

regardless of assessed risk. These closure requirements are consistent with EPA guidance for "presumptive remedies" (OSWER Directive 9203.1-021), actions demonstrated to minimize risk from landfills. The EPA guidance states that quantitative risk assessments are not required to support these remedies. These remedies include capping, and infiltration minimization consistent with CHWA requirements. These actions are driven by regulations and are not optional or "discretionary". Therefore, any interim measures would have to be consistent with these closure requirements and are not driven by the Phase I risk assessment.

5. Because the Phase I investigation must also support closure, field activities identified in the approved work plan have provided significantly more data than that necessary to support analysis of upward pathways only. In fact, the data obtained from the Phase I investigation coupled with the current sitewide groundwater monitoring network would provide sufficient data to support a significant amount of risk assessment covering all the potential pathways.
6. The current regulatory agency negotiations for OUs 1 and 2 have included negotiations regarding the data evaluation process and the subsequent identification of contaminants of concern for the Nature and Extent sections and the HHRA sections of the RFI/RI reports. The lack of clear resolution on this process has impacted the schedule for OU 7. The regulatory agencies have stated that the current process including the statistical comparisons are unacceptable and DOE guidance has been for OU 7 to pursue the development of the most technically defensible approach for data evaluation and COC identification to present to the agencies. The result of this is that OU 7 will not meet the October 12, 1993 milestone for submittal of the draft Phase I RFI/RI report. Because the above-referenced issue is still not resolved, the total impact to the schedule cannot be fully assessed. It is anticipated that the request for schedule extension will be developed for transmittal in late July so that the agencies receive this a minimum of 60 days prior to the milestone.

Proposal

In light of the facts outlined above, EG&G proposes to enter into negotiations with the regulatory agencies to streamline the IAG process for OU 7 by the following actions:

- A. Remove the Phase I risk assessment requirement for the Phase I RFI/RI report deliverables.**

Justification

Risk assessment is not required for the interim measure process or closure since EPA guidance identifies demonstrated technologies and the CHWA requires non-discretionary closure actions. Both drivers assume institutional controls that have previously demonstrated risk reduction. The information that would be derived from the Phase I risk assessment process is no longer necessary to support the IM/IRA process or landfill closure.

Advantages

Schedule impacts resulting from negotiations with the agencies regarding data evaluation in risk assessment could be minimized and would likely result in little or no impacts to the Phase I milestone schedule.

B. Identify CHWA closure requirements and EPA-demonstrated technologies as the proposed IM/IRA.

Justification

Closure requirements for the Present Landfill are non-discretionary, and therefore, will be the technologies implemented for the IM/IRA process. In addition, EPA guidance supports the identified technologies.

Advantages

Since any interim measures for OU 7 must support CHWA landfill closure requirements regardless of risk, and EPA guidance identifies these same technologies, it would be much more cost effective to recognize these technologies and not expend large amounts of resources in the development of an exhaustive IM/IRA decision document. Streamlining this document to identify these mandated technologies would significantly reduce the time and expense of a document that evaluates many technologies against performance criteria in a decision process unnecessary here because the decision is pre-ordained in CHWA requirements and also supported by EPA guidance. Cost savings are estimated at 100K, (a 30 percent reduction in effort), and a 6-month acceleration of schedule.

Accelerating the IM/IRA decision document by designing it to be a streamlined proposal for the required closure requirements could be accelerated to begin in FY 93 since it would no longer be dependent on the Phase I risk assessment. This would allow for submittal ahead of the IAG schedule by up to 6 months. This would allow finalization of the document to occur in FY 94 rather than FY 95. The design process could then begin in late FY 94 or FY 95. In addition, construction could be coordinated with the opening of the New Landfill eliminating costs for redundant interim closure activities by Facility Operations.

C. Incorporate a full pathways analysis into the current Phase I RFI/RI subcontract modifying the field sampling and data quality objectives sections of the Phase I Work Plan to support this, and thus eliminating the requirement for a Phase II Work Plan.

Justification

The main concern EPA has expressed during an informal proposal meeting held June 8, 1993 centers around halting the Phase I risk assessment process in midstream. Halting the process after Phase I to restart during the Phase II efforts would not be cost effective or optimize current project expertise which would impact schedule.

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New "full pathways" milestones would be negotiated with the agencies to alleviate the other EPA concern that no "hammer" would be in place to ensure the risk assessment was completed.

Most of the data and field work necessary to support a full pathways analysis was completed during the Phase I field activities as a result of the incorporation of closure requirements into the current Phase I RFI/RI Work Plan data quality objectives (DQOs).

Advantages

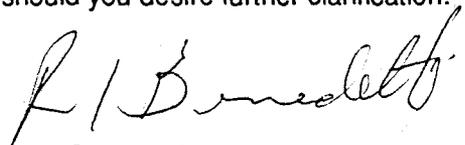
Current project staff would continue risk assessment activities without the impact of the current 2-year shutdown resulting from the phased approach. This would eliminate costs resulting from the "ramping up" of another risk assessment team down the road and remobilization for field efforts for Phase II resulting in significant retraining costs for field teams estimated at 80K.

Incorporation of a full pathways objective into the Phase I work plan would eliminate the need for a Phase II work plan, reducing project costs by 300K and the schedule by one year.

The Phase II RFI/RI report would essentially be the full pathways risk assessment and results of additional "nature and extent" analyses. The report would not be dependent on significant field or analytical efforts. This is estimated to reduce cost by 30 percent, or approximately 250K, and accelerate the schedule by 6 months.

A detailed proposal and new baseline schedule will be developed for submittal to the agencies, and the negotiation process will commence pending approval by DOE management to pursue this proposal. Your written concurrence is necessary before EG&G can initiate any further action on this issue.

Please feel free to contact T. P. O'Rourke of Remediation Project Management at extension 8577 should you desire further clarification.



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