



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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

MAR 29 1991

APR 2 1991

Ref: 8HWM-FF

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

RE: Approval of Final SOPs/QAPjP

Dear Mr. Lockhart:

We have reviewed the subject documents as submitted on 01 March 1991. It is our conclusion that these documents represent a significant improvement over the previous version, and should be very useful in guiding the field teams during future remedial investigation activities. However, several outstanding items of concern remain, some of them as a result of failure to respond to previous comments. This letter thus constitutes only conditional approval of the documents enumerated in Attachment 1, formal approval remains contingent on satisfactory resolution of those items detailed in the Conditions of Approval. SOPs not impacted by the Conditions of Approval are hereby approved.

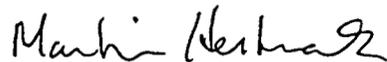
Sections of the QAPjP and specific SOPs requiring revision to address Attachment 1 items must be modified, resubmitted, and reviewed and approved by EPA before they are implemented. DOE must also give appropriate consideration to comments provided under separate cover by the Colorado Department of Health (CDH). EPA believes that the documents could be improved as a result of consideration of the State's comments. Revised SOPs should be accompanied by a specific response to each Condition of Approval, and keyed to indicate changes. This will facilitate review and allow EPA, as lead agency, to expeditiously determine the adequacy of the response and grant approval for SOP implementation. EPA anticipates that SOP revisions will be in a loose-leaf format so that the revisions may easily integrate into the approved portions.

It must be understood DOE bears the responsibility for ensuring compliance with SOPs, and the obligation to revise them as required and submit updated versions for EPA/CDH approval. Upon approval, replacement SOPs will be incorporated in a master set maintained by each agency. Attachment 2 contains a number of items for consideration when preparing updates. Other defects will no doubt be discovered in these documents as field work

proceeds. In addition, technological and regulatory changes may eventually necessitate additional SOP updates to keep current with accepted practice. DOE/EG&G are in the best position to monitor the status of these documents, and must correct them through updates as expeditiously as possible. Compliance with a faulty SOP (even if approved) will not justify an inadequate Remedial Investigation.

EPA is granting conditional approval of the SOPs and QAPjP, with the expectation that the conditions of approval can be resolved promptly. This conditional approval is not an extension of the timetable for submittal of the SOP and QAPjP, and shall not impact current IAG schedules nor constitute grounds for seeking additional extensions. If you have questions or would like to discuss the progress of this effort, please contact Bill Fraser (294-1132).

Sincerely,



Martin Hestmark, Manager
Rocky Flats Project

Attachments

cc: Barbara Barry (CDH)
Scott Grace (DOE)
Tom Greengard (EG&G)
Gary Baughman (CDH)