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DIST.	LTR	ENC
ZKE, J.C.		
INGAME, A.H.		
P, R.D.		
UCHER, D.W.		
S, J.G.	X	
RED, J.E.	X	
RERA, D.W.		
RIS, L.R.		
KOR, F.J.		
NCIS, G.E.	X	
OWIN, R.		
Y, T.J.		
ER, F.H.		
J.P.		
E, P.B.		
SH, J.M.		
Y, W.A.		
EBO, J.A.		
E.M.	X	
STIC, J.R.		
HEWS, T.A.		
RRENS, B.E.		
GAN, R.V.	X	
TH, P.		
MER, L.A.		
TER, G.L.	X	
UTO, V.M.		
ADES, J.I.	X	
FIL, B.F.		
NSON, E.R.		
E, J.S.		
INSON, R.B.		
IAMS, R.E.		
ON, J.M.		
NG, E.R.		
E, J.O.		
BBS, FD	X	
EVIN, ME	X	
OVD, SA	X	
MPSON, J	X	
RES CONTROL	x	x
FIC		

ASSIFICATION:		
NI		
CLASSIFIED	X	
NFIDENTIAL		
RET		

HORIZED CLASSIFIER SIGNATURE

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EPLY TO LTR NO.

APPROVALS

& TYPIST INITIALS

L/fm

6469 (Rev. 3/91)

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

October 16, 1991

91-RF-6962

Robert M. Nelson, Jr.
Manager
DOE, RFO

Attn: D. P. Simonson

NPDES/FFCA CHROMIC ACID INCIDENT IMPLEMENTATION PLAN - JMK-0743-91

We need a series of meetings with the Environmental Protection Agency (EPA) to reach agreement on the scope of actions to be taken under the Federal Facilities Compliance Agreement (FFCA) in response to the Chromic Acid Incident. The proposed corrective actions are a wide ranging and complex set of tasks with an expected budgetary impact well in excess of $40 million and should not be started without EPA concurrence on scope.

As you are aware, the draft Plan and Implementation Schedule was submitted to EPA in November, 1990. Although 11 months have elapsed, EPA has not yet provided comments on the plan. EG&G is reluctant to begin detailed project planning and design or expend funds on some of the larger corrective action projects until there is confirmation that the proposed actions will satisfy the EPA. Partly as a result of this delay in scope resolution many of the milestones originally proposed are no longer valid and will need to be renegotiated.

At a recent meeting at which members of our Surface Water Division staff, your environmental staff, and representatives from the nearby cities, Colorado Department of Health (CDH), and EPA were in attendance the subject of the NPDES FFCA Chromic Acid Incident Plan and Implementation Schedule was raised. Bob Shankland of EPA indicated that it would be desirable for DOE to send a letter to EPA reminding the agency of the need for scope resolution.

We feel that it is appropriate and desirable for DOE to send EPA a letter requesting a series of meetings to address the FFCA Chromic Acid Incident Plan and Implementation Schedule. This letter would document the plant's good faith and remind EPA of their need to complete the review of the plan. If you concur, we will be happy to prepare a draft letter for your review and forwarding.

J. M. Kersh, Associate General Manager
Environmental and Waste Management

MEL:fm

Orig. and 1 cc - R. M. Nelson, Jr.

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