

# ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE ER REGULATORY CONTACT RECORD

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**Date/Time** June 18, 2002

**Site Contact(s)** RW Scheck  
Project Manager  
Original Landfill IM/IRA Decision Document

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**Regulatory Contact  
Phone** Jean Mackenzie  
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**Agency** EPA

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**Purpose of Contact** IHSS 115/196  
Original Landfill IM/IRA Decision Document  
6/26/02 Agenda and 5/29/02 Minutes

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## Discussion

Jean MacKenzie conveyed the following in our telephone conversation regarding (1) the agenda for the next regularly scheduled meeting on the Original Landfill (6/26/02)\* and (2) corrections to the Minutes of the previous 5/29/02 meeting

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- 1 RAOs EPA would like to add at least one additional objective to the list of Remedial Action Objectives to address the containment and safe disposal of waste fill
  - 2 ARARs EPA would not be receptive to the proposed ARAR presentation or discussions at the next regular OLF agency meeting on 6/26\* Agency personal (Dan Miller and Lorraine Ross) required for this discussion would not be available at that time, and EPA would need to review the ARAR write-up before any meaningful discussions After this joint CDPHE/EPA review, EPA's OLF Project Team will be available for discussion A date of July 10 may be a viable date for this ARAR discussion
  - 3 Cost RWS mentioned that electronic problems were hampering efforts to convey the cost estimates and assumptions Again, EPA would not be receptive to proposed cost discussions at the next regular OLF agency meeting on 6/26\* without adequate time for review Although RWS will expedite, EPA will require several weeks to perform a detailed analysis of the estimates
  - 4 For the CERCLA criteria of "Long-term Effectiveness," EPA's 5/29 meeting notes indicate that the group ranked Alternatives 2 & 3 (which incorporate an ET Cover) "Low" (along with Alternate 1, No Action) In contrast, the published meeting minutes indicate a ranking of "Moderate" long-term effectiveness for Alternatives 2 & 3 EPA stated that they would continue to rank Alternatives 2 & 3 'very-low' if the ET cover does not meet RCRA Subtitle C requirements
  - 5 Also, EPA remains confused as to why KH is using this same term [i.e., "ET"] to describe the covers for both the PL and the OLF the PL is RCRA Subtitle C equivalent, whereas the OLF cover, apparently, will have no accepted design standards EPA considers the use of the term "ET Cover" for a non-RCRA Subtitle C equivalent cover to be misleading RWS stated that the nomenclature will be reviewed for appropriateness, after the ARAR issues have been resolved

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ADMIN RECORD

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6 Alternate 4B, Extraction and On-Site Disposal EPA is of the opinion that KH has not evaluated or explored this alternative sufficiently or thoroughly EPA considers these sites as worthy of evaluation as a disposal site for the OLF waste

- the unfinished 'Unused Landfill' (ULF)
- the Present Landfill
- a possible location just north of the current OUS area

Further, EPA has a considerable latitude on the design of on-site waste disposal systems under CERCLA This flexibility extends to cover standards and the requirement (or not) for a bottom liner

7 EPA requested clarification of Item 2 of the 5/29 meeting minutes

*"K-H distributed a current project schedule indicating the draft IM/IRA will be issued approximately Sept 6 for formal public comment upon its revision per CPDHE's official review "*

RWS stated the statement more clearly reads as follows

*"K-H distributed a current project schedule indicating the draft final IM/IRA will be issued approximately Sept 6 for formal public comment This draft final IM/IRA document will have been revised to reflect agencies' review and comments*

8 EPA understands that the Site Characterization (task) report will be revised (per draft responses to agency comments) and re-issued, not as a stand-alone report, but as Section 2 of the draft of the IM/IRA Re-iterating, EPA's concurrence and acceptance of the Project's revision to this task report are contingent on their review of the revised text

9 Assuming EPA is given the ARAR section on 6/26\*, July 10<sup>th</sup> may be the first open date and next opportunity for a meeting for meaningful discussions of ARARs (and Cost)

#### POST CONTACT

\* The regularly scheduled OLF meeting on 6/26 was subsequently cancelled/postponed The next regular meeting is 7/24/02

RWS  
6/20/02

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Contact Record Prepared By. RW Scheck X7872

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