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SEP 15 1992

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Ref: SHWM-FF

Mr. Gary Baughman  
Colorado Department of Health  
4210 E. 11th Ave.  
Denver, CO 80220

Re: OU 10 Final Phase I RFI/RI  
Work Plan Approval

Mr. Baughman:

EPA has reviewed the revised final version of the subject document. In general, this final version adequately addresses EPA's previous comments on the final work plan. In the interest of moving forward, EPA recommends approval of the work plan upon resolution of the following concern.

As you may know, DOE needs to keep operating the 904 Pad (IHSS 213) and 750 Pad (IHSS 214) storage areas for the storage of current pondcrete and saltcrete wastes, as well as the future pondcrete wastes to be generated during the solar ponds remedial action. The work plan includes field sampling activities which are to be conducted external to the pads. It appears that complete characterization of areas outside the pads will not provide a benefit at this point due to the fact that the main source of contamination will still be left on the pads and may further contaminate these areas in the future. EPA prefers to delay the majority of RI work for these two IHSSs until it is determined by CDH that these storage areas are no longer needed and are ready to go through closure process. Installation of monitoring wells may be appropriate in light of the RCRA implications with the operation of these units. EPA suggests meeting in the near future to discuss this issue and to discuss administrative and technical procedures for ensuring that the storage pads are operated in a safe manner until they are closed.

EPA expects DOE to implement the work plan according to the schedule presented in section 6.0. In this manner, DOE can ensure meeting future milestones.

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**ADMIN RECORD**

A-OU10-000067

Please do not hesitate to contact Arturo Duran or Dave Maxwell of my staff, at (303) 294-1080 or (303) 294-1082 respectively, with any questions you may have and to set up a meeting.

Sincerely,



Martin Hestmark, Manager  
Rocky Flats Project

cc: Frazer Lockhart, DOE  
Bruce Thatcher, DOE  
Dennis Schubbe, EG&G  
Joe Schieffelin, CDH  
Dave Maxwell, EPA  
Arturo Duran, EPA