

OU15 Meeting Summary

Meeting Location, Date and Time:

EPA Region VIII Headquarters, Denver, CO, Montana Room
October 5, 1994
8:30 AM - 10:00 AM

Meeting Attendees:

Arturo Duran (EPA)
William Fitch (DOE)
Linda Guinn (EG&G)
Roland Hea (ERM-RM)

Dick Hyland (RTG/DOE)
Rich Ray (EG&G)
Carl Spreng (CDPHE)
Jeff Swanson (CDPHE)

Meeting Summary:

Meeting commenced at 8:30 AM.

Arturo Duran and Carl Spreng were introduced as the new OU15 project managers for EPA and CDPHE, respectively. In addition, Rich Ray stated that he was in the process of assuming the day to day (e.g., budgets, schedules, etc.) responsibilities for OU15 as the EG&G project manager. Dennis Schubbe will stay involved in the technical aspects of OU15 as the overall project lead.

William Fitch gave a brief history of OU15 and described the investigations that have been completed as part of the RFI/RI. Rich Ray and Roland Hea assisted in this presentation, and provided specific information on the sampling methodology and results. William Fitch indicated the only possible RCRA concern was the detection of butyl benzyl phthalate in IHSS 178 at a parts per billion level. Jeff Swanson said that CDPHE does consider the phthalate compounds detected in the hot water rinsate samples to be contaminants of concern, since they are not related to the wastes managed in the IHSSs. He added that CDPHE will not consider these compounds with respect to the clean closure performance standards.

William Fitch stated that EG&G was in the process of preparing a preliminary draft Proposed Plan for OU15, and that it would be ready for distribution to EPA and CDPHE in late October. Arturo Duran and Jeff Swanson both expressed concern that a Proposed Plan might be premature at this point. Arturo Duran asked for a brief overview of the approach being used for evaluating OU15 and determining the need for further action.

Arturo Duran said that he felt the most significant OU15 issue was what to do about IHSS 204, the Original Uranium Chip Roaster. All agreed that the radiological contamination associated with IHSS 204 was the major concern within OU15. Arturo Duran stated that EPA would not stop DOE from continuing to operate the Chip Roaster for processing radiological materials, and that EPA would not dispute DOE's occupational radiation protection standards and procedures. He added that the best course of action might be to defer the decision on IHSS 204 and deal with it under a program such as D&D. Dick Hyland stated that IHSS 204 could potentially be dealt with under the NCPP program, which will be using occupational standards for cleanup.

Arturo Duran felt that it would be useful to have additional meetings prior to the submittal of a Proposed Plan, and that he wanted to continue to maintain the cooperative spirit already established on OU15. William Fitch asked how the decision documents for OU15 should be structured given the RCRA and radiological results discussed in the meeting. Jeff Swanson stated that the decision document could not be called a No Action ROD if it included institutional controls. Arturo Duran felt that there was some flexibility in the process.

Linda Guinn reiterated that there had been no releases to the environment from the OU15 IHSSs, and added that OU15 had been included in the IAG as a RCRA closure with CDPHE as the lead agency. Arturo Duran said that it would be difficult to tackle the broader questions of CERCLA jurisdiction. He gave an example of a similar situation that had occurred at OU9, with a unit that was needed for continued operation.

Jeff Swanson suggested that a streamlined FS might make sense to evaluate alternatives and do a cost/benefit analysis on each. Arturo Duran indicated that the site might not warrant an FS. Jeff Swanson said it should not be a classical FS, but instead should be compact and layout the options. He added that this would help document why options like tearing up IHSS floors would not be appropriate. Arturo Duran agreed that this might be necessary for non-No Action decision documents. Linda Guinn suggested that perhaps this evaluation of alternatives could be accomplished in a strategy paper.

Arturo Duran reiterated that it might make sense to defer the decision for IHSS 204. He explained how 2 of the OU16 IHSSs had been moved to other OUs, allowing the remaining 5 IHSSs to be closed out under a No Action decision. Linda Guinn stated that EG&G/DOE would evaluate the various possibilities and come back to EPA and CDPHE with a proposal to address the issues.

Dick Hyland said that DOE's original intent had been to submit a draft Proposed Plan to EPA and CDPHE with the Final RFI/RI Report on January 4, 1995, along with a pre-decision draft this October. Arturo Duran asked if the overall OU15 process could be expedited. He indicated that if the Draft RFI/RI Report was acceptable it could be given conditional approval, thereby eliminating the need for the Final. Any outstanding issues could be dealt with in a Proposed Plan. William Fitch stated that work was already well under way in preparing the Final RFI/RI Report and that its submittal was identified as an IAG milestone. Arturo Duran said that the IAG

milestone could be changed with a letter from EPA and CDPHE.

Jeff Swanson cautioned that it might not be appropriate to expedite the project, especially in light of the fact that CDPHE had submitted comments on the Draft RFI/RI Report in a few weeks, and that EPA had still not been able to provide any. He felt that given the change in project managers, EPA first needed time to get up to speed on the OU15 project. Arturo Duran recognized the delays in commenting on the Draft RFI/RI Report, but felt schedule time could be made up.

William Fitch suggested that it might be useful to go ahead and make the changes on the Report, since the process was already underway. He added that DOE will provide EPA and CDPHE a letter-type report evaluating the alternatives for additional action on OU15, hopefully before the end of the year. Jeff Swanson raised the question of whether the IAG required an FS for OU15. Dick Hyland suggested again that IHSS 204 could be addressed under the IM/IRA being developed for NCPP.

Meeting adjourned at 10:00 AM.