



ROCKY FLATS

ENVIRONMENTAL RESTORATION UPDATE



A PERIODIC UPDATE ON ROCKY FLATS CLEANUP • APRIL 1992

Development of Plans and Budgets for RFP

Roadmapping

The planning and budgeting process starts with "roadmapping." A "roadmap" describes the sequence of activities necessary to resolve environmental restoration and waste management programmatic issues, just as a real map shows what paths lead to a destination. The roadmaps will be used to bring RFP into full compliance with all laws, regulations, and orders and to meet or exceed cleanup goals.

Activity Data Sheets/Rocky Flats Plant Five-Year Plan

Following completion of the roadmaps, Activity Data Sheets (ADSs) are prepared. ADSs contain task descriptions, suggested funding levels, schedules, and milestones for specific environmental restoration and waste management activities.

Two funding levels are shown for the activities: 1) a requirements level that represents the minimum funding required to meet or surpass regulations, protect human health and safety and the environment, and make progress towards cleanup goals; and 2) another level that may not be sufficient for meeting requirements.

ADSs are prepared for the current fiscal year plus two; e.g., FY94 will be planned in FY92. Information from the ADSs is then compiled into the *Rocky Flats Plant Five-Year Plan* and submitted as a budget request to DOE Headquarters (DOE-HQ). The *Rocky Flats Plant Five-Year Plan* also feeds into the national DOE-HQ *Environmental Restoration and Waste Management Five-Year Plan*, which outlines DOE-HQ's plans for eliminating or reducing risk to human health and safety and the environment posed by past, present, or future operations at all DOE facilities.

Budget

The federal budget cycle covers three years – the planning year, the budget year,

and the fiscal (operating) year. (The federal fiscal year begins on October 1 of one year and ends on September 30 of the following calendar year.) Each fiscal year has a three-year budget cycle, and DOE must begin planning and budgeting for each fiscal year two years before that fiscal year begins. That is, a planning year and a budget year precede a fiscal year. Because of the overlapping of the three-year cycles, a given fis-

As the mission of the Rocky Flats Plant (RFP) shifts away from weapons production, plans and budgets now being developed for environmental restoration and waste management are likely to expand.

This planning and budgeting process for environmental restoration and waste management consists of many interrelated steps. The goal of these steps is to identify what needs to be done at RFP, how to do it, and how much money is necessary.

The process begins with "roadmapping," in which issues and concerns are identified in order to set goals. The specific tasks and resources necessary to meet those goals are described in Activity Data Sheets, which are compiled and issued as a budget request in the form of the *Rocky Flats Plant Five-Year Plan*. A *Site-Specific Plan* for environmental restoration and waste management for a given fiscal year is then developed from the *Rocky Flats Plant Five-Year Plan* to describe which tasks will occur during the next fiscal year, given the national priorities and the budget provided to the site for that year.

cal year is also a planning year for another fiscal year and a budget year for yet another fiscal year.

For example, the 1993 fiscal year (FY93) budget cycle comprises the following stages:

- Planning year. Between October 1, 1990 and September 30, 1991 (FY91), DOE managers plan what activities will be needed in FY93 to meet DOE goals, estimate how much these goals will cost, and prepare a budget proposal for each major DOE program.
- Budget year. Between October 1, 1991 and September 30, 1992 (FY92), the Office of Management and Budget, the President, Congress, and DOE negotiate the budget proposals, and Congress appropriates funds for each major DOE program.
- Fiscal (operating) year. Between October 1, 1992 and September 30, 1993 (FY93), DOE spends the appropriated funds to conduct the activities outlined in the planning year.

Site-Specific Plan (for one fiscal year)

The one-year *Site-Specific Plan* (SSP) draws information from all the above items. It describes specific activities that will take place at a particular DOE facility in the upcoming fiscal year.

The SSP for Rocky Flats outlines RFP's plans for funding to be appropriated by Congress for the fiscal year. For example, the FY93 SSP will contain the planned activities and budget request for FY93.

Each facility's SSP provides for public comment on environmental restoration and waste management activities at that site. The Rocky Flats FY93 SSP is scheduled to be released in September 1992. Upon its release, a 60-day public comment period will begin. A comment response document will be issued after the comment period ends. Comments received on the FY93 SSP will be considered for use in the planning and development of the FY94 SSP and the FY95 ADSs.

RCRA Part B Permit Modifications

DOE has requested three additional modifications to its permit to store hazardous wastes at RFP. These changes, requested in early 1992, would provide for container storage in six areas at or near radiation detection equipment, the addition of several EPA waste identification codes to existing permitted units, expanded hazardous waste training for all employees, reformatting of the permit, and minor definition and description changes for storage containers.

The first two of these modification requests to the Resource Conservation and Recovery Act (RCRA) Part B permit must be reviewed and approved by the Colorado Department of Health (CDH). These requests require 60-day public comment periods; the first ended March 22, 1992, and the second will end April 4, 1992. A public information meeting for both requests was held on February 13, 1992. The third modification request requires no public comment or response from CDH.

Major provisions of the modifications, which are the fourth, fifth, and sixth to be requested since the permit was issued under RCRA in October 1991, are listed below.

Modification Four

- Add several EPA hazardous waste codes to five of the nine permitted waste storage units. Those codes identify hazardous waste constituents stored in these units and reflect improved characterization of waste that has been in storage.
- Reclassify six container storage units from "90-day storage" to "permitted storage" to allow for storage at or near container radiation detecting equipment, called counters. These counters are used to determine the radioactive content of the waste within a container without opening the container. This practice limits the potential for employee exposure to radiation. An accurate determination of the level of radioactive material in the waste is necessary in order to properly process, segregate, and store the waste in a manner most protective to human health and the environment.

Because counter areas are currently classified as 90-day storage areas, drums located in permitted or interim status storage areas cannot be moved back to 90-day areas to be counted when radiation read-

ings are needed. Therefore, permitting of the counter areas will allow the drums to be transferred to the counting areas.

DOE has requested temporary authorization to operate under the proposed modification to prevent disruption of ongoing waste management activities.

Modification Four is a Class 2 modification, which covers changes needed to enable RFP to manage waste safely and conform to regulations. Modification Four was sent to CDH on January 15, 1992. Class 2 modifications require that within 7 days of the request date, a publication of notice must appear in local newspapers. The 60-day public comment period begins when the notice is published. CDH has 90 days from the modification request date to respond in one of the following ways: 1) approve with or without changes; 2) deny; 3) determine that the request is a Class 3 – not a Class 2 – modification, and start the process over; 4) approve the request as a temporary authorization for 180 days only; or 5) request a 30-day extension and decide at that time. If CDH does not reply within 120 days of the modification request date, the permit modification is automatically approved. CDH must formally respond to all significant comments or questions posed during the 60-day public comment period.

Modification Five

- Train all RFP personnel (including subcontractors) in hazardous waste handling. This change would ensure that everybody working at RFP understands the nature of hazardous waste and the regulatory requirements pertaining to its handling. This training also ensures that employees handling hazardous waste are identified and kept up-to-date in training.
- Provide two types of training. A 1.5-hour training course would be offered to those employees who have no direct involvement in the management of hazardous waste and a 3-hour course would be provided to those employees who work regularly with hazardous waste.

Modification Five is a Class 3 modification that addresses the training section of the RCRA Part B permit. The modification request date was January 29, 1992. Requirements for public comment and notification are the same as for Modification Four. Following the 60-day public comment period,

CDH will prepare a draft permit modification; there is no time limit for drafting this modification. Issuance of the modification is followed by a 45-day public comment period held by CDH. If requested, a public hearing is also held within this 45-day comment period. CDH must reply to all questions and comments for a Class 3 modification. At the end of the second public comment period, CDH must grant or deny the permit modification.

Written comments on Modification Five may be sent to Noreen Matsuura, CDH, 4210 East 11th Avenue, Denver, Colorado 80220, 303-331-4920 until April 4, 1992. Ms. Matsuura can also provide the permittee's compliance history during the life of the permit being modified.

Modification Six

- Consolidate container storage information common to all units into one subsection. This includes definitions and descriptions for inspection methods, container labeling, waste compatibility, and recordkeeping.
- Reference all hazardous or low-level mixed waste as "hazardous." This change will simplify and provide consistency throughout the permit, as it is the hazardous component of the waste that is regulated by the RCRA permit.

Modification Six is a Class 1 modification. Class 1 modifications generally do not need approval from CDH and do not require public comment periods since they do not substantially alter the permit conditions or reduce the capacity of the facility to protect human health or the environment.

Previous Modifications

Earlier permit modifications included clarifications and corrections such as updating types of equipment, updating organizational responsibilities and job titles, providing consistent terminology regarding the use of approved containers, and correcting discrepancies between numbers of containers and total storage volumes.

Information about earlier permit modification requests may be obtained by contacting DOE Public Information Officer Beth Brainard at 303-966-5993. Copies of past modifications are also available in the reading rooms listed on page 4. ■

OU1 French Drain Construction Delays

Unseasonable weather has delayed construction of the OU1 French drain scheduled for completion on March 2, 1992. Geologic conditions have further hindered placement of the drain into the slope.

Unusually heavy snow in November 1991 and again in January 1992, combined with unusually warm temperatures, have hindered the timely completion of the OU1 French drain. The warm weather prompted excessive snowmelt, creating too much water for the clayey soil at OU1 to absorb. This excess moisture caused slippery conditions in the trench dug for the French drain. The slippery conditions made working and operating equipment at the trench dangerous.

To maintain slope stability, trench excavation procedures were modified. The origi-

nal design of the OU1 French drain called for slopes of 40 degrees from horizontal on both sides of the trench. The trench is now being excavated at a more conservative 20- to 30-degree angle from horizontal.

Since the trench is now wider, additional soil must be removed. While the regrading promotes trench stability and increases worker safety, the result is construction delays.

The increased safety measures should allow the project to proceed. However, the French drain construction crew may run into additional slope stabilization problems and delays in the future if the soils remain unusually oversaturated.

When completed, the approximately 2,000-foot-long trench system will collect

contaminated ground water from sources within OU1. The ground water will be pumped to a newly-constructed treatment plant; contaminants will be removed; and treated water will be discharged to the South Interceptor Ditch, which drains into holding pond C-2. This will prevent the migration and release of any contaminated ground water from OU1 to the Woman Creek drainage.

OU1, the 881 Hillside, is being investigated and treated as a high-priority site because of elevated concentrations of volatile organic compounds in the ground water and because of the site's proximity to Woman Creek. Volatile organic compounds are chemicals containing mainly carbon, hydrogen, and oxygen that tend to vaporize at room temperature and can produce toxic effects on body tissues and processes. ■

New Documents

- *Proposed Sanitary Landfill, Rocky Flats Plant*
- *EG&G Rocky Flats Plant Environmental Restoration Program Monthly Report for January 1992*
- *Certificate of Designation Application for New Sanitary Landfill, Rocky Flats Plant*
- *Wetlands Assessment, Rocky Flats Plant Site*
- *Threatened and Endangered Species Evaluation, Rocky Flats Plant Site*
- *Phase II Analysis of Offsite Emergency Planning Zones for Rocky Flats Plant*
- *Background Geochemical Characterization Plan - Rocky Flats Plant*

Public Comment Sought On Proposed Action For 903 Pad

DOE has developed a proposed *Interim Measure/Interim Remedial Action/Environmental Assessment for Operable Unit 2 (OU2) - the 903 Pad, Mound, and East Trenches*. The document describes an approach for addressing subsurface volatile organic compounds and radionuclide contamination that is a source of groundwater contamination within OU2.

Comment Period: March 20 to May 20, 1992
Information Meeting: Tuesday, April 7, 1992
Comment Meeting: Thursday, May 7, 1992
7:00 p.m. to 9:00 p.m.
Denver West Marriott
1717 Denver West - Marriott Boulevard
Golden, Colorado 80401

Drums Contain Soil From Well Drillings

Well drilling activities at OU1, OU2, and other locations at RFP can generate loose soils. To prevent spreading any potential contamination, this excess soil is temporarily stored in metal drums while samples are tested for the presence of contamination. Such drums are located at various drill cutting sites at RFP, including those along the eastern edge of the plant near Indiana Street.

Currently, loose soil is sealed inside a plastic bag 10 mils thick (one mil = 1/1000th inch). The bagged soil then goes into a 110-mil rigid plastic drum liner. Both of these liners are sealed inside a 55-gallon drum. Starting in late March, the loose soil will be packaged slightly differently. The soil will be placed inside a 5-mil plastic bag, which will be sealed inside another 5-mil plastic bag. The double bag will be sealed inside a 30-gallon drum. RFP is changing to the smaller-size drum because such a drum, if found to con-

tain contaminated soil, could be repackaged inside a 55-gallon drum.

Soil from the drill sites is sampled in accordance with the Interagency Agreement.



If no contamination is found, the drums are sent to the on-site landfill for disposal. The emptied drums, which are part of the RFP chemical tracking and control system, are then monitored, cleaned (even with no contamination present), inspected for structural soundness, repainted, relabeled, and reused.

If sampling reveals that the soil in the drums is contaminated, the drums are transferred to Waste Operations and stored elsewhere (on-site) pending treatment and/or shipment to an off-site storage or disposal facility.

Evaluation of drill cuttings is an ongoing process and will continue until remediation of RFP is complete. ■

Public Invited to Use Reading Rooms

The following reading rooms contain current information, technical reports, and reference documents on environmental restoration at the Rocky Flats Plant:

Rocky Flats Public Reading Room*

Front Range Community College Library
3645 West 112th Avenue
Level B, Center of Building
Westminster, Colorado 80030
303-469-4435

Hours:

Monday – Tuesday 12:00 pm – 8:00 pm
Wednesday 10:00 am – 4:00 pm
Thursday – Friday 8:00 am – 4:00 pm

Rocky Flats Environmental Monitoring Council*
1536 Cole Boulevard, Suite 325
Denver West Office Park, Building 4
Golden, Colorado 80401
303-232-1966

Hours:

Monday – Friday 8:30 am – 5:00 pm

EPA Superfund Records Center*
999 18th Street, Suite 500
Denver, Colorado 80202-2405
303-293-1807

Hours:

Monday – Friday 8:00 am – 4:30 pm

*Information Repository

Colorado Department of Health*
Rocky Flats Program Unit
4210 East 11th Avenue, Room 420
Denver, Colorado 80220
303-331-4855

Hours:

Monday – Friday 8:00 am – 5:00 pm

United States Department of Energy
Freedom of Information and Privacy Branch
Office
1000 Independence Avenue, S.W.
Washington, D.C. 20585
202-586-6025

Hours: (Eastern time zone)

Monday – Friday 9:00 am – 4:00 pm

Calendar of Events

- **Rocky Flats Environmental Monitoring Council Meeting (Tentative):** April 28 and May 26, 1992, 7:00 p.m. Please call the Environmental Monitoring Council to verify meeting date and location at 303-232-1966.
- **General Rocky Flats Plant Tours:** April 13 and May 11, 1992. Please call 966-2011 one week in advance for reservations.
- **Public Comment Period on the *Interim Measure/Interim Remedial Action/ Environmental Assessment for Operable Unit 2:*** Comment period from March 20 through May 20, 1992.
- **Public Information Meeting on the *Interim Measure/Interim Remedial Action/ Environmental Assessment for Operable Unit 2:*** April 7, 1992 from 7:00 p.m. to 9:00 p.m. at the Denver West Marriott (see address on page 3).
- **Public Comment Meeting on the *Interim Measure/Interim Remedial Action/ Environmental Assessment for Operable Unit 2:*** May 7, 1992 from 7:00 p.m. to 9:00 p.m. at the Denver West Marriott (see address on page 3).

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