



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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



Ref: 8HWM-FF

AUG 30 1991

Mr. Frazer Lockhart  
U.S. Department of Energy  
Rocky Flats Office  
P.O. Box 928  
Golden, CO 80402-0928

Re: Ecology Standard Operating  
Procedures

Dear Mr. Lockhart:

We have reviewed the revised Ecology Standard Operating Procedures (SOPs) which were transmitted to EPA on June 17, 1991. The SOPs are a component of the Sampling and Analysis Plan, an Interagency Agreement (IAG) primary document. We have also reviewed the July 7, 1991, responses to our comments on the draft SOPs. Our review focused on determining the adequacy of the response to the conditions of approval stipulated in our letter of March 29, 1991.

Generally the SOPs are adequate to direct field work largely as a result of the requirement in each SOP for an experienced individual in that field to lead the effort. However, the revised document still does not indicate how field personnel will be alerted to the possible existence of threatened, endangered, or other special status species on Rocky Flats, the protocols which will be implemented if any of these species are encountered, and the limitations on field activities which will be required to avoid harming them. Because satisfactory resolution of this item was specifically stipulated as a condition of approval, the Ecology SOPs cannot be approved.

In order to be considered as approved, the SOPs must incorporate the appropriate procedures for dealing with threatened and endangered species. These procedures need to be developed and transmitted to EPA and the Colorado Department of Health for approval. Our recommendation for the correct procedures is contained in the enclosed comments. In light of the numerous extensions allowed for the SOP documents and the need for these documents to support fieldwork and subsequent IAG deliverables, these required procedures must be submitted by September 9, 1991. Failure to meet this delivery date will be considered a failure to submit a primary document in accordance with the requirements of the IAG and may result in assessment of stipulated penalties against DOE pursuant to part 19, paragraph 129 of the IAG.

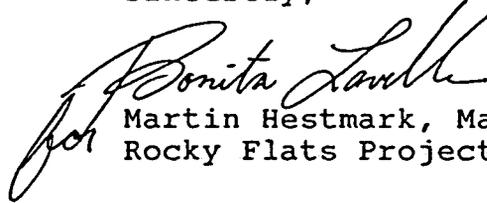
ADMIN RECORD

A-SW-000128

Our comments on additional items for consideration are also enclosed. While these comments are not conditions of approval, the majority of these comments result from failure to adequately address previous comments and should be seriously considered by DOE/EG&G. We expect these items to be addressed in future revisions of the SOPs and we reserve the right to request further SOP modifications based on the results of field oversight and field experience using these SOPs. As with the other SOPs, DOE/EG&G are in the best position to monitor the status of this document and the adequacy of the procedures described therein and must correct them as necessary through updates as expeditiously as possible. Compliance with an obsolete SOP (even if previously approved) will not justify an inadequate Remedial Investigation.

If you have any questions about our review comments, please contact Bonnie Lavelle at (303)294-1067.

Sincerely,



Martin Hestmark, Manager  
Rocky Flats Project

Enclosure

cc: Bruce Thatcher, DOE  
Larry Woods, EG&G  
Tom Greengard, EG&G  
Barbara Barry, CDH/RFP  
Gary Baughman, CDH  
Andrew Archuleta, USFWS