



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2405

FEB 28 1991

Ref: 8HWM-FF

Mr. Gary Baughman
Hazardous Waste Facilities
Colorado Department of Health
4210 East 11th Avenue
Denver, Colorado 80220

RE: Proposed PPCD Schedule
Extension

Dear Mr. Baughman:

We have reviewed the second request for extension on the Final PPCD (DOE Letter 1139, 21 Feb 1991). It appears the justification cited is not well founded, and the schedule extends well beyond the time that should be required; we would thus like to offer an alternative completion date.

The main problem we identified in the DOE request is the contention that the proposed schedule extension of three months is necessitated by regulatory requirements for additional work or modification to work. It is true that significant modifications to the PPCD format and content were requested in two recent staff-level meetings. However, as Mr. Simonson correctly notes, agreement on the required changes was reached at the second meeting, on 7 February 1991. DOE letter 0941 (8 Feb 1991) was then received, requesting an extension to 18 April 1991; we assumed this proposed delivery date was based on incorporation of the agreed-upon changes. As no subsequent contact has taken place between EPA and DOE relative to the PPCD, it is difficult for us to understand how the regulatory demands could have changed to an extent justifying a subsequent request for an additional three month delay, to 22 July 1991.

In light of these circumstances, it is our position that no further extension of the 18 April 1991 date is justified by the reasons cited. However, given that an interim plan is available for use, and the activities the PPCD is designed to address have largely been delayed until later in the year, we propose an extension be granted to 24 May 1991; such an extension could be adsorbed without unduly impacting other aspects of the program.

If you have questions or need to discuss preparation of a formal response to DOE, please contact Bill Fraser (294-1132).

Sincerely,



Martin Hestmark, EPA
Rocky Flats Team Leader

cc: Barbara Barry (CDH)
Scott Grace (DOE)
Tom Greengard (EG&G)
Frazer Lockhart (DOE)