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# STATE OF COLORADO

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*Dedicated to protecting and improving the health and environment of the people of Colorado*

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Colorado Department  
of Public Health  
and Environment

August 5, 1994

RECEIVED  
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Mr. Steven W. Slaten  
U.S Department of Energy  
Rocky Flats Plant  
Building 116  
P. O. Box 928  
Golden, Colorado 80402-0928

**RE: EPA Comments on OU-4 Draft Phase II RFI/RI Work Plan**

Dear Mr. Slaten,

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) has received, and is hereby forwarding, EPA's comments on the referenced work plan. The following clarifications are given relative to EPA's comments and to establish the Division's expectations for the content of the Final Phase II RFI/RI Work Plan and a subsequent Technical Memorandum (TM).

The Division's understanding is that DOE will redefine the field sampling plan to include geoprobe investigations such that monitoring well locations can be more adequately located. As such, DOE will be moving forward with the investigation under an observational approach rather than delaying the work.

EPA intended to say that a Field Sampling Plan (FSP) for the geoprobe studies has not been provided to the agencies. The Division's expectations are that the revised work plan will provide the geoprobe FSP. Therefore, the revised work plan should be submitted as a final version not as a TM.

DOE is advised that scope changes to the FSP may result in significant additional comment from the agencies, and resolution by DOE, before an approval of the final work plan can be granted. The Division will strive to minimize any delays associated with the re-review of the work plan and to maintain the current schedule for work plan approval.

EPA is correct in stating that DOE should report the results of the geoprobe studies in a TM as the rationale for specifying the number and locations of monitoring wells. It appears appropriate to delete the tentative locations of the monitoring wells from the final work plan and simply include them in the TM.

The Division concurs with EPA that the risk assessment component of the work plan should be structured to assess any risk under post-closure conditions, including eventual removal of seep-impacted surficial soils, removal of any soils beyond the operable unit boundary which exceed Preliminary Remediation Goals (PRG), and to assume ground water remediation to state standards.

MHS 27 10912

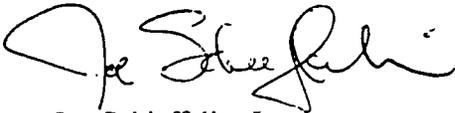
ADMIN RECORD

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The Division also concurs with EPA that inclusion of the risk assessment component into the final work plan is appropriate. The scheduled deliveries of the Phase II RFI/RI Report and the Corrective Measures Study/Feasibility Study (CMS/FS) are respectively April and December, 1996. Only a minor delay in the preparation and delivery of the CERCLA-required risk assessment could occur under the current CMS/FS schedule. A further justification is that the CMS/FS follows the Phase II RFI/RI Report without an intervening deliverable within which the risk assessment plan could be incorporated. Therefore, DOE should include the risk assessment plan in the final work plan rather than submit a subsequent deliverable.

If you have any questions concerning the contents of this letter, please contact Harlen Ainscough of my staff at 692-3337.

Sincerely,



Joe Schieffelin, Leader  
Rocky Flats IAG Unit  
Hazardous Waste Control Program

Attachment

cc: Daniel S. Miller, AGO  
Steve Tarlton, RFP  
Martin Hestmark, EPA  
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