



City of Broomfield

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(303) 489-3501

Post-it™ Fax Note 7671		Date 9/21	# of pages 4
To Dorothy Newell	From John Corsi		
Co./Dept.	Co.		
Phone # 2497	Phone # 6526		
Fax #	Fax #		

September 20, 1999

John Corsi, Kaiser-Hill
 Rocky Flats Environmental Technology Site
 10808 Highway 93, Unit B, Building # T117A
 Golden, CO 80403-8200

RE: Comments on the Final Draft Building 776/777 Closure Project Decommissioning Operations Plan

Dear Mr. Corsi:

The City of Broomfield appreciates the opportunity to review and comment on the Rocky Flats Environmental Technology Site (RFETS) Final Draft Building 776/777 Closure Project Decommissioning Operations Plan (DOP).

IN-PROCESS KNOWLEDGE

Section 4.3.3 implies that in-process knowledge may be the only means of classifying some materials as non-contaminated. In-process knowledge is helpful, but should not be the only means of verifying that radiological contamination does not exist on materials and equipment removed from Buildings 776/777. Verification monitoring which includes some means of quantifying radiation levels must be employed.

FREE-RELEASE CRITERIA

① In our letter dated August 11, 1999, regarding the Recycling Concrete RSOP we requested additional explanation regarding the applicability of DOE Order 5400.5 to releasing potentially contaminated volumetric materials such as concrete rubble. We have not yet received a written response to the questions raised by that letter. According to Section 4.4.1 of the Draft 776/777 DOP, "If all radiological sample measurements are below the volume contamination thresholds provided in DOE Order 5400.5, the related volume of material is considered sanitary waste and may be free-released." We have been unable to find a volume contamination threshold in DOE Order 5400.5, however, it does state that in cases of rubblized materials, DOE headquarters is required to approve free-release criteria on a case-by-case basis. Please provide the excerpt from DOE 5400.5 that specifically provides the volume contamination threshold. Based on the



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following information provided in the Draft 776/777 DOP, this issue continues to be a concern:

- According to Section 2.2, in 1969 a major fire resulted in the widespread contamination of the building's roof, walls, and floors.
- According to Section 2.3, multiple areas of radiological contamination exist from a waste water line break, and soil contamination (both from the 1957 and 1969 fires and other accidents). These are potential routes to contaminating the outside of the below-grade walls and groundwater.
- According to Section 4.3.2.1, radiologically contaminated material was buried under the building as a result of the 1969 fire. These are potential routes to contaminating the outside of the below-grade walls, soil, and groundwater.
- According to Appendix A, many of the floor areas have radiological contamination at levels greater than 1 million counts per minute (cpm).
- According to Appendix A, page 187, in at least one area "The depth of the contamination into the floor has not been established. The contaminated fire water from the 1969 fire may have penetrated the floors at the expansion joints." These are potential routes to contaminating the outside of the below-grade walls, soil, and groundwater.
- According to Section 6.7, "Concrete that meets the free-release criteria prescribed by the RFETS DDCP will be recycled as fill material to contour the land when decommissioning activities are completed." The City of Broomfield requests a copy of the DDCP.

Prior to removal of air filtration equipment, building walls, ceilings, and other safeguards, the materials that have been buried under the floor should be removed. We are concerned that the removal of contaminated materials from under the floor may be problematic. The containment safeguards of the existing buildings should be maintained until this very challenging task of removing all materials that have radiological contamination have been safely removed from under the buildings.

The PCB "free-release" value of 50 ppm in Table 5 of the DOP is not specifically provided in 40 CFR 761.62 as written in the table. Please provide justification for the statement "95% Upper Confidence Limit (UCL) of the mean value of a representative sample . . . does not exceed 50 ppm". Typically, 50 ppm triggers mandatory cleanup actions. Table 5 seems to contradict the statement in section 4.4.4 which states that "If a material meets the definition of 'PCB Remediation Waste' (i.e., potentially containing PCBs from historical release), the free-release concentration is 1 ppm PCBs as

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determined in accordance with the requirements of 40 CFR 761.61, Subpart G." We agree that the free-release value of 1 ppm PCBs is appropriate. We suggest that Table 5 be corrected to reflect the 1 ppm PCB free-release limit.

The DOP states that "Air emissions . . . will be controlled and monitored in accordance with the Site H&S Program and applicable environmental regulatory requirements." We are particularly concerned with how emissions which are generated during demolition activities will be controlled and monitored. The City of Broomfield requests a copy of the documents that describe how air emissions will be controlled and monitored.

INDEPENDENT VERIFICATION

Independent sampling and testing is an important element in verifying that all areas have been completely decontaminated. In Section 4.7 of the DOP, DOE states that independent sampling and testing may be included as part of the Independent Verification. We request that the word "may" be replaced by the word "will".

POTENTIAL IMPACTS TO AIR AND WATER DRAINAGES

In section 8.5, the DOP states that following the removal of buildings and other containers within the 776/777 cluster, that bare ground will pose the potential for erosion of those soils by wind and water processes. The DOP states that "silt fencing or a similar protective device will be installed to prevent or minimize the possibility of water-borne soil leaving the immediate area and entering drainage ways." This concept may not be protective of human health and the environment for the following reasons:

- The potential for air-borne soil leaving the area is not addressed.
- Silt fencing requires continual inspection and repair.
- Silt fencing tends to fail during high precipitation runoff events.

In traffic areas, rock aggregate should be placed over bare ground in addition to silt fencing to control wind and water erosion. Alternatively, revegetation and/or application of soil stabilizers should be used for non-traffic areas as these techniques are likely to be more effective at controlling soil erosion from wind and water.

Section 6.2.8 states that wastewater generated from decommissioning activities may be treated or directly discharged in compliance with the requirements of the NPDES Permit. What are all of the types of water that could be directly discharged? Where would these discharges be routed?

Section 8.10 states that dust and sediment generation from the project may reach Walnut Creek, therefore, potential impacts to the Preble's meadow jumping mouse habitat are a concern. The DOP fails to state that water quality standards for Walnut Creek are very

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stringent and that if actinide-laden dust or sediment generated from this area reaches Walnut Creek that a violation of the water quality standard could easily occur.

IMPLEMENTATION SCHEDULE

Although some schedule information is provided in Appendix E, it is not clear when major activities related to the 776/777 building cluster deactivation and decommissioning will be occurring. From the text provided in Section 10, the first major schedule date is FY04, however the schedule in Appendix E shows that activities are already occurring. The DOP also states that the information is based on the 2010 closure schedule. Please provide a schedule that includes just the major activities covered by the 776/777 DOP according to the 2006 closure plan.

Thank you for the opportunity to comment on this important document. The City of Broomfield expects that the Department of Energy will provide the documentation requested above prior to implementing this DOP. If you have any questions, please feel free to call me at 303-438-6363.

Sincerely,



Kathy Schnoor
Environmental Services Superintendent