



integration of this interim action into the final remedy at OU 1.

Treatment system design plans were not included in the implementation plan and specific bench-scale and pilot testing plans or results were not provided. EPA requests that all pilot information be submitted for review as soon as the information becomes available. Review of the treatment system operating parameters is also requested to determine the potential effectiveness of the system in meeting the treatment requirements.

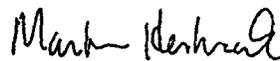
The substantive requirements of RCRA, as identified in Table 3-3 of the IM/IRA Decision Document must be met for the IM/IRA to the extent practicable. These requirements are outlined in the Decision Document but were not addressed in the implementation plan. Since EPA, after consultation with the State of Colorado, is responsible for determining which ARARs are to be applied, DOE needs to obtain EPA approval if DOE does not intend to meet any ARAR.

During the April meeting, it was mentioned that DOE perceived NEPA requirements may be invoked due to disturbance of the south interception ditch during the french drain construction. EPA restates the position that any NEPA activities undertaken at the plant are not to interfere with the IAG activities and schedules.

Earth moving activities during construction of the french drain can result in dust resuspension and a potential health hazard. Therefore, EPA recommends that DOE follow procedures outlined within the IM/IRA Decision Document and Interim Plan for the Prevention of Contaminant Dispersion.

It is apparent that additional plans must be made to specify the field engineering procedures to be followed by the contractor while constructing the french drain. These plans should be forwarded to EPA and the State for review and should identify field procedures necessary to accomplish the stated objectives of the IM/IRA. Please contact Patricia Corbetta at (303) 294-1135 if you should have questions regarding these issues.

Sincerely,



Martin Hestmark, Manager  
Rocky Flats Project

Enclosure

cc Patricia Corbetta, 8HWM-FF  
Gary Baughman, CDH  
Noreen Matsuura, CDH