



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

2000 64/83
- JAN 96
10
9

Ref: 8HWM-FF

DEC 19 1995

Mr. Steven Slaten
Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, CO 80402-0928

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

Re: OU 1 Proposed Plan

Dear Mr. Slaten:

EPA has reviewed the Operable Unit (OU) 1 Proposed Plan (PP) that DOE submitted on November 22, 1995. Due to the ongoing discussions and negotiations regarding sitewide strategies for remediation of Rocky Flats our comments on this document have been delayed. As you are well aware, the Dispute Resolution Committee (DRC) chose soil excavation as its preferred remedial action for OU 1. It is EPA's desire to develop a proposed plan that will accurately integrate this remedy for OU 1 with the developing sitewide strategies. Many agreements have been reached by all parties that will help guide the design of the OU 1 action, but there are still a few areas that need resolution. As such, we offer the following comments for revisions to this proposed plan but recommend that it not be finalized until after the January work out session.

General Comments

1) The Evaluation of Alternatives portion of this document needs the most revision. The CMS/FS is cited as the basis for the summary presented in the proposed plan, but this is not exactly correct since the DRC chose the preferred alternative and used somewhat different information and criteria in their decision. This needs to be reflected in the proposed plan as accurately as possible. This section should be written so that one would conclude that the preferred alternative (#5) is the best choice considering the nine criteria. As written this is not obvious.

2) Too much emphasis is given to site disturbance which is then translated to environmental impacts. At the same time, it is forgotten that installation of the french drain caused greater disturbance than any of the proposed alternatives would cause. This aspect needs to be accorded its proper weight in the evaluation. The risk to the public from potential contaminated dust is also overplayed in this summary.

5400
12528

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE



Printed on Recycled Paper

Other specific comments can be addressed in our meeting tomorrow which is scheduled for 1:00 in the Montana Room on the 6th floor at EPA. If you have any comments or questions, please contact Gary Kleeman at 294-1071.

Sincerely,



for Tim Rehder, Manager
Rocky Flats Project

cc: Dave George, DOE
Chris Gibreath, CDPHE
Joe Schieffelin, CDPHE