

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

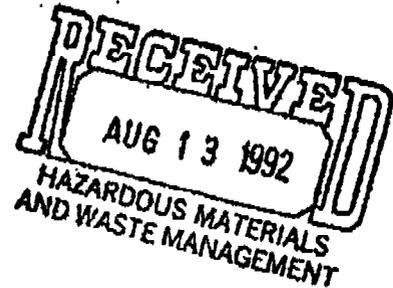
REGION VIII

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

AUG 12 1992

Ref: 8HWM--FF

Mr. Gary Baughman
Hazardous Waste Facilities Unit Leader
Colorado Department of Health
4210 East 11th Avenue
Denver, Colorado 80220-3716



RE: Review of OU 8 Draft RFI/RI Work Plan

Dear Mr. Baughman:

Enclosed is the Environmental Protection Agency's technical review of the Draft RFI/RI Work Plan for Operable Unit 8, Rocky Flats Plant. There are many comments that need to be addressed, especially with regard to the field sampling plan.

The most general shortcoming of this plan is that it fails to consider the Protected Area IM/IRA now in development or other ongoing activities which make implementation as written very unlikely. In combination with DOE's apparent lack of commitment to the IAG as documented in other correspondence, this failure reduces the work plan to a paperwork exercise which achieves only superficial compliance with established milestones. Until and unless this work plan can be integrated into DOE's overall approach to the Transition, D&D, and Environmental Restoration of Rocky Flats, EPA sees no reason to grant approval of it.

If you or members of your staff have any questions regarding EPA's comments, please contact Bill Fraser at 294-1081.

Sincerely,

A handwritten signature in black ink that reads "Martin Hestmark".

Martin Hestmark, Manager
Rocky Flats Project

Enclosure

cc: w/enc.
Harlen Ainscough, CDH
Skip Dinges, PRC