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Department of Energy
Rocky Flats Field Office

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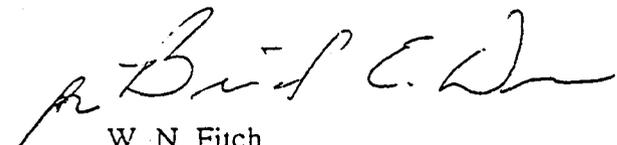
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BLINGAME, A.H.		
BNIVAL, G.J.		
BDOVA, R.C.		
BIS, J.G.		
BVN, T.M.		
BRERA, D.W.		
BRAY, R.E.		
BUS, J.A.		
BURTIN, J.T.		
BUTHER, B.		
BOWER, W.S.		
BLAN, P.M.		
BALY, T.J.		
BAHL, T.G.		
BIG, J.G.		
BLOWELL, L.J.	XX	
BKSON, D.T.		
B.L. R.E.		
BWEBER, S.A.		
BX, G.E.		
BART, D.		
BONALD, M.M.		
BGOVERN, L.J.		
BKENNA, F.G.		
BKERT, J.G.		
BZUTO, V.M.		
BTERWHITE, D.G.		
BHRADER, D.C.		
BHUBERT, A.L.		
BGER, S.G.	X	
BROBEL, G.L.		
BARNER, K.A.		
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Operable Unit 15, Document Transmittal for Inclusion in the Administrative Record

Dennis L. Schubbe
Operable Unit 15 Project Manager
EG&G Rocky Flats, Inc.

The purpose of this memorandum is to convey copies of the Synopsis of the Department of Energy's (DOE's) April 24, 1995, meeting with the Colorado Department of Public Health and Environment (CDPHE) and the Environmental Protection Agency and the CDPHE's letter also dated April 24, 1995, to EG&G for inclusion in the Administrative Record for Operable Unit 15.

If you have any questions please contact me at extension 4013.


W. N. Fitch
Manager, Operable Unit No. 15

Attachments

cc w/o Attachment:
J. Roberson, AMER
F. Lockhart, DAMER
J. Wienand, DOE
S. Stiger, EG&G

CORRES. CONTROL	X	X
DOMN RECORD/080		
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Reviewed for Addressee
Corres. Control RFP

5/11/95 *Cml*
DATE BY

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DOE ORDER # 5400.1

ADMIN RECORD

FINAL

MEETING to DISCUSS EPA's and CDPHE's COMMENTS
CONCERNING the "DRAFT PROPOSED PLAN and DRAFT
MODIFICATION of the COLORADO HAZARDOUS WASTE PERMIT
for the
ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE
OPERABLE UNIT 15: INSIDE BUILDING CLOSURES"

April 24, 1995

ATTENDEES

<u>NAME</u>	<u>PHONE</u>	<u>FAX</u>
W. Fitch, DOE/ER	966-4013	966-4871
A. Duran, EPA	294-1080	294-7559
M. Aguilar, EPA	293-0954	294-7559
R. Heeneke, EPA	294-1126	294-7665
C. Spreng, CDPHE	692-3358	759-5355
R. Hyland, RTG	966-2136	966-4728

SYNOPSIS

Personnel from the EPA, CDPHE and DOE/RFFO met this date to Discuss EPA's and CDPHE's comments concerning the "Draft Proposed Plan and Draft Modification of the Colorado Hazardous Waste Permit for the Rocky Flats Environmental Technology Site Operable Unit 15: Inside Building Closures." The following is a brief synopsis of this meeting, which commenced at approximately 9:10 AM on April 24, 1995, at the EPA Region VIII - Conference Center, Wasatch Room - Denver, CO.

Dr. Fitch opened the meeting and presented the EG&G accelerated schedule for the Closure of OU-15. Dr. Fitch stated that according to the EG&G schedule, it appears that we are roughly four days behind with respect to the comment and resolution activity of the DPP/DRPM.

Mr. Duran said that he believed that the DPP could be pushed through EPA and that official comments could be available by the end of the week and that he then could run it through EPA senior management. The official comments that would be available at the end of the week would be those resulting from his review and that these comments could be discussed and resolved at this meeting such that they could be incorporated into a new revised version of the DPP and that this new and revised version of the DPP could be the one presented to EPA senior management. Mr. Duran felt certain that the presentation of a smooth revised copy of the DPP would go much quicker through EPA than one that would be marked-up. Mr. Duran then asked Mr. Fitch if DOE could produce a new revised copy of the DPP by April 25, 1995, so that he could start the internal EPA senior management process ASAP thereafter.

Dr. Fitch said that DOE would try to do this.

Mr. Spreng said that the State had no comments on the DPP and that he would send a letter to DOE to this effect and stated that he would be out of town for approximately two weeks commencing April 26, 1995 and requested that in order to speed things up that the EPA submit their comments directly to DOE.

Dr. Fitch requested that the Public Comment Period be reduced to 30 days.

Mr. Heeneke stated that CERCLA allowed for a 30 day comment period and that from a CERCLA standpoint the 30 days appeared to be satisfactory.

Mr. Duran stated that the IAG may need to be looked at to see if any additional criteria relative to the Public Comment Period duration exists.

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Mr. Spreng stated that RCRA requires a 45 day period for Public Comment.

Dr. Fitch said that a 45 day duration would be satisfactory if the IAG does not require more. The IAG will be looked at to determine if 45 days will be satisfactory, if so then DOE would like to limit the Public Comment Period to 45 days.

At this point in time Mr. Heeneke and Mr. Duran provided their comments to the DPP. These comments have been consolidated and are included on the attachment to this Synopsis.

The meeting was adjourned at approximately 10:50 AM.

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Attachment to OU-15 Meeting Synopsis dated April 24, 1995.

EPA Comments to the Draft Proposed Plan and Draft Modification of the Colorado Hazardous Waste Permit for the Rocky Flats Environmental Technology Site Operable Unit 15: Inside Building Closures, dated April 7, 1995

At a meeting held April 24, 1995 at EPA Region VIII between EPA, CDPHE and DOE to discuss and resolve comments concerning the subject document, Mr. A. Duran and Mr. R. Heeneke provided comments to the DPP/DRPM. Subsequent to this meeting, Mr. C. Spreng, CDPHE provided two comments to Dr. Fitch via telephone. All of the Regulatory Agencies comments are included below.

GLOBAL CHANGES:

The DPP/DRPM is primarily prepared for the public and, as such, should be oriented so that the public can easily read and understand it. To this end the EPA recommended that the acronyms be minimized, specifically the terms "IHSS" and "RFETS" were identified.

A format change was requested that has to do with current U.S. business document practice. EPA recommended that the use of the "," before the word "and" in situations, where it is not absolutely required grammatically, be dropped. Although, the document, as written, is not wrong in the true sense of the proper usage of the English language.

SPECIFIC CHANGES:

Page 1, Col. 1, para. 4, 3rd sentence

Change "... throughout the document ..." to read "... throughout this document ..."

Page 1, Col. 2, para. 1

Change "(2)" to read "a No Action CERCLA decision for ..."

Add the following sentence at the end of the present paragraph.

"Closure certifications for the six IHSSs, document, signed by an independent registered professional engineer, have already been submitted to CDPHE."

Page 1, Col. 2, para. 2

Change "... at IHSSs 178, 179 180, 211, and 217 under their current land use." to read "... at IHSSs 178, 211 and 217 under their current use."

Page 1, Col. 2, para. 3, 1st sentence

Change "At IHSS 204, no ..." to read "At IHSSs 179, 180 and 204, no ..."

Page 2, Col. 1, para. 1, 1st sentence

Change "... a No Action decision ..." to read "... a No Action CERCLA decision ..."

Page 2, Col. 1, para. 1, 3rd sentence

Change "... a No Action decision ..." to read "... a No Action CERCLA decision ..."

Page 2, Col. 1, para. 2

Delete the first two sentences entirely.

Change the new first sentence (formerly the third sentence) to read as follows:

"IHSSs 179, 180 and 204 are located within radiation control areas and are subject to the radiological control program requirements."

FINAL

Page 2, Col. 1, para. 2 (continued)

Change the new second sentence (formerly the forth sentence) to read as follows:

"While the Rocky Flats radiological control program is in effect, these IHSSs require no further action under CERCLA."

Delete the last sentence entirely.

Page 2, Under "Information Repositories"

Change the information for the U.S. Environmental Protection Agency as follows:

"U.S. Environmental Protection Agency
Superfund Records Center
5th Floor
999 18th Street
Denver, CO 80202-2466"

Page 3, Col. 1, para. 1, 3rd sentence

Change the third sentence to read as follows:

"DOE's former mission at Rocky Flats was to produce components for nuclear weapons."

Page 4, Col. 1, Under "SUMMARY OF SITE RISKS" Last line

Change the last line to read "... and second, evaluating the ..."

Page 4, Under "What are ARARS?"

1st para., 2nd sentence

Delete the word "cleanup."

2nd para., 2nd sentence

Define "CCR" just as you have done for "CFR."

Page 5, Col. 1, 2nd para.

Change the first sentence to read "IHSSs 178, 211, and 217 meet ..."

Change the third sentence to read as follows:

"IHSSs 179, 180 and 204 are located within radiological control areas, and subject to the procedures presented in the shaded box below."

Page 5, Col. 1, 3rd para.

Change the first sentence to read "... external to the buildings containing the OU-15 IHSSs."

Replace the second sentence in its entirety as follows:

"The radiological control program for IHSSs 179, 180 and 204 will assure that no contaminants are released from the buildings."

Change the third sentence to read as follows:

"Therefore, these three IHSSs pose no risk to human, plant and other populations outside of their respective buildings."

Page 5, Col. 2, "SUMMARY OF REMEDIAL ALTERNATIVE"

1st para.

Change "2)" to read "a No Action CERCLA decision for IHSSs ..."

Page 5, Col. 2, "SUMMARY OF REMEDIAL ALTERNATIVE" (continued)

2nd para.

Add the following sentence between the present 1st and 2nd sentences.

"Closure certifications for the six IHSSs, document, signed by an independent registered professional engineer, have already been submitted to CDPHE."

Change the new third (former second) sentence to read "The No Action CERCLA decision for . . ."

3rd para. and continuing to page 6, top para.

Change the first sentence to read "IHSSs 179, 180 and 204 are within radiologically controlled areas at Rocky Flats and actions . . ."

Page 6, Col. 1

Delete the first two existing complete paragraphs in their entirety.

Page 6, under "GLOSSARY"

Delete the entry for "Ecological Receptors."