

RF 3440

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

June 14, 1991

91-RF-3440

Robert M. Nelson, Jr.
Manager
DOE, RFO

Attn: Frazer Lockhart

SUBMITTAL OF FINAL ENVIRONMENTAL MANAGEMENT (EM) STANDARD OPERATING PROCEDURES (SOPS) AS REQUIRED BY THE IAG - JMK-0205-91

Enclosed please find copies of changes recently incorporated into the Rocky Flats Plant Environmental Management Standard Operating Procedures (SOPs). The SOPs have been revised in response to EPA's Attachment 1 comments as agreed upon at the May 22, 1991 meeting with EPA and CDH. EG&G is submitting only the pages revised (as requested by EPA) in response to the direct comments along with complete copies of newly requested procedures. A comment and disposition record has also been included as part of the enclosure. It is our understanding that upon receipt of these copies, and subsequent EPA approval, field operations to meet the IAG schedule may begin. EPA and CDH stated that the Interim Plan for Prevention of Contaminant Dispersion will suffice for drilling and that completion of SOP 1.1 is not required prior to initiation of drilling activities.

A member of your staff recently indicated that in addition to the above stated documents, DOE/RFO is requiring all procedures including those not related to drilling nor EM also be completed, and approved, prior to initiation of any drilling activities. EG&G has followed the steps as outlined in the IAG schedule which calls for concurrent review between DOE and EG&G. This was accomplished and DOE/RFO draft comments were incorporated into the final volumes submitted in March. At no time were additional non-EM SOPs ever requested. DOE/RFO also submitted very general comments to the final SOPs, many of which actually belonged in individual work plans. These comments were verbally discussed and a letter response was sent May 6, 1991. Once DOE forwarded the SOPs to EPA, all DOE concerns had been addressed and only EPA concerns needed to be resolved with DOE/RFO approval. This was completed through additional EG&G and DOE meetings, as well as joint teleconferences with EPA and CDH. Resolution of the remaining sampling issue dealing with Volatile Organic Compounds (VOCs) was agreed to via a teleconference on May 29, 1991 with staff from DOE/RFO, EPA and CDH.

In order to meet the IAG schedule, EG&G plans to go forward with drilling activities once EPA approval of the attached SOPs is received and DOE's NEPA group issues a categorical exclusion for drilling. Additional review/comment time for DOE, HAZWRAP, or others is not part of the IAG schedule, and cannot be added and still meet the schedule which has already been jeopardized by other problems, such as procurement delays and new plant policies and procedures. Although we do not agree with their comment, EPA stated in their cover letter for SOP comments that revisions required to gain SOP approval is not justification for an extension of the IAG schedule and will not allow for delays due to these revisions.

Further SOP revisions not directly related to drilling activities are being completed in a phased approach. Volume 5 (Ecology) revisions have been completed and were forwarded to DOE on

DIST	
ATZRE, J.C.	
BLINGAME, A.H.	
BP, R.D.	
BUCHER, D.W.	
CHAS, J.G.	
CRID, J.E.	<input checked="" type="checkbox"/>
DEPERA, D.W.	
FRIS, L.R.	
GRIFFIN, F.J.	
HANCOCK, G.E.	
HODWIN, R.	
LYNCH, T.J.	
MCNEIL, F.H.	
MCNEIL, S.J.P.	
MCNEIL, P.B.	
MCNEIL, J.M.	
MCNEIL, W.A.	
MCNEIL, J.A.	
MCNEIL, E.M.	
MCNEIL, J.C.	
MCNEIL, T.A.	
MCNEIL, B.E.	
MCNEIL, R.V.	<input checked="" type="checkbox"/>
MCNEIL, P.	
MCNEIL, L.A.	
MCNEIL, G.L.	<input checked="" type="checkbox"/>
MCNEIL, V.M.	
MCNEIL, H.	
MCNEIL, R.E.	
MCNEIL, F.P.	
MCNEIL, J.S.	
MCNEIL, R.R.	
MCNEIL, R.E.	
MCNEIL, J.M.	
MCNEIL, E.R.	
MCNEIL, J.O.	

- Arndt
- Busby
- Fwan
- Langman
- Porter
- Smith
- Lindbergh

RES CONTROL

CLASSIFICATION:

SECRET	<input checked="" type="checkbox"/>
CONFIDENTIAL	<input checked="" type="checkbox"/>
CLASSIFIED	<input checked="" type="checkbox"/>
UNCLASSIFIED	<input type="checkbox"/>

UNCLASSIFIED CLASSIFIED SIGNATURE

[Signature]

REPLY TO: *[Signature]*

APPROVALS:

[Signature]

BY & TYPIST INITIALS

B/Csk

REVIEWED FOR CLASSIFICATION/UCM

By *[Signature]*

Date 7/10/91 *[Signature]*

R. M. Nelson, Jr.
June 14, 1991
91-RF-3440
Page 2

May 21, 1991. The groundwater calculation in SOP 2.1 and pond sampling in SOP 4.8 will be reevaluated this month. The Sampling of Bulk Wastes and Air Monitoring SOPs (including SOP 1.1) are being written and draft versions will be complete by July 31, 1991.

All SOPs are scheduled for a programmatic review at the end of current field activities. At that time, relevant additional comments presented by both EPA and CDH will be incorporated along with those dictated by EM deviations recorded during actual field activities.

A chart listing which SOPs have already been revised in response to EPA comments is enclosed. The chart also notes which additional SOPs will be revised in response to past noncritical comments. There will be two more SOP transmittals. Those remaining to be addressed from EPA's attachment 1 will be delivered at the end of July. SOPs revised as a consequence of the programmatic review will be forwarded upon completion.

If you have any questions, please contact Tom Greengard at extension 7121 or Mike Arndt at extension 4294.


J. M. Kersh, Associate General Manager
Environmental and Waste Management

MCB:csk

Orig. and 1 cc - R. M. Nelson, Jr.

Attachments:
As Stated

SOP COMMENTS

SOP	TITLE	EPA Attachment 1	Addressed	EPA Attachment 2	Will be Addressed	CDH Comments (Not required for OU activities)	Will be Addressed
1.1	Wind Blown Contaminant Control	**	yes			~	yes
1.2	Field Document Control					*	
1.3	Grnl. Equipment Decontamination	**		*	n/a	*	
1.4	Heavy Equipment Decontamination	**	yes	*	n/a	*	
1.5	Purge & Development Water	**	yes	*	n/a	~	n/a
1.6	Personal Protective Equipment						
1.7	Decontamination and Wash Waters	**	yes	*	n/a	~	ok/covered
1.8	Drilling Fluids and Cuttings	**	yes	*	n/a	~	ok/covered
1.9	Handling of Residual Samples	**	yes	*	ok/covered	~	ok/covered
1.10	Handling of Waste Containers	**	yes	*			
1.11	Field Communications						
1.12	Decontamination Facility Operations	**	yes			~	yes
1.13	Handling of Soil & Water Samples	**	yes			~	
1.14	Field Data Management	**	yes			~	n/a
1.15	Use of Ionizing Detectors	**	yes			*	
1.16	Field Radiological Measurements	**	yes	*	n/a	*	
1.XX	Sampling Bulk Waste	**	Draft 7/31				
2.1	Water Level Measurements	**	To be addressed	*	n/a	~	yes
2.2	Well Development	**		*	n/a	~	yes
2.3	Pump-In Borehole Packer Tests	**		*	n/a	*	
2.4	Slug Tests	**		*	n/a		
2.5	Measurement GW Field Parameters	**		*	n/a		
2.6	Groundwater Sampling	**		*	n/a	~	yes

KEY	Comment must be addressed	n/a	is currently incorporated
**	Comment must be addressed	n/a	is currently incorporated
*	Approved: Comment should be considered		or is not appropriate
~	Not Approved: Comment should be considered		for incorporation.

SOP COMMENTS

SOP	TITLE	EPA Attachment 1	Addressed	EPA Attachment 2	Will be Addressed	CDH Comments (Not required for OU activities)	Will be Addressed
3.1	Logging Alluvial & Bedrock Material	**	yes	*	yes	~	ok/covered
3.2	Drilling & Sampling/Hollow-Stem Auger			*	n/a	*	
3.3	Isolating Bdrk from Alluv with GSC	**	yes	*	n/a	~	
3.4	Rotary Drilling & Rock Coring	**	yes	*	n/a	*	ok/covered
3.5	Plugging & Abandonment of Boreholes	**	yes	*	n/a	~	
3.6	Monitoring well & Piezometer Installin	**	yes	*	n/a	*	
3.7	Logging Test Pits and Trenches			*	n/a	*	
3.8	Surface Soil Sampling			*	yes	~	Yes
3.9	Soil Gas Sampling & Field Analysis			*	ok/covered	*	
3.10	Borehole Clearing					~	n/a
3.11	Plugging & Abandonment of Wells	**	yes			*	
(New)3.15	Geophysical Borehole Logging	**	yes			*	
(New)3.17	Land Surveying	**	yes			*	
(New)3.18	Surface Geophysical Surveys	**	yes			*	
(New)3.19	Field Gas Chromatographs	**	yes			*	
4.1	Surface Water Data Collection Activities					*	
4.2	Field Measurements SW Field Parameters			*	n/a	*	
4.3	Surface Water Sampling					*	
4.4	Discharge Measurements					*	
4.5	Base Laboratory Work			*	n/a	*	
4.6	Sediment Sampling					*	
4.7	Collection of Tap Water Sampling					*	
4.8	Pond Sampling	**	To be addressed			*	
4.9	Indirect Effluent & Pond Discharge Smplg					*	

KEY	Comment must be addressed	n/a is currently incorporated or is not appropriate for incorporation.
**	Comment must be addressed	n/a is currently incorporated or is not appropriate for incorporation.
*	Approved: Comment should be considered	
~	Not Approved: Comment should be considered	

SOP COMMENTS

SOP	TITLE	EPA Attachment 1	Addressed	EPA Attachment 2	Will be Addressed	CDH Comments (Not required for OU activities)	Will be Addressed
5.1-5.13	All comments addressed and revisions submitted to DOE 8/30/01.						
6.1	Effluent Tritium Sample Collection	**	Deleted				
6.2	Tritium Sampler Calibration	**	Deleted				
6.3	Effluent Air Radioparticulate Sampling	**	Deleted				
6.4	Effluent Air Radioparticulate	**	Deleted				
6.5	Response to Effluent SAAM ALAR	**	Deleted				
6.6	Eff Air Pilot Tube Inspec & Replacement	**	Deleted				
6.7	Effluent Air Sample Data Reduction	**	Deleted				
6.8-6.11	EM Air Sampling Procedures	**	To be written				
6.12	Preventive Maint for RFP TSP HVOL						
KEY							
		**	Comment must be addressed		n/a is currently incorporated		
		*	Approved: Comment should be considered		or is not appropriate		
		-	Not Approved: Comment should be considered		for incorporation.		