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States Government

Department of Energy

DUE
DATE

JUN 22 3 48 PM 1993 Rocky Flats Office

Memorandum

JUN 17 1993

EG&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

ERD:SG:06419

Operable Unit 2 Surface Water Interim Measure/Interim Remedial Action Reports

Bob
Robert Benedetti, Associate General Manager
Environmental Restoration Management
EG&G Rocky Flats, Inc.

This memorandum is in response to your May 21, 1993 letter (93-RF-5909). Your memorandum starts by discussing "...the missed milestone for the ... IM/IRA Field Treatability Unit draft report due May 18, 1993..." EPA/CDH verbally approved the extension request April 29, 1993 and formally approved the request for extension on May 20, 1993. The verbal approval was passed on to your staff April 30, 1993. Although it would have been better to receive formal approval from EPA/CDH prior to the milestone date, we cannot always control when EPA/CDH will formally respond to us.

Also in your letter you make the statement that "... S.R. Grace ... directed ... EG&G to change direction on the OU2 Surface Water IM/IRA Field Treatability Unit Report. EG&G stopped work on the draft as scoped and proceeded to work in the new direction defined by S. R. Grace..." The "new direction" given on the treatability report amounts to: (1) graphing data for constituents above ARAR at the sources, (2) requesting the data be placed in a spreadsheet, for ease of data review, (3) assessment of risk abatement of continued operations, and (4) a more complete evaluation of the data collected at various points in the process stream. This was **not** "new direction," but rather comments on the first working version of the report delivered the week of April 16, 1993. This version of the report repeated the inaccurate review and interpretation of site data that was in the Phase I treatability reports. The Phase I reports indicated the average concentration of plutonium at SW-61 as 0.6 pCi/l when in fact the concentration was below the 0.05 pCi/l ARAR. Comments delivered in the April 30, 1993, meeting with your staff was not "new direction," but rather an attempt to make the Phase II report accurate and acceptable, unlike the Phase I reports.

The attached copy of the March 30, 1992, DOE transmittal letter (92-DOE-3408) for the draft Phase I treatability report to EPA/CDH contained the following comment, which the EPA concurred with, as stated in their May 4, 1992 letter:

The document should also include discussion of quantity and quality from the collection sources, SW-59 and SW-61. Because of the overall low concentrations of contaminants, it may be possible to determine that concentrations exceeding the ARAR are from SW-59 rather than SW-61 (or

ACTION	DIST.	LTR	ENC
BENEDETTI, R.L.	X	X	
BENJAMIN, A.			
BERMAN, H.S.			
CARNIVAL, G.J.			
COPP, R.D.			
CORDOVA, R.C.			
DAVIS, J.G.			
FERRERA, D.W.			
HANNI, B.J.			
HEALY, T.J.			
HEDAHL, T.G.			
HILBIG, J.G.			
KIRBY, W.A.			
KUESTER, A.W.			
LEE, E.M.			
MANN, H.P.			
MARX, G.E.			
McKENNA, F.G.			
MORGAN, R.V.			
PIZZUTO, V.M.			
POTTER, G.L.			
RILEY, J.H.			
SANDLIN, N.B.			
SATTERWHITE, D.G.			
SCHUBERT, A.L.			
SETLOCK, G.H.			
SHEPLER, R.L.			
SULLIVAN, M.T.			
SWANSON, E.R.			
WILKINSON, R.B.			
WILSON, J.M.			
ZANE, J.O.			

Busby W X X
Primrose A X X
Hutchins N X X
Greengard T X X
Schneider F X X
Taylor K X X

CORRES CONTROL	x	x
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Reviewed for Addressee
Corres. Control RFP

6-22-93 *Cic*
DATE BY

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ADMIN RECORD

JUN 17 1993

R. Benedetti
ERD:SRG:06419

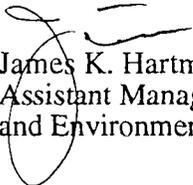
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SW-132). If so, this document should recommend collection from SW-59 only, in order to conduct meaningful treatability testing of the GAC and the metals/Radionuclide Removal System (RRS), when operational in April 1992. Otherwise, and in particular, the low concentrations of radionuclides will make testing inconclusive.

We reiterate the need to evaluate the sources collected. The cost savings for presenting a good case to the EPA and CDH for discontinuation of collection of SW-61 and SW-132 would be a significant portion of the \$750,000 annual operational costs of the IM/IRA (SW-59 water amounts to less than 5 percent of the collected water for the IM/IRA).

My staff takes exception to your assertion that the "scope" of the Phase II treatability report was changed and that "new direction" was given in the April 30 meeting. You are reminded that Work Package Number 12022, "OU2 Remediation IRA" Scope - Completion Criteria for the Treatability Report reads "Report accepted by EG&G, DOE, and the Regulatory Agencies." The report, without accurate evaluation of data and evaluation of continued operation will be unacceptable to DOE. In the future, we expect that the Operable Unit 2 Project Manager/Cost Account Manager be the point of contact for all matters concerning OU2, including the IM/IRAs.

Only the Contracting Officer and/or the Contracting Officer's Representative (DOE Assistant Managers) are authorized to redirect contract effort and/or shift work emphasis between work areas or tasks. If EG&G personnel actually thought new direction and/or scope changes were being given by unauthorized means, they should have been immediately brought to my attention for resolution or clarification. I believe a quick phone call could have eliminated the confusion, kept us both in compliance with the contract, and saved unnecessary correspondence. If you have any questions, please give me a call at extension 5918.


James K. Hartman
Assistant Manager for Transition
and Environmental Restoration

Attachment

cc w/ attachment:
A. Rampertaap, EM-453
M. Bishop, AMFAS, RFO
W. Busby, EG&G
A. Primrose, EG&G
N. Hutchins, EG&G
T. Greengard, EG&G