



ROY ROMER  
Governor

PATRICIA A. NOLAN, MD, MPH  
Executive Director

Hazardous Materials and Waste Management Division  
4210 East 11th Avenue  
Denver, Colorado 80220-3716  
(303) 331-4830 / FAX (303) 331-4401

Telefax Numbers:  
Main Building, Denver  
(303) 322-9076

Piarmigan Place, Denver  
(303) 320-1529

First National Bank Building, Denver  
(303) 355-6559

Grand Junction Office  
(303) 248-7198

Pueblo Office  
(719) 543-8441

April 29, 1992

Mr. Frazer Lockhart  
U. S. Department of Energy  
Rocky Flats Office  
P.O. Box 928  
Golden, Colorado 80402-0928

RE: Final Phase I RFI/RI Workplan for OU 9 - Original Process Waste Lines (OPWL)

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the resubmitted portions of the above referenced document submitted by DOE and prime operating contractor, EG&G. We hereby grant final approval to the document with the exception of those portions discussed below.

We are withholding approval of both the ARARs section (pending further resolution of the site-wide ARARs) and the Environmental Evaluation (EE) section. As you are aware, the scope of the EE for OU 9 was significantly decreased because the OPWL lie within the industrialized portion of RFP. Since the EE for OU 9 will act as a model for the industrialized portions of the plant and because, in its present form, the EE is new to us, we are giving it a more complete review. Approval for the EE will be included in a subsequent letter. Because we are also withholding approval of the ARAR section, the Division expects that the FSP will be analyzing samples so as to support the lowest possible ARAR for each constituent.

Additionally, the soil sampling methodology set forth in the workplan is not representative of the methodology agreed upon in staff-level meetings. It is our understanding that this issue will be corrected in Technical Memorandum #1 which will also cover results from additional data compilation and the FSP for the radiation survey and the Stage I pipeline and tank investigation.

The Division would like to emphasize that, although there are no

submittal deadlines for the technical memorandums associated with this workplan, it is in DOE's best interest to submit the TMs to the agencies in a timely manner so as not to jeopardize the RFI/RI Report submittal milestone.

Additionally, the Division emphasizes that OU 9 field work was scheduled to begin in early February, 1992. Currently, staff level conversations have indicated that field work will not commence until August, 1992 - a seven month delay. The Division gave conditional approval to the workplan so that delays in field work implementation could be avoided. Further, the Division understands that the investigation of the portions of OU 9 within the PA may be delayed. These items indicate that DOE may have trouble meeting the RFI/RI Report submittal milestone. We strongly urge DOE to officially inform the agencies about developments that may impact milestones at the earliest possible time.

If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 331-4421.

Sincerely,



Gary W. Baughman  
Unit Leader, Hazardous Waste Facilities  
Hazardous Materials and Waste Management Division

cc: Martin Hestmark, EPA  
Bruce Thatcher, DOE  
Paul Bunge, EG&G  
Dennis Schubbe, EG&G  
Barbara Barry, RFPU  
Daniel S. Miller, AGO