

CORRES. CONTROL
INCOMING LTR NO.

2855RF 91

States Government

Department of Energy

Rocky Flats Office

DUE
DATE

Memorandum

SEP 6 3 34 PM '91

ACTION

DIST.	LTR	ENC
BENJAMIN, A.		
BRETZKE, J.C.		
BURLINGAME, A.H.		
COPP, R.D.		
CROUCHER, D.W.		
DAVIS, J.G.		
EVERED, J.E.	X	X
FERRERA, D.W.		
FERRIS, L.B.		
FRAIKOR, F.J.		
FRANCIS, G.E.		
GOODWIN, R.		
HANNI, B.J.		
HEALY, T.J.		
IDEKER, E.H.		
JENS, J.P.		
KERSH, J.M.	X	X
KIRBY, W.A.		
KRIEG, D.		
KUESTER, A.W.		
LEE, E.M.		
MAJESTIC, J.R.		
MARX, G.E.		
MATHEWS, T.A.		
MEURRENS, B.E.		
MORGAN, R.V.		
PIZZUTO, V.M.		
POTTER, G.L.		
SAFFELL, B.F.		
SANDLIN, N.B.		
SWANSON, E.R.		
WIEBE, J.S.		
WILKINSON, R.B.		
WILSON, J.M.		
YOUNG, E.R.		
ZANE, J.O.		

SEP 05 1991

EG&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

ERD:BKT:7371

Standard Operating Procedures (SOPs)

J. M. Kersh, Associate General Manager
Environmental Restoration and Waste Management
EG&G Rocky Flats, Inc.

Please find attached a letter dated August 30, 1991, from Martin Hestmark (EPA Region VIII) to Frazer Lockhart (DOE) regarding the Ecology Standard Operating Procedures (SOPs) at the RFP. Of special interest in the letter is EPA's comment regarding threatened, endangered and special status species which was previously located in their March 29, 1991 SOP comments submitted to DOE. The EPA has requested that the SOPs be modified per this comment and delivered to them and CDH by September 9, 1991. Otherwise, they will consider it "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 in pursuant to part 19, paragraph 129 of the IAG."

It is of interest that the USFWS which is responsible for threatened and endangered species under the Endangered Species Act has not made an issue of this in their comments on the Ecology SOPs. The Colorado Division of Wildlife also commented on the Ecology SOPs and did not make an issue of our treatment of threatened and endangered species. Both the USFWS (of the U.S. Department of the Interior) and the Colorado Division of Wildlife (of the Colorado Department of Natural Resources) are natural resource trustees for biological resources at the RFP. Furthermore, the USFWS has statutory authority for enforcing the Endangered Species Act.

We request that you modify the existing Ecology SOPs such that EPA's comment on threatened, endangered and special status species is satisfied. This can most likely be accomplished by providing inserts that can replace existing pages or that can be added to the document. Due to the short time given to perform this task, we request that modifications be submitted to DOE/EM/ERD for review by September 6, 1991, along with a draft submittal letter to EPA and CDH. Also, you should plan to deliver the documents to EPA and CDH on September 9, 1991.

In addition, note that there are several general comments which will need to be responded to and incorporated in the SOPs. These comments do not need to be addressed immediately. However, we request that they be responded to in writing no later than October 1, 1991 and incorporated into the next revision of the SOPs.

Quinn RCT
Wood L X X

CORRES CONTROL x x
TRAFFIC

Reviewed for Addressee
Corres. Control RFP
9-6-91 *C*

DATE BY

Ref Ltr. #

J. M. Kersh

2

Should you have any questions or concerns, please contact Bruce Thatcher of my staff at extension 3532.


David P. Simonson
Assistant Manager
for Environmental Management

Attachment

cc w/o Attachment:
F. Lockhart, DOE/RFO
R. Schassburger, DOE/RFO
B. Thatcher, DOE/RFO
L. Woods, EG&G/RF