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States Government

Department of Energy

DUE DATE 7-17-92

# Memorandum

JUN 15 2 36 PM '92

Rocky Flats Office

ACTION *Kersh*  
DIST LTR ENC

|                   |                                     |
|-------------------|-------------------------------------|
| BENJAMIN, A.      |                                     |
| BERMAN, H.S.      |                                     |
| BRADY, J.A.       |                                     |
| BRANCH, D.B.      |                                     |
| CARNIVAL, G.J.    |                                     |
| COPP, R.D.        |                                     |
| CORDOVA, R.C.     |                                     |
| DAVIS, J.G.       |                                     |
| EVERED, J.E.      | <input checked="" type="checkbox"/> |
| FERRERA, D.W.     |                                     |
| GOODWIN, R.       |                                     |
| HANNI, B.J.       |                                     |
| HEALY, T.J.       |                                     |
| HILBIG, J.G.      |                                     |
| IDEKER, E.H.      |                                     |
| KERSH, J.M.       | <input checked="" type="checkbox"/> |
| KIRBY, W.A.       |                                     |
| KRIEG, D.         |                                     |
| KUESTER, A.W.     |                                     |
| LEE, E.M.         |                                     |
| MARX, G.E.        |                                     |
| MORGAN, R.V.      |                                     |
| PIZZUTO, V.M.     |                                     |
| POTTER, G.L.      |                                     |
| SANDLIN, N.B.     |                                     |
| SATTERWHITE, D.G. |                                     |
| SCHUBERT, A.L.    |                                     |
| SHEPLER, R.L.     |                                     |
| SULLIVAN, M.T.    |                                     |
| SWANSON, E.R.     | <input checked="" type="checkbox"/> |
| TALLMAN, K.G.     |                                     |
| WILKINSON, R.B.   |                                     |
| WILSON, J.M.      |                                     |
| ZANE, J.O.        |                                     |

JUN 15 1992

ERD:BKT:6628

Final Phase I RFI/RI Work Plan for Operable Unit No. 9

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

BEST AVAILABLE COPY

Please find attached a May 15, 1992 memorandum from EM-453 to DOE/RFO, regarding the Final Phase I RFI/RI Work Plan for OU 9. Note that this memorandum is being brought to your attention with regard to all 16 OUs at the RFP. EM-453 is concerned, and DOE/RFO shares the concern, that RFP OU Work Plans under the IAG do not incorporate the sampling efforts of other OUs. The result of this lack of integration may lead to the collection of redundant data which translates to unnecessary or avoidable costs.

A related issue includes environmental monitoring data which are generated at the RFP for compliance with the RCRA, Clean Water Act, Clean Air Act, DOE Order 5400.1, etc. To the degree possible, we encourage you to integrate these data with that collected under the IAG in order to avoid the collection of redundant data.

We request that you make your environmental staff aware of this potential problem and that steps be taken to minimize the possibility of the collection of redundant data for environmental activities at the RFP. As stated in the Attachment, this concern should be addressed at the Program Management level. We further request that EG&G respond to this memorandum in writing by July 17, 1992 regarding actions taken to ensure the integration of RFI/RI data and other environmental sampling data.

|               |          |                                     |
|---------------|----------|-------------------------------------|
| <i>Hobbs</i>  | <i>F</i> | <input checked="" type="checkbox"/> |
| <i>Coe</i>    | <i>C</i> | <input checked="" type="checkbox"/> |
| <i>Ogg</i>    | <i>R</i> | <input checked="" type="checkbox"/> |
| <i>Meyers</i> |          | <input checked="" type="checkbox"/> |
| <i>Hinds</i>  |          | <input checked="" type="checkbox"/> |

*James K. Hartman*  
James K. Hartman  
Assistant Manager  
for Environmental Management

|                |                                     |                                     |
|----------------|-------------------------------------|-------------------------------------|
| CORRES CONTROL | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| TRAFFIC        |                                     |                                     |

Attachment

Reviewed for Addressee  
Corres. Control RFP

7-16-92 *Cie*

DATE BY

Ref Ltr. #

ADMIN RECORD

ADMIN RECORD

JUN 15 1992

cc w/Attachment:

A. Rampertaap, EM-453  
F. Lockhart, ERD, RFO  
R. Schassburger, ERD, RFO  
T. Lukow, WMED, RFO  
M. Van Der Puy, EMB, RFO  
B. Birk, ERD, RFO  
S. Grace, ERD, RFO  
J. Pepe, ERD, RFO  
S. Surovchak, ERD, RFO  
B. Thatcher, ERD, RFO  
E. Evered, EG&G  
F. Hobbs, EG&G  
C. Gee, EG&G  
R. Ogg, EG&G

# memorandum

RECEIVED  
GENERAL  
ADMINISTRATIVE ROOM

1992 MAY 18 A 7 47

DATE: MAY 13 1992  
REPLY TO: EM-453 (A. Rampertaap, 3-8191)  
ATTN OF:

SUBJECT: Rocky Flat Responses to Regulator and Department of Energy Comments on the Final Phase I Resource Conservation and Recovery Act Facility Investigation/Remedial Investigation Work Plan for Operable Unit 9

TO: Frazer Lockhart, Rocky Flats Office

The Office of Southwestern Area Programs, Rocky Flats/Albuquerque Production Division (EM-453) has analyzed the responses by Rocky Flats (RF) to comments made by Environmental Protection Agency, Colorado Department of Health and Department of Energy (DOE) on the subject document. Generally, we are concerned about the lack of integration in sampling efforts for Operable Unit (OU) 9 (Original Process Waste Lines) with other OUs, as indicated by RF responses. In responsibly managing its Environmental Restoration program, DOE should minimize duplicative sampling efforts.

In addition, we note from RF's responses that the Environmental Evaluation (EE) for OU 9 may be completely rewritten. Given that RF's response to many comments on the original EE was that insufficient time prevented incorporating those comments, this rewrite may be the opportunity to address these points. EM-453 would like to review the EE Work Plan for the concerns expressed in this analysis before it is sent to the regulators.

If you have any questions regarding this analysis, please contact me at FTS 301-903-8191.

*Autar Rampertaap*

Autar Rampertaap  
Rocky Flats/Albuquerque Production Division  
Office of Southwestern Area Programs  
Environmental Restoration

Attachment

cc w/o attachment:  
R. Greenberg, EM-453  
J. Hartman, RF  
B. Magee, HAZWRAP

7695

mtls  
30-2

ROCKY FLATS/ALBUQUERQUE PRODUCTION DIVISION REVIEW OF  
ROCKY FLATS' RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY, COLORADO  
DEPARTMENT OF HEALTH, AND DEPARTMENT OF ENERGY COMMENTS ON  
THE FINAL PHASE IRCRA FACILITY INVESTIGATION/REMEDIAL INVESTIGATION WORK PLAN FOR  
OPERABLE UNIT NO. 9 (ORIGINAL PROCESS WASTE LINES) ROCKY FLATS PLANT

GENERAL COMMENTS:

1. A concern expressed repeatedly on Rocky Flats Plant (RFP) Operable Units (OUs) Work Plans is that the plans do not incorporate the sampling efforts of other OUs. In this review a comment is made in this area (specific comment 9, page (p.) 26). The response to this comment was "The OU-9 Field Sampling Plan (FSP) is consistent with the current approach of preparing FSPs independently for RFP OUs without considering integrations with other OUs." This statement verifies that the management philosophy is not to integrate the sampling plans of the operable units. Failure to integrate the sampling plans will result in the collection of redundant data. The lack of an integrated sampling plan also suggests that data will not be shared between the various operable units, potentially resulting in additional investigations that are unnecessary. Because of the relatively small size of the RF area, and the fact that most of the sixteen operable units overlap geographically, an integrated approach is a necessity to control costs. This concern should be addressed at the Program Management level, as individual authors should not modify the management approach without guidance to do so.