



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2405

Ref: 8HWM-FF

AUG 1 1991



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

re: Approval of SOPs
Submitted 7/19

Dear Mr. Lockhart:

We have reviewed the subject documents to determine their adequacy in response to the conditions of approval stipulated in our letter of 29 March 1991. We find the SOP's submitted on 19 July 1991 incorporate an acceptable response; they are thus hereby approved for use in starting up the RI field program.

It is our understanding that the SOP's contained in this submittal represent only those required to support a drilling program, and that others will be submitted at a later date in order to complete the set. According to our records, in addition to the Air volume, SOPs FO.1 and GW.1 remain to be resubmitted pursuant to our conditions of approval. In addition, SOPs for drilling in high-hazard areas, and for use of porous-bulb (BAT-type) sampling equipment remain to be developed; these will be required prior to start of the OU 2 field work.

Subsequent submittals are apparently also planned to incorporate other EPA and CDH comments, since few of the "Additional Items for Consideration" provided have been incorporated to date. We expect those items to be addressed in future revisions, and reserve the right to request further SOP modifications based on the results of field oversight and experience with the SOP's. CDH has specifically expressed continuing concern over the lack of complete written procedures to cover handling of drill cores from the time they come out of the hole to the time they reach the logging trailer. This problem was identified in CDH's comments, and was not completely covered in the revisions. CDH will cooperate in oversight of field activities, and provide specific documentation of additional items which will need to be included in another revision of GT.1.

Please note that we requested, but did not receive any specific responses to our conditions of approval for these SOP's, nor was any key to indicate changes provided. In fact, no explanation at all was given as to the nature or purpose of the submittal or the response expected. The failure to provide this

information resulted in some delay and confusion in the review process. If the SOP's are to be effectively used and updated, DOE must provide an explanation of future submittals indicating what is being changed and why, and key those submittals in some fashion to indicate specifically where changes were made.

Again, we wish to emphasize that DOE/EG&G are in the best position to monitor the status of these documents, and adequacy of these procedures, and must correct them through updates as expeditiously as possible. Compliance with an obsolete SOP (even if previously approved), will not justify an inadequate Remedial Investigation. If you have questions or would like to discuss the progress of this effort, please contact Bill Fraser at 294-1081.

Sincerely,



Martin Hestmark, Manager
Rocky Flats Project

cc: Barbara Barry, CDH
Tom Olsen, DOE
Tom Greengard, EG&G
Gary Baughman, CDH