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States Government

Department of Energy  
Rocky Flats Office

DUE  
DATE 6-3-94

# Memorandum

MAY 4 1994

ADMIN RECORD

ACTION	STIGER	LTR	ENC
BERMAN, H.S.			
CARNIVAL, G.J.			
COPP, R.D.			
CORDOVA, R.C.			
DAVIS, J.G.			
FERRERA, D.W.			
FRANZ, W.A.			
HANNI, B.J.			
HEALY, T.J.			
HEDAHL, T.G.			
HILBIG, J.G.			
HUTCHINS, N.M.			
KELL, R.E.			
KIRBY, W.A.			
KUESTER, A.W.			
MAHAFFEY, J.W.			
MANN, H.P.			
MARX, G.E.			
McKENNA, F.G.			
MORGAN, R.V.			
PIZZUTO, V.M.			
POTTER, G.L.			
SANDLIN, N.B.			
SATTERWHITE, D.G.			
SCHUBERT, A.L.			
SETLOCK, G.H.			
STIGER, S.G.	X		
SULLIVAN, M.T.			
SWANSON, E.R.			
WILKINSON, R.B.			
WILSON, J.M.			
Lowdry, C.	X		
Peterman, B.	X		
Busby, W.	X		

ER:SS:04817

Technical Memorandum Operable Unit 9

Sue Stiger, Associate General Manager  
Environmental Restoration Management  
EG&G Rocky Flats, Inc.



Please find attached Colorado Department of Health's (CDH) comments on Technical Memorandum (TM) No. 1, Addendum to Phase I RCRA Facility Investigation/Remedial Investigation Work Plan, Field Sampling Plan, Vol. 1, Part A - Outside Tanks. Note that CDH approved the TM with the understanding that the comments be informally resolved by the respective staffs. We have not yet received comments from Environmental Protection Agency (EPA).

We request that EG&G review CDH's comments and begin preparation of appropriate responses in a letter addenda to the TM. Your work should be in preliminary form at this time. The responses can be finalized after EPA comments are obtained.

The CDH requested that the tanks currently in use as plenum deluge and secondary containment be included in the investigation (General Comment 1). We will provide guidance on this issue shortly. The CDH also requested that valve vaults be included at this time (General comment 2). Please determine how many valve vaults may be involved. However, our position is that valve vaults associated with pipelines should be investigated as part of the pipeline investigation. Activities associated with the pipeline investigation are very likely to cause potential residual fluids in the pipelines to be released in the associated valve vaults.

A schedule for response to comments and the letter addenda will be established after EPA comments are obtained.

A meeting will be scheduled with both EPA and CDH as soon as possible to discuss comments and resolve any differences in regulatory agency approach if necessary.

Questions or concerns regarding this memorandum and the attached comments should be addressed to Steve Slaten of my staff at extension 4839.

*Jessie Roberson*  
Jessie Roberson  
Acting Assistant Manager for  
Environmental Restoration

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CORRES CONTROL	x	x
CORD/880	X	2
ATS/T130G	X	

Reviewed for Addressee  
Corres. Control RFP

5/6/94 cm  
DATE BY

Ref Ltr. #

Attachment

COE ORDER # 54001

S. Stiger  
ER:SS:04817

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MAY 4 1994

cc w/o Attachment:  
F. Lockhart, ERMD, RFFO  
S. Slaten, ER, RFFO  
J. Burd, ER, RFFO  
T. McLeod, ER, RFFO  
C. Cowdry, EG&G  
B. Peterman, EG&G