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HEALY T J		
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SCHUBERT A L		
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Busby W X
 O'Rourke T X
 Hutchins M X
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Reviewed for Addressee
Corres Control RFP

9-17-93
DATE BY

Ref Ltr #

DOE ORDER # 5400



Department of Energy

ROCKY FLATS OFFICE
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GOLDEN COLORADO 80402 0928



AUG 16 1993

Mr Martin Hestmark
 U S Environmental Protection Agency, Region VIII
 ATTN Rocky Flats Project Manager, 8HWM-RI
 999 18th Street, Suite 500, 8WM-C
 Denver, Colorado 80202-2405

Mr Gary Baughman
 Hazardous Waste Facilities Unit Leader
 Colorado Department of Health
 4300 Cherry Creek Drive South
 Denver, Colorado 80222-1530

Gentlemen

Enclosed for your files are two copies each of the meeting minutes from the September 3, 1993, re-scoping meeting for Operable Units 7 and 11 at the Rocky Flats Plant

If you have any questions, please call Robert H Birk of my staff at 966-5921

Sincerely,

Richard J Schassburger
 Acting Director
 Environmental Restoration Division

Enclosure

cc w/Enclosure
 A Rampertaap, EM-453
 B. Brainard, OPA, RFO
 Administrative Record

cc w/o Enclosure
 W Busby, EG&G
 T O'Rourke, EG&G
 A Duran, EPA
 D Maxwell, EPA
 J Schieffelin, CDH
 D Norberry, CDH

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 EG&G
 ROCKY FLATS OFFICE
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1 of 6

Meeting Minutes For Re-Scoping Of Operable Units 7, Present Landfill, and 11, West Spray Field.

Meeting Date: 3-September-93

Location. Interlocken, Large Conference Room.

Meeting Participants:

Colorado Department Of Health

Joe Schieffelin

Dave Norberry

Environmental Protection Agency

Arturo Duran

Department Of Energy, Rocky Flats Office

Robert Birk

EG&G, Rocky Flats

Tim O'Rourke

Kelly O'Neill

S. M. Stoller Corp.

Greg Davis

Operable Unit 11, West Spray Field. (OU-11) Issues

EG&G summarized the proposal to integrate both phases of field work into a comprehensive investigation designed to support a final action. This final action would be summarized in the form of a corrective measures study. CDH stated that in general, the response to the proposal submitted by DOE was positive. CDH feels that as is, the hybrid process incorporating CERCLA requirements into the RCRA closure process per the IAG has been problematic.

CDH proposed an alternative approach essentially re-starting the process for OU 11 through the development of a closure plan rather than revision of the Phase I Work Plan and development of an IM/IRA decision document. CDH felt that this may be the optimum time to make a clean break from the IAG process which may save time in the long run. EG&G pointed out that although this was a workable alternative, this would require an additional public comment period for the closure plan and may not be the optimum approach from a schedule standpoint. EG&G stated that revising the work plan via technical memorandum (TM) would allow site characterization to begin sooner. In addition, the closure plan process could be incorporated into the TM format

EPA concurred that the EG&G proposal should be acceptable provided that

the endpoint meets closure plan decision criteria. EPA suggested incorporating the TM for field work into the closure plan at a later date. This would allow concurrent field work and closure plan development.

CDH pointed out that risk assessment requirements for a closure plan would be less extensive than the current IAG requirements.

CDH feels either process can be designed to obtain the final objective of evaluating current site conditions, determining if site data exceeds background levels or detection limits for non-background elements, and determine if further actions are necessary or if clean closure is obtainable. CDH stated that they would approve either option EG&G and DOE proposed. All parties concurred with the objective for the OU 11 process and further concurred that the most effective option, from a cost and schedule standpoint would be acceptable.

EG&G agreed to research in detail both options and make a recommendation to DOE for transmittal to the agencies.

EG&G explained that future milestones would be significantly impacted by this re-scoping. The near future milestone for the Phase I RFI/RI Report most likely would not be met while many of the outyear milestones would be accelerated or deleted.

CDH stated that although it fully supported this effort, schedule impacts resulting from delays in past funding or prioritization would still be the responsibility of DOE. CDH further stated that new scope or changes in scope were justification for milestone extensions

OU 11 Summary

All parties concurred that the objectives for closure stated above were accurate.

All parties concurred with integrating both phases of field investigations into a single phase. Further, it was agreed that revising the work plan via TM would be the most practical approach from a scheduling standpoint.

All parties concurred that EG&G and DOE would further research which option might be the most effective approach to obtain closure and

recommend this approach to the agencies by means of an informal meeting prior to formal submittal to ensure all parties are satisfied.

CDH and EPA agreed to provide their concurrence in writing to DOE.

OU 7. Present Landfill. (OU 7). Issues.

The proposal was summarized for the agencies. Briefly, this included: 1. Remove the baseline risk assessment from Phase I activities since it was proposed that the BRA no longer drive the IM/IRA. Closure activities are driven by the Colorado Hazardous Waste Act closure requirements and supported by EPA guidance on presumptive remedies. This would streamline the IM/IRA decision document. 2. Allow revision of the Phase I Work Plan to incorporate an assessment of all pathways rather than only Phase I pathways. This would allow deletion of the Phase II Work Plan.

EPA and CDH both agreed that the BRA was not necessary to decide to remediate OU 7. Closure criteria would be ARARs rather than risk.

Significant discussion occurred regarding the BRA. CDH recommended that the BRA be performed post closure as a performance measurement for closure.

Both agencies agreed that additional field activities to assess the groundwater pathway should be performed prior to closure to support closure design. CDH recommended that the Phase I Work Plan not be modified. CDH felt that any additional field work could be documented in the IM/IRA decision document so that the IM/IRA would not be delayed. EG&G pointed out that the most effective means, from a scheduling standpoint, would be to modify the work plan and perform field activities concurrently with IM/IRA Decision Document development. CDH's final position was that they did not have a strong preference how the field activities were to be implemented as long as no impacts to the IM/IRA Decision Document occurred.

EPA and CDH stated that closure criteria should be based upon ARARS. Once ARARS have been met, the site is considered closed and that ARARS take precedence over risk in this case

CDH would like to see Phase I data presented as an informal document. At this time however, CDH does not want to eliminate the Phase I RFI/RI report milestone. CDH feels that this milestone will not be needed but that the current schedule freeze due to background comparison issues should suffice until the OU 7 schedule can be modified in detail. CDH and EPA both recognize that the baseline on which the original IAG Table 6 milestones were developed has changed significantly. All parties further recognized that impacts from the change in baseline will impact the current schedule assumptions and eventually require modifications to Table 6 milestones.

CDH inquired as to the final disposition of the landfill pond. All parties agreed that the pond would not be adequate to serve as part of the final IM/IRA due to its design. One of the concerns is that the pond's proximity to the landfill makes installation of an alternative leachate collection system difficult without prior closure of the pond. The project manager from S. M. Stoller felt that, based on Phase I data, there was a good chance that the sediments in the pond would have to be remediated and this would further complicate the issue. It was pointed out by EG&G that ecotoxicological tests run on the sediments indicated no adverse ecological effects but this does not correspond to human health risk.

CDH was interested in the status of the construction of the new landfill. Their position on this is that they full expect to see closure of the Present Landfill in accordance with the IAG. CDH and EPA both stated that they do not recognize NEPA as a constraint to opening the new landfill particularly in the case of the construction schedule being impacted by an EIS. Both agencies felt that the current CERCLA/RCRA process met NEPA procedural guidelines.

EG&G stated that resolution of issues pertaining to comparison of site specific data to background values and data aggregation was still critical to OU 7 schedule.

OU 7 Summary.

All parties agreed that the baseline risk assessment would not be necessary until post closure.

All parties agreed it was acceptable to modify the Phase I Work Plan via

TM to support a comprehensive, full pathways field investigation.

In addition to field sampling requirements, data completeness will be addressed in the TM. This will include an assessment of current data.

An informal presentation of the Phase I data will be presented to the agencies prior to transmittal of the TM. At this stage the necessity of a Phase I RFI/RI report will be re-evaluated. The agencies felt that this should suffice to eliminate the Phase I RFI/RI report milestone.

CDH and EPA agreed to provide their concurrence in writing to DOE.