

OPENING REMARKS

Governor Roy Romer described the council as a "tough-minded group for a tough order." He challenged the council to "protect people, and yet make it possible for industry to create new substances and uses but do that in a way that does not endanger people and the environment.

Congressman David Skaggs stressed that the council's work must emphasize accurate information and impartial reviews. He cited the importance of involving interested citizens in the work of the council.

Rocky Flats Area Manager Albert Earl Whiteman and Rockwell International's Rocky Flats President Dominick Sanchini pledged the cooperation of their staff in the work of the council.

ROCKWELL PRESENTATION

Rockwell environmental programs staffer Kirk McKinley outlined the field research and cleanup plans at the plant. His presentation is outlined in accompanying charts "RCRA/CERCLA PROGRAM OVERVIEW" (referring to the Resource Conservation and Recovery Act and the Comprehensive Environmental Response, Compensation, and Liability Act--two of the primary acts governing cleanup programs at sites like Rocky Flats).

Further details on Rocky Flats cleanup plans are found in the document entitled Comprehensive Environmental Assessment and Response Process (CEARP) Phase I. Copies of the overview and CEARP I are available.

EPA/Nat Miullo

EPA activities governed by Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), by the Superfund Amendment Reauthorization Act (SARA), and by the Resource Conservation and Recovery Act (RCRA). These are outlined in the three pamphlets from EPA (the various acts are outlined on page 30 of the green pamphlet). Very basically, CERCLA and SARA cover contamination from old discontinued activities and RCRA covers ongoing operations. Since Rocky Flats includes both, it is covered by both.

Mixed waste, the combination of hazardous and radioactive materials is pointly regulated by the Atomic Energy Act and RCRA. EPA is seeking to avoid redundant authority and requirements through agreements with the Nuclear Regulatory Commission, the Department of Energy, and the Colorado Department of Health.

EPA must follow CERCLA as its first priority, but continues to integrate its requirements with RCRA. Some RCRA authority has

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

ADMIN RECORD

11 11 11 11

been delegated to the State of Colorado (health department).

Some radionuclide air contaminant provisions are also found in the Clean Air Act and toxic air standards are proposed in the CAA.

COLORADO DEPARTMENT OF HEALTH (CDH)/Mike Sattler

Mike outlined some history and authorities affecting Rocky Flats. 11/84 Colorado was granted partial RCRA authority for Rocky Flats. 4/85 The plant submitted to CDH its "Part B" application for handling hazardous materials under RCRA. CDH issued their outline of application deficiencies in a "notice of intent to deny," including:

- need clarification on hazardous/mixed waste handling
- need better waste characterization
- need better tracking of waste streams
- need better information about effects of past practices on current operations

7/86 Compliance agreement on hazardous waste, including low level mixed waste, was reached among EPA, DOE, and CDH.

Expected CDH calendar for permits under this agreement includes: 6-7/88 draft permit for hazardous waste handling (not including incinerator proposal)

This will be followed by permit modifications, closure plans, post-closure plans, and corrective action plans. Each step will include extensive public review and comment opportunities.

Other issues to be handled by CDH (with EPA) include:

- Mixed waste incinerator proposal/trial burn decision
- Transuranic (TRU) handling permit application expected 7/88
 - There is still disagreement about what is covered by state authority
- Determination of cleanup standards (how clean is clean? where is standard measured?)
- Risk assessments on-site and off-site

CITIZENS AGAINST ROCKY FLATS CONTAMINATION/Tom Rauch

Tom outlined background and history of plant operations in general, and then reviewed instances of environmental contamination and safety problems, including:

- Fires in the plant
- Leaking barrels of mixed waste
- Disposal trenches
- Groundwater threats from plumes of contaminants

COMMENTS AND QUESTIONS FROM COUNCIL AND CITIZENS

Need for epidemiological studies of citizens near the plant.
Provide list of council members to the public.

Suggested arrangement for citizen speakers:

- 10-30 minutes for solicited presentations
- 3-5 minutes for spontaneous presentations or questions
- Provide time for questions and comments after each agenda item.

Suggested topics for council attention:

- Epidemiological studies
- Overall cleanup progress
- Environmental effect on surrounding area
- Economic effect on surrounding area
- non-DOE regulation of plant activities
- Worker safety
- Alternatives to the incinerator
- Alternatives to plowing to mediate soil contamination
- Add Ralston Reservoir to monitoring system
- Use DOE money for council expenses
- Clarify confusing information on background levels

PROCEDURES

Council agreed to meet the last Tuesday evening of each month (except for the next meeting, scheduled for March 1). Presentations are to be solicited from sources other than the plant and the regulating agencies. Regulatory schedule needs to be outlined concisely. Reserve some funding for invited outside expert presentations.

INFORMATION AND TOPICS FOR NEXT MEETING

- History and chronology of contaminated sites evaluation
- Details of the compliance agreement
- General historical perspectives
- General Accounting Office information about the plant
- Recent change in EPA/CDH authority sharing at the plant

IDEAS FOR COUNCIL MEETINGS/ACTIVITIES

o Similar to tonight's meeting, each month the council will be a forum for the Colorado Department of Health's monthly update on permit activities.

o In order to monitor PCRA/CECLA activities the Council will need to hear presentations on new activities, documents, studies and findings which impact the progress of the part B permit, CEARP, and the Compliance Agreement. These presentations should be triggered by the release of such documents as the PI/FS studies. Some of the higher priorities in the next few months likely will include, Hillside 881, the 901 Pad, and PI plans for other waste units. The Health Department currently is trying to solidify a schedule of events, which could help to determine the schedule of presentations. The council may want to remain flexible and schedule presentations when a significant document must be reviewed.

o Last, there are numerous other more general issues which may warrant devoting a major portion of an evening to an expanded discussion because of interest in the community. Below is a list of possible topics.

Many of the topics below may not be addressed adequately in one meeting, but could warrant additional research or meetings.

March, 1988	Current environmental management and monitoring program at the facility.
April, 1988	Off-site contamination. soil, water and air
May, 1988	Health risk assessments: The current state of information on health risks associated with plant activities.
June, 1988	Incineration of mixed hazardous and radioactive wastes. The trial burn.
July, 1988	Emission Standards how safe is safe
August, 1988	Appropriate Regulatory Authority: Federal, state, local; National legislation regarding federal facilities.
Oct, 1988	Waste management operations today and in the future
Sept, 1988	Worker health and safety

A combination of the above three activities in one evening may be ambitious. One option is to consider the use of subcommittees, which enlist council members, volunteers and experts to package a presentation on a featured topic. Several months advanced planning will provide the council with adequate time to put together a useful, informative meeting.