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ROCKY FLATS PLANT, P O BOX 464, GOLDEN, COLORADO 80402 0464 • (303) 966 7000

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December 5, 1994

94-RF-11992

Frazer R Lockhart
Environmental Restoration Division
DOE, RFFO

Attn Kurt Muenchow

REQUEST FOR AN IAG TABLE VI MILESTONE EXTENSION FOR OPERABLE UNITS (OUS) 5 AND 6 - ECM- 073-94

Action Request an IAG Table VI Milestone Extension for OU5 and OU6 from the Environmental Protection Agency (EPA) and the Colorado Department of Public Health and the Environment (CDPHE)

Monday, November 21, 1994, EG&G presented a request to the EPA and the CDPHE for a decoupling of the Ecological Risk Assessment (ERA) Section from the Draft RFI/RI Report. The meeting concluded with the regulatory agencies being amenable to a schedule extension of the Draft and Final RFI/RI Report milestones for Operable Unit (OU) 5 and OU6 rather than decoupling the ERA Report from the Draft RFI/RI Report. With the potential of ecological risk becoming the primary risk driver, it is advantageous to submit the Baseline Risk Assessment (BRA) as a complete document in the Draft RFI/RI Report, as well as, the Final RFI/RI Report. EG&G recommends that DOE, RFFO pursue a milestone schedule extension for both the Draft and Final OU5 and OU6 RFI/RI Reports.

There are several reasons for the delayed completion of the ERA. The comments on the OU1 ERA portion of the RFI/RI Report revealed that the present scope of the OU level ERAs would not be acceptable for future OU ERAs. To address the comments concerning the OU1 ERA, an effort began to create a methodology for ERAs at Rocky Flats Environmental Technology Site (RFETS) that is consistent with current ERA methodology and practice and recent EPA guidance. The result was a watershed ERA that utilizes data from each OU located in the Walnut Creek drainage and the Woman Creek drainage. To facilitate the process of regulatory agency approval of the ERA restructuring, EG&G will generate three technical memoranda (TM) that will propose a methodology for adapting the present level of effort to the new approach. These TMs will pose a conceptual model, assessment endpoints, and a methodology for screening ecological contaminants of concern at RFETS. Approximately three months are added to the ERA schedule by these TMs. Lastly, the development of a methodology that revised the scope from a OU level to a watershed level was difficult to implement for several OUs. The Woman Creek ERA will acquire data from OU1, OU5, and a portion of both OU2 and OU11. The Walnut Creek ERA will acquire data from OU6, OU7, and a portion of both OU2 and OU11. Both ERAs will address sources in the Industrial Area that may affect ecological resources in the watershed.

The OU5 and OU6 schedules have been revised since the meeting with the regulatory agencies on November 21. The Draft RFI/RI Report schedule extends about three months for the Draft RFI/RI Report and two for the Final RFI/RI Report for both OUs. Two adjustments caused the need for an extension request beyond the six weeks discussed in the meeting on November 21. First of all, six weeks are

CLASSIFICATION

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| UNCLASSIFIED | ✓ |
| CONFIDENTIAL | |
| SECRET | |

AUTHORIZED CLASSIFIER
UNCLASSIFICATION
NEW WAIVER PER
CLASSIFICATION OFFICE

REPLY TO RFP CC NO
N/A

ACTION ITEM STATUS

PARTIAL/OPEN
CLOSED

APPROVALS

RIG & TYPIST INITIALS
NAH/CA

ADMIN RECORD

A-0006-000338

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necessary to incorporate the ERA into the Baseline Risk Assessment (BRA) for incorporation in the Draft RFI/RI Report. This includes document reproduction. Secondly, three weeks are added by appropriating 20 days for regulatory agency document review for each TM.

The proposed IAG Table VI milestone dates are

| | | |
|-----|---------------------|-------------------|
| OU5 | Draft RFI/RI Report | November 1, 1995 |
| | Final RFI/RI Report | April 2, 1996 |
| OU6 | Draft RFI/RI Report | October 2, 1995 |
| | Final RFI/RI Report | February 21, 1996 |

The following table provides external deliverable dates for Ecological Risk Assessment Methodology (ERAM) TMs and OU specific ERA TMs to give the regulatory agencies an opportunity to plan for review time.

| | |
|---|------------------|
| Draft ERAM Sitewide Assessment Endpoint TM | January 16, 1995 |
| Draft ERAM Sitewide Conceptual Model TM | January 6, 1995 |
| Draft ERAM Sitewide COC Screen Methodology TM | January 16, 1995 |
| OU5 Draft Problem Formulation TM | April 12, 1995 |
| OU6 Draft Problem Formulation TM | March 13, 1995 |

Several meetings will be convened with the EPA and CDPHE at regular intervals to review status and gain input into the documents. If these dates meet with DOE, RFFO approval, please transmit a schedule extension request to EPA and CDPHE.

If you have any questions, please call Neil Holsteen of my staff at extension 6987.



E C Mast
Program Manager, Operable Units 5 - 7 Closures
Environmental Restoration Program Division
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NAH cb

Ong and 1 cc - F R Lockhart