

1) Status of Modified IAG Milestones

Andy Ledford provided a draft list of the IAG milestones for review. Frazer Lockhart explained that there is an approximate 6-month extension to each of the IAG milestones (except for the start of construction). The start-of-construction milestone is extended because ancillary construction (i.e., building demolition) does not count as the start of construction but needs to be performed after approval of the IM/IRA-EA Decision Document and before the Solar Evaporation Pond (SEP) closure commences. Harlen Ainscough requested that the schedule be reviewed in detail so that all parties of the working team understand their expected commitments. This review will occur at the next team meeting. It is planned that the schedule be reviewed in detail at the next meeting.

2) Open Issues Identified by the CDPHE

A) Permit Modification

Harlen Ainscough reported that the IM/IRA-EA Decision Document may be proposed as a DOE-requested Class III RCRA Part B permit modification. This will allow a single, simultaneous public review period for the SEP closure. Once the public review and comment period is over, any substantial changes to the IM/IRA-EA Decision Document would have to be submitted for public review.

B) Verify Phase II RFI/RI Investigation and Report

Harlen Ainscough reported that the Phase II RFI/RI work plan received conditional approval from the CDPHE on October 18, 1994 to implement the field work. The remaining questions/comments involve the Baseline Risk Assessment (BRA) and were not perceived to have an impact on starting the field work.

C) Isotopic vs. Gross Radionuclide Issue

The issue was raised by CDPHE at the August 23, 1994 team meeting concerning why the sludge data taken by isotopic-specific and gross radiation methods were different. The hypothesized difference is that the samples were taken at different times for different purposes and may have had different detection limits. Steve Howard is researching this issue in an effort to confirm the hypothesis. The DOE will prepare a letter stating which data are considered to be appropriate for use (isotopic-specific so that these data could be used for modeling), and why the data are not consistent. The target date for this letter is November 4, 1994.

D) RFETS Low-Level Mixed Waste (OU4) Disposal Criteria vs. Complex-Wide Criteria

Frazer Lockhart indicated that he would like to reduce the effort expended addressing this CDPHE concern because the OU4 criteria for compliance with the Colorado requirements are much more stringent than the general screening complex-wide criteria. The OU4 activity is a closure of an existing surface impoundment whereas the DOE complex is beginning to identify appropriate locations for the disposal of potentially large quantities of radioactively contaminated wastes.

E) CDPHE Radiation Control Position on Low-Level Mixed Waste

It was discussed whether the State of Colorado Part 14 low-level mixed waste landfill siting requirements should be listed as an applicable or relevant and appropriate requirement (ARAR) for the OU4 SEP closure project. Frazer Lockhart stated that federal facilities are exempt from the Part 14 requirements so these requirements would not be ARARs. Harlen Ainscough stated that CDPHE expects that the substantive requirements to be met. A copy of the requirements was provided by Mr. Ainscough for comparison to the closure performance standards and the Part 2 siting requirements, which have previously guided the project.

The question raised by the CDPHE radiation control division concerning headward erosion was discussed. It was agreed that only a qualitative geomorphological assessment should be performed addressing alluvial deposition vs. erosion. Harlen Ainscough stated that the conditions which formed the Rocky Flats alluvial fan were principally depositional, not erosional forces.

The RESRAD issue was discussed. Frazer Lockhart stated that the DOE did not feel it was necessary to formally perform RESRAD for the project because the HELP, VLEACH, and MYGRT models are a more sophisticated set of models. RESRAD is a screening tool to assess the risk from radionuclides. However, RESRAD does not model the risks from metals and nitrates which exist at the SEPs.

Phil Nixon reported that Parsons ES had run the RESRAD model using all the default parameters and had seen a breakthrough of contamination to ground water at 400 years. Mr. Nixon indicated that the modeling should be performed with site-specific input data and be performed in multiple iterations to reflect the different layers of the engineered cover. Frazer Lockhart suggested that the CDPHE RESRAD modeler meet with the Parsons ES RESRAD modelers to discuss the appropriate input parameters and to discuss how to best perform the modeling. This meeting will be set up through Andy Ledford, Harlen Ainscough, and Phil Nixon.

F) Part 2 Siting - Language Omissions

Harlen Ainscough reported that the CDPHE would enhance the language, if necessary, in Section 2.5.5 to clarify that a leachate detection/collection system may be required. Mr. Ainscough is the CDPHE lead with respect to making the modification. Subsequent to the meeting Mr. Ainscough reported that the CDPHE interprets Section 2.5.5 in a manner which specifies that a leachate detection/collection system is not required, but may be considered if necessary. Therefore, the language in Section 2.5.5 does not need to be changed.

G) Community Relations

Harlen Ainscough stated that the working group needs to have a well-defined strategy with respect to interactions with the public. Frazer Lockhart agreed that the working group needs to work on its effectiveness in presenting the project to the Citizens Advisory Board (CAB). Mr. Lockhart pointed out that more time needs to be spent informing the CAB with respect to what alternatives were evaluated and why the proposed alternative was selected. Frazer Lockhart suggested that a summary sheet be developed and inserted into the IM/IRA-EA Decision Document that identifies the alternatives that were evaluated and justifies the selection of the proposed alternative. The fact sheet should address the schedule, cost, and risks associated with each alternative.

Andy Ledford stated that the CAB should be invited to help solve the problems instead of merely identifying issues and concerns. Frazer Lockhart responded that the CAB would likely be willing to be a part of the issue resolution process. Mr. Lockhart suggested that one issue be selected for the CAB to become involved in solving. The OU4 IM/IRA is on the agenda for the next CAB meeting, which is scheduled for November 20, 1994. Mr. Lockhart also stated that the working group should think about alternatives that were not selected and why they were not selected. This might be helpful in addressing public comments. It was mentioned that perhaps a Saturday workshop should be scheduled to present the methodologies and results of the OU4 IM/IRA process to the CAB/public.

H) IHSS 176 Annexation

Harlen Ainscough indicated that the regulatory approval to annex IHSS 176 should be a component of approving the IM/IRA-EA Decision Document. Therefore, separate approval from the agencies will not be necessary.

I) Pondcrete Inclusion

It was discussed that pondcrete would be included in the sections of the IM/IRA-EA Decision Document that addressed sludge inclusion. Phil Nixon presented the strategy that would be taken in the IM/IRA-EA Decision Document with respect to sludge/pondcrete inclusion.

Part I

Introduce Sludge and Pondcrete as Components of IM/IRA

Part II

Sludge Characterization
(data inclusive of sludge and pondcrete)

Part III
(Alternatives for
Treatment/Disposition)

Sludge
(liquid in tanks)

Pondcrete
(solid)

Part IV

Disposition Beneath Engineered Cover

J) 750 Pad

Harlen Ainscough asked what the DOE was planning to do with the 750 Pad after the sludge was removed. Frazer Lockhart answered that the DOE may consider closing the 750 Pad because a DOE goal is to close sites and remove waste. It was noted that closing the 750 Pad would be contingent upon the inclusion of sludge and pondcrete in the OU4 IM/IRA. The closure of the 750 Pad would be separate from the OU4 IM/IRA because logistically the pad could not be closed until the sludge was removed. Sludge removal will be concurrent with the SEP closure waste consolidation activities and the engineered cover will be constructed either before or at the same time the 750 Pad is being closed. It was agreed that the CDPHE would not formally respond to the DOE letter dated May 20, 1993.

K) Dust Suppression on Large Excavation Projects

Harlen Ainscough asked whether any guidance documents had been identified on dust suppression. Phil Nixon reported that no EPA guidance document had been identified on this topic. Frazer Lockhart suggested searching Occupational Safety and Health Administration (OSHA) documents or Mine Safety and Health Administration (MSHA) documents because these groups have studied and addressed problems associated with respiratory dust control. Parsons ES will investigate OSHA and MSHA documentation.

L) Administrative Alternatives to Closure

Harlen Ainscough reported that the Corrective Actions Management Unit (CAMU) court case in New Jersey may be resolved within the next month. When the lawsuit is resolved, CDPHE will assess the impacts to the OU4 proposal. Mr. Ainscough indicated that the AGO attorneys have provided, in draft, recommendations relative to the implementation of CAMU in Colorado

pending resolution of the lawsuit. DOE will be advised of the recommendation when it is finalized.

M) Document Comments

Harlen Ainscough provided preliminary verbal comments on the technical synopsis for the inclusion of sludge into the IM/IRA-EA Decision Document. Mr. Ainscough questioned the equivalency of General Response Action (GRA) II (dewatering/fixation) and GRA V (cementation). Phil Nixon responded that the cost data accuracy for GRA V is higher than for GRA II because the Haliburton equipment for GRA IV already exists with known data. There is a wider range of data for the dewatering/fixation alternative (GRA II). However, the process equipment for the two alternatives is very similar. Harlen Ainscough requested that the reasons for selecting GRA II over GRA V be covered in greater detail with enhanced justification. Tom Peters commented that the EPA considers the technical synopsis to be too repetitive to the existing Part III. Phil Nixon responded that the technical synopsis was being integrated into Part III instead of being submitted as a separate document which is equivalent to Part II (specific for sludge/pondcrete) to reduce the level of redundancy.

A handwritten signature in cursive script, reading "Philip A. Nixon", is written over a horizontal line.

Philip A. Nixon