered to the agencies as soon as possible.

Community Relations -- A meeting of the RFP Technical Review Group (TRG) was held November 18, 1992, at the Westminster City Hall. The TRG is composed of individuals from the RF Monitoring Council, representatives from local municipalities, the Rocky Flats Cleanup Commission, Citizens Against Nuclear Disinformation, and Communities Uniting for Environmental Safety.

At the meeting the charter of the TRG was discussed and revised; the IAG schedule was discussed and IAG schedule extensions were noted. Comments from the TRG on the OU 1 RI Report were discussed. TRG comments will be assembled into one report and sent to EPA for incorporation with its comments.

Upcoming Public Meetings:

November 24 Colorado Council on Rocky Flats Public Meeting (previously the Rocky Flats Environmental Monitoring Council) 7:00 p.m., Westminster Council Chambers, 4800 W. 92nd Ave., Westminster, Colorado

December 8 Quarterly Environmental Restoration Public Information Meeting - Topic will include an overall ER update and specifics on OUs 1 and 16. 7:00-9:00 p.m. Denver Marriott West, 1717 Denver West-Marriott Blvd., Golden, Colorado

Section VI - Future

Near Term FY93 IAG Table VI Milestones Scheduled for Delivery from RFO to EPA/CDH:

<u>OU</u>		<u>Milestones</u>	<u>Date</u>
Due to EPA/CDH			
*08	Submit Final Phase I RFI/RI Work Plan	Dec 1, 1992	
01	Submit Final Phase III RFI/RI Report	Jan 2, 1993	

*extended from original IAG date of September 28, 1992, with approval from EPA/CDH.

IAG Amendment Meeting -- The next IAG amendment meeting with the regulatory agencies was delayed to the week of November 30, 1992.

FY93 Work Scope Presentation - Responses to OMB questions regarding the FY93 work scope and funding allocation will be made to HQ on November 23, 1992.