



APR -3 1989

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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

Ref: 8HWM-RI

Albert E. Whiteman, Area Manager  
U.S. Department of Energy  
Albuquerque Operations  
Rocky Flats Area Office  
P.O. Box 928  
Golden, Colorado 80402-0928

Dominic Sanchini, President  
Rockwell International Corporation  
North American Aerospace Operations  
Rocky Flats Plant  
P.O. Box 464  
Golden, Colorado 80402-0464

REFER TO	
_____	Area Mgr
_____	Dep Area Mgr
_____	Counsel
_____	CH Admin Br
_____	CH FM Br
_____	CH Opr Br
_____	CH QA Br
_____	CH S&EC Br
✓ _____	CH S&E <sup>2</sup> Br
_____	CH S&S Br
_____	Proj. Mgr. PRMP
_____	Duane Catlett

1989 APR -5 A 8 12  
RECEIVED  
U.S.D.O.E.  
R.F.A.O.

RE: Potential Interim  
Response Action for  
High Priority Area -  
Hillside 881

Gentlemen:

As you know, on February 27, 1989, representatives from the Department of Energy (DOE), Rockwell International (Rockwell), the Colorado Department of Health (CDH), and EPA met to discuss responses and schedules for the 881 Hillside High Priority Remedial Investigation and Feasibility Study (RI/FS) at Rocky Flats.

Both EPA and CDH were encouraged that DOE and Rockwell indicated a desire to move forward with an environmental remedy for this area which would include source removal, ground water remediation for organics, metals and radionuclides, ground water restoration to minimize impacts on potential wetlands in the area, and reduction of potential risk to public health and the environment. However, EPA and CDH were concerned with information presented which indicated that final RI/FS documents and remedial actions would be significantly delayed. We realize that this is due, in part, to DOE's and Rockwell's desire to adequately respond to the August 31, 1988 comments regarding Hillside 881 area.

ADMIN RECORD

A-DU01-000111

EPA and CDH are also concerned that lengthy approval processes could impede the implementation of an Interim Response Action (IRA) at the 881 Hillside.

During the February 27th meeting, it was agreed that DOE and Rockwell should submit a proposal for an IRA at the Hillside 881 area. DOE and Rockwell staff requested guidance on what should be included in such a submittal. Enclosed is a summary of information which should be included in the submittal. The main purpose of the submittal is to define the technical aspects of the proposed IRA in relationship to the environmental situation at Hillside 881.

Attached to the enclosure is a portion of a guidance document which is a good general reference for evaluating non-time critical clean up activities. Since the action described by DOE and Rockwell is complex and could have substantial impact on the long term remedial action for this area, EPA emphasizes that this action is remedial in nature and not a removal action. EPA will work with your staffs to review the submittal and to obtain copies of any future guidance documents EPA may publish with regard to such IRA's. This assistance will be provided as required by the July 31, 1986 Compliance Agreement (see 12.1.(4)).

Since there has been no formal submittal to EPA and/or CDH, which defines the interim action which DOE and Rockwell plan to initiate, it is unlikely that EPA and/or CDH could presently approve, or allow, any interim action. EPA has prior approval authority for any action which may impact the long term remedy (see section 122 (e) (6) of SARA). CDH and EPA have a direct role in approval of such an action under the July 31, 1986 Compliance Agreement (see 10.c., e. & g.).

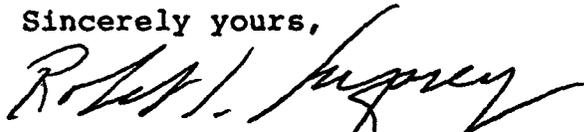
There have been many discussions regarding a potential interim action at the Hillside 881 area between our respective technical staffs and with the public over the last few months. Again, EPA and CDH are encouraged by statements and presentations made by DOE and Rockwell officials regarding the matter. EPA and CDH prior approval and a formal action regarding the matter is required. One option is to adopt the IRA as part of the 1986 Compliance Agreement. The preferred option would be either a separate, enforceable order relating to this area or incorporation into a new Site-wide Federal Facilities Compliance Agreement pursuant to section 120 of CERCLA. It is possible that several iterations of reviews and comments on the submittal may be needed.

In order to promote this action and support initiation, EPA and CDH are requiring that the technical proposal be submitted no later than April 24, 1989.

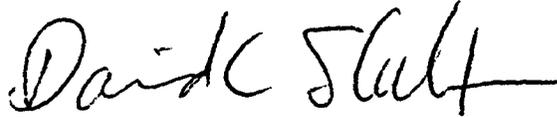
In addition, EPA and CDH would like to finalize plans for our staffs to conduct a working session meeting to discuss DOE's and Rockwell's response to the August 31, 1988 comments on the 881 draft RI/FS reports. We have made arrangements with CDH to hold the meeting in room 150 at the Colorado Health Department on April 19, 1989, at 9:30 am. EPA contractors will attend this meeting to discuss specific RI/FS concerns.

If you should have any questions regarding this matter, please contact Nathaniel Miullo at (303) 293-1668 or Patricia Corbetta at (303) 331-4843.

Sincerely yours,



Robert L. Duprey, Director  
Hazardous Waste Management Division



David C. Shelton, Director  
Hazardous Materials and Waste  
Management Division

ENCLOSURE

cc: Patricia Corbetta, CDH	(w/ encl.)
Jim Wilson, RFEMC	"
Candice Jierree, DOE	"
Kirk McKinley, RI	"
Sally Bilodeau, Jacobs	"
Jerry Portelle, Tetra Tech	"

# TECHNICAL PROPOSAL FOR INTERIM RESPONSE ACTION

HILLSIDE 881  
ROCKY FLATS PLANT, U.S. DOE

## General Information Requirements

The Interim Response Action (IRA) which DOE and Rockwell International (Rockwell) desire to implement for the high priority Hillside 881 area is an interim remedial action which will have direct impact upon any final remedy approved by EPA and CDH. EPA does not have specific guidance for this type of activity at this time. While the IRA is clearly not a removal action, in general, the information requirements for a proposal on this action should meet the requirements of an Engineering Evaluation/Cost Assessment (EE/CA) for a non-time-critical removal action under EPA's Emergency Response Removal Action program. (see selected portions of draft guidance attached). The technical requirements found in this document should be followed, while the administrative requirements (such as the EE/CA Approval Memorandum and Action Memorandum) are EPA internal procedures to be followed by EPA On Scene Coordinators and Regional Project Managers in non-time-critical removal actions. Such administrative requirements need not be adhered to for the purposes of DOE's and Rockwell's technical proposal. Much of the document which deals with EPA's internal administrative procedures has not been included in the attachment. The approval, enforcement and implementation aspects of the IRA will be dealt with through an Inter Agency Agreement (IAG), Federal Facilities Compliance Agreement (FFCA) or compliance order.

The main purpose of DOE's and Rockwell's technical submittal, is for EPA and CDH to obtain an understanding and appreciation of the specific design characteristics and planned activities of the various IRA components. In reviewing the attached document, it will be noted that much of the information requirements are redundant to the 881 RI/FS documents already submitted by DOE and Rockwell. In fact, the EE/CA process is like a mini-RI/FS-ROD-RD-RA for CERCLA and/or RFI/CMS-CAD-CA for RCRA. The final RI/FS-RFI/CMS procedure will lead to a Record of Decision (ROD/CERCLA) and/or Corrective Action Determination (CAD/RCRA) which will take into consideration much more detailed information, such as biota and wildlife impact studies, background studies, ARARs, etc..

In order to support adequate comprehension of the document(s), the proposal should be as "stand alone" as possible. Where references are included for, or from, other support documents, some form of narrative description should be included in order to facilitate adequate and appropriate understanding of the intent of the information provided.

### Site Description and Background

A general summary, following the EE/CA information outline, of the Site and references to other documents, such as pertinent sections of the draft RI/FS reports, is adequate.

### Analytical Data

A description and brief summary of pertinent data which meets the criteria in 2.1.3. of the attached EE/CA document, along with a brief evaluation of data results, and a reference to where the details of data exist within the various RI/FS and ground water monitoring reports is adequate. Rockwell and DOE should avoid references to data which is questionable, or inconclusive, based on comments previously provided by CDH and EPA.

### Site Conditions Which Justify an Action

Each of the factors (i) through (vii) of the attached EE/CA guidance document should be considered and briefly addressed. Reference to specifically pertinent and definitive data in the RI/FS or CEARP documents can be made.

### Identification of Interim Action General and Specific Objectives

Rockwell and DOE should disregard references to statutory cost limitations for removal actions since this activity will be considered an interim remedial action and not a removal action. The description of defining the who, what and, when (i.e. scope) of the action is more appropriate for this section.

### Action Schedules

Comprehensive and detailed activity schedules should be presented. Schedules shall include, to the extent practicable, any review and approval periods related to the activity as well as planned periods of operation, maintenance, decontamination, etc.. A reasonable attempt at identifying potential administrative and/or legal actions which would precipitate delay shall be made. The schedules are important and using the general informational considerations presented in 2.2.3 of the attached guidance, with careful consideration to internal and regulatory agency

administrative reviews, will assure a reasonable accounting for timing concerns.

### Applicable or Relevant and Appropriate Requirements (ARARs)

The information contained in 2.2.4 of the attached guidance document serves as a general outline for consideration. Presently, EPA and CDH expect all ARARs can be met for this action. Therefore, DOE and Rockwell should make every effort to identify activities and standards required to meet ARARs (the 881 RI/FS already attempts this). To the extent that standards or requirements appear to conflict, the stricter standards will apply unless EPA and CDH determine otherwise.

### Interim Response (Removal) Action Alternatives

Some work has already been completed in the 881 RI/FS with regard to this matter and can be referenced, where EPA and CDH have not taken exception through comments and DOE and Rockwell have not resolved the issue through the February 27, 1989 RI/FS response submittal. The screening process in the attached guidance document is lengthy, however DOE and Rockwell should use it as a measure of the alternatives evaluations. A similar process will be required to satisfy the NEPA Environmental Assessment procedure which DOE insists must be completed for this activity.

The final remedy for Hillside 881 will need to be subjected to a detailed alternatives evaluation to demonstrate a competent and complete consideration of several factors in choosing a remedy.

### Cost Analysis

The cost analysis is a major factor for DOE's and Rockwell's consideration, specifically tied to the alternatives evaluation. Presently, cost considerations have more significance under a CERCLA remedial action process (to the extent that equal protection of the environment and public health are assured), than under a RCRA corrective action process. EPA is reviewing the RCRA process to determine if cost should be considered as a major concern under RCRA corrective actions. The burden of a comprehensive alternatives evaluation, for this IRA and the long term remedy, is on DOE and Rockwell. For this IRA proposal, EPA and CDH will be more concerned with a technically effective and comprehensive IRA which will adequately address the concerns at Hillside 881 and not interfere with long term remedies and corrective actions at the area.

Attachments