

April 27, 1995

Mr. Tom Looby
Director, Office of Environment
Colorado Department of Public Health and Environment
4300 Cherry Creek Dr. South
Denver, CO 80222-1530

Mr. Jack McGraw
Deputy Regional Administrator
U.S. Environmental Protection Agency
Region VIII
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Mr. Mark Silverman
Plant Manager
U.S. Department of Energy
Rocky Flats Field Office
P.O. Box 928
Golden, CO 80402-0928

Re: Initial Recommendations Regarding the Environmental
Restoration Baseline

Dear Gentlemen:

The QAT has begun to evaluate priorities within the Environmental Restoration (ER) program in light of the revised programmatic priorities and assumptions. It is our understanding that if our recommendations are acceptable to you, this evaluation will be utilized to support the development of a sitewide integrated baseline.

The QAT believes that construction of on-site disposal cells, including both Corrective Action Management Units (CAMU) and Permitted RCRA Subtitle C Hazardous Waste landfills, could facilitate the ER program and the cleanup of the plant generally. As such, the QAT recommends that DOE undertake an in depth cost/benefit evaluation of this possibility, in concert with EPA, CDPHE and its stakeholders. As you will recall, on-site disposal is an issue that we feel needs further discussion among the stakeholders.

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ADMIN RECCRD

SW-A-003561

It is also our opinion that there could be substantial cost savings associated with the closure of the Solar Ponds if an on-site alternative CAMU or permitted disposal facility was available. Currently, plans for closure of the Solar Ponds include disposal of hazardous waste at the Solar Ponds and construction of a 1000 year cap. Rather than potentially having multiple hazardous waste disposal sites, the hazardous waste from the Solar Ponds could be placed in the new disposal facility. If hazardous waste were not to be disposed as part of the Solar Ponds closure, it appears that the Solar Ponds could be closed without invoking the siting requirements. The Solar Ponds could then proceed through a more conventional and less expensive closure.

In addition, the new disposal facility could be designed to facilitate retrieval of waste if retrieval ever becomes necessary. The QAT recommends that the impact and affect on the Solar Ponds closure be evaluated as part of the in depth on-site disposal cost/benefit evaluation. If it turns out that there is substantial general site and Solar Ponds benefit associated with the construction of on-site disposal cells, the QAT believes that funding presently allotted to the Solar Ponds project should be redirected to fund other activities including development of the on-site disposal facilities. Since there is significant FY 96 funding allotted to the Solar Ponds, this evaluation needs to be completed as soon as possible.

The evaluation should consider the siting studies already completed for the solid waste landfill presently being constructed on plant site. It is our understanding that this study indicated that the area presently being developed for solid waste could be expanded to accommodate new cells and that Operable Unit 11 may also be adequate for development as a landfill. The QAT believes that the development of new landfill cells in OU 11 could be linked to the Western Aggregate proposal to mine gravel in the buffer zone and thus may provide further overall benefit to the environmental program at RFETS. Overall benefit could be achieved by allowing Western Aggregate to mine areas in OU 11 in exchange for the proposed areas in Rock Creek, thus preserving Rock Creek. In addition, although timing constrained, the mining operation could coordinate the excavation to allow the mined areas to be developed for the landfill cells.

If you have any questions regarding this recommendation, please contact your staff representatives on the QAT. They can coordinate a joint presentation if you find it necessary. We believe that if you accept or wish to further consider this proposal, it might be appropriate to present these ideas at the summit meeting to be held May 1, 1995, for preliminary feedback.

Additionally, if you accept this recommendation, you may wish to consider forwarding a joint principals letter to Mr. Grumbly requesting that the RFETs budget for FY 96, 97 and 98 not be commensurately decreased as a result of redirecting the Solar Ponds project, and more efficiently allotting money to address the plant priorities.

The QAT

Linda Quinn

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Joe Skiff Gary Brinkman
(by Φ)