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August 13, 1991

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

RE: Applicable or Relevant and Appropriate Requirements (ARARs)

Dear Mr. Lockhart,

The Colorado Department of Health (CDH) and the Environmental Protection Agency (EPA) would like to propose that DOE develop a standardized method for the preparation of the potential chemical specific ARARs section of the RFI/RI Workplans. Thus far, in our review of the various workplans that have been submitted, the agencies have not seen a consistent methodology employed by DOE in presenting the potential ARARs. In an effort to correct this situation and facilitate workplan development, CDH and EPA propose the following:

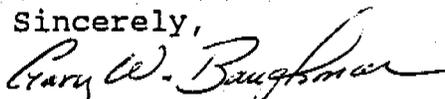
- 1) DOE and EG&G would submit a new and separate site-wide document to the regulatory agencies containing a comprehensive listing of the universe of potential chemical specific ARARs. This document could be in the form of tables similar to those presented in the Workplans and would include the individual constituents down one axis and the regulatory sources across the other axis. Potential ARAR values for air, soil, surface water, and ground water would be included in these tables. This group of tables would be easily reviewed by the agencies and would act as a source for the potential chemical specific ARARs that are included in the RFI/RI Workplans and all subsequent documents. We recognize that the individual standards presented in this document will periodically change. However, if CDH, EPA, and DOE make a commitment to keep one another informed about changing standards, then the document should remain useful.
- 2) DOE would use this document to define the appropriate ARARs for individual workplans. This could be done in one of two ways. First, similar to what is being done presently, only those chemicals that have a known or suspected presence

within the particular OU would be presented in the ARAR section of the Workplans. This would be done with the understanding that if more constituents are found later, they would be added to the potential ARAR list. The second possibility is that entire groups of appropriate media specific ARARs would be included in the Workplans. These media groups would be based upon the media being investigated within the IHSSs of that OU.

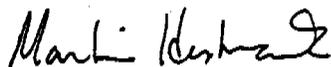
CDH and EPA would like to further propose that a meeting be arranged where these concepts can be discussed. We believe that a consistent approach to ARARs at this early point in the remedial process will prevent more serious misunderstandings later when decisions are being made and should also make workplan development easier.

If you have any questions regarding these matters, please call Joe Schieffelin of CDH at 331-4421 or Bill Fraser of EPA at 294-1081.

Sincerely,



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



Martin Hestmark
Manager, Rocky Flats Project
EPA, Region VIII

cc: Dan Miller, AGO
Peter Ornstein, EPA
Tom Greengard, EG&G
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Barbara Barry, RFPU