49305

PARSONS ENGINEERING SCIENCE, INC.
1700 Broadway, Suite 900 Denver, Colorado 80290
phone: (303) 831-8100 • telecopy (303) 831-8208

MEETING MINUTES

TO: Distribution **DATE:** December 15, 1994

FROM: Philip A. Nixon **PROJECT:** Solar Ponds IM/IRA

MEMO #: SP307:121994:02

ATTENDANCE:

Phil Nixon, Parsons ES
Harlen Ainscough, CDPHE
Frazer Lockhart, DOE
Andy Ledford, EG&G
Eileen Jemison, EG&G
Arturo Duran, EPA
John Haasbeek, ERM
Lee Pivonka, G&M
Steve Howard, SAIC/DOE
Scott Surovchak, DOE

DISTRIBUTION:

Randy Ogg, EG&G
Mark Austin, EG&G
Michelle McKee, EG&G
Steve Keith, EG&G
Steve Cooke, EG&G
Toni Forbes, EG&G
M. Matthews, EG&G
(Admin. Record) (2)
Peg Witherill, DOE/SAIC
Jeff Ciocco, DOE
Jesse Roberson, DOE
Bob Siegrist, LATO
Eric Graham, ERM
Alan McGregor, ERM
Marcia Dibiasi, IGO
P. Breen
B. Cropper
W. Edmonson
T. Evans
J. Hartfelder
H. Heidkamp
R. Henry
M. Hill
P. Holland
S. Hughes
D. Kennedy
R. Lux
R. McConn
D. Myers
P. Nixon
A. Putinsky
R. Stegen
S. Stenseng
R. Schmiermund
T. Kuykendall
R. Wilkinson
Central Files

SUBJECT: Weekly Status Meeting

1) Citizens Advisory Board Subcommittee Meeting

Frazer Lockhart indicted that he planned on presenting the alternatives risk summary sheet to the Citizens Advisory Board (CAB). In addition, he intended to go over the DOE responses to the subcommittee's comments on the Draft Proposed IM/IRA-EA Decision Document. There will also be a general question and answer period. The CAB meeting is December 15, 1994 at 7:00 pm at the Westminster city facility.

2) Joint Working Group Meeting Minutes as a Part of the Administrative Record

It was agreed that the Meeting Minutes from the working group weekly team meetings were appropriate for submittal to the administrative record.

(I:\PROJECTS\722446\CORRESP\12199402.WPF\01/03/95)

3) Report on "Loose Ends"

Andy Ledford and Steve Howard discussed topics/statements that have been made among the team based on assumptions and can not be defended with data or calculations. It was noted that care needs to be taken when discussing these issues with the public so that the public is not misled. The following topics were discussed:

A) The team needs to be careful when saying that there is negligible risk at OU4. The calculated PRGs, based on our conservative exposure scenarios, indicates that there is an "actionable risk" at OU4. Under the No-Action alternative, the risk exceeds the 1.0x10-6 target risk level specified in the IAG. Arturo Duran stated that the new approved methodology to calculate PRGs is not as conservative as the methodology used in the OU4 IM/IRA-EA Decision Document. The regulatory agencies do not expect the OU4 PRGs to be re-calculated.

B) It has been said that the risks of shipping the contaminated materials to an off-site disposal facility may be as high or higher than the risks from leaving the materials in-place at the Rocky Flats Environmental Technology Site (RFETS). However, a risk assessment has not been performed to substantiate this statement. It was agreed that there were risks associated with offsite shipment, but that it was not necessary to perform a detailed risk assessment for transportation. This topic should only be discussed qualitatively in general terms.

C) The team needs to remember that it is not certain that Envirocare is a better place for the RFETS materials than OU4. For example, the closure plan for the envirocare facility is not nearly as detailed as the OU4 design, and it is not known whether the closure has a 1000 year performance requirement. Therefore, it is uncertain whether sending the OU4 materials to Envirocare is a superior option for waste management.

D) Use of an engineered cover was a presumptive remedy for the closure of OU4. An engineered cover was selected as the DOE baseline for the project for establishing a planning budget. The regulatory agencies were knowledgeable of the DOE baseline. A CERCLA evaluation of alternatives was performed to look at numerous alternatives. An engineered cover was ultimately selected for the project via the results of the alternative evaluation. The design of the engineered cover is very different than the DOE presumed engineered cover.

E) Retrievable Storage was not investigated as an alternative. The reason that retrievable storage was not investigated was that the DOE desired a final action for the OU4 SEPs. The material consolidated beneath the engineered cover is retrievable if necessary. The closure design is intended to be final, and the post-closure monitoring system will monitor the performance of the closure which is analogous to the upkeep of a retrievable storage facility.

F) The public is likely to question the inherent suitability of the OU4 site for the disposition of contaminated materials. The DOE had three options. The first option was offsite disposal. Envirocare is the only permitted disposal facility. This alternative was not selected due to the packaging, shipping, and disposal costs. The second alternative was to establish a hazardous waste landfill at an appropriate location at the RFETS. This alternative was not selected due to the anticipated 10 year period that would be required to locate a site, design the landfill, and receive a Certificate of Designation (CD-permit). The DOE therefore selected an onsite "dirty closure" alternative which is legal under the RCRA regulations and has been designed to be protective of human health and the environment. Harlen Ainscough commented that the CDPHE would not likely grant the DOE a Corrective Actions Management Unit (CAMU) in an uncontaminated area of the RFETS. Therefore, moving the closure would likely require a CD.

G) Members of the public may not trust the fact that computer models were used to demonstrate protectiveness of human health and the environment. Computer models had to be used to demonstrate that the closure was protective of human health and the environment because the period of performance is 1000 years. The Engineered cover was designed via engineering calculations. Computers were used as a design tool to perform some of the calculations.

H) Members of the public may question why the DOE is spending money to remediate OU4 which contains a small amount to plutonium contamination when many metric tons of plutonium is stored in old buildings. There are regulatory requirements and agreements that mandate the closure of the SEPs. The plutonium in the buildings is controlled and is not being released to the environment. The plutonium at OU4 is uncontrolled and has been released to the environment.

I) It is not possible to prove that the engineered cover will perform for 1000 years. The design of the engineered cover is based on DOEs most advanced research which utilizes natural materials with proven long term durability. The engineered cover has been designed via calculations for a performance period of 1000 years.

Andy Ledford stated that it is important that the working team members have the same facts so that answers provided to the public are consistent. Steve Howard stressed that the team answer public questions as sincerely and honestly as possible.

4) Requirements for Temporary Unit Approval

Kathy London discussed the approach that would be taken in the IM/IRA-EA Decision Document to request a Temporary Unit (TU) for the sludge and pondcrete treatment. Kathy

London indicated that the IM/IRA-EA Decision Document would be written to request a TU for process units on the 750 Pad and the 904 Pad. The TUs for these pads will each be operated separately for 12 months. DOE assumes that the approval of the TU will allow the commencement of sludge and pondcrete treatment. Harlen Ainscough indicated that secondary containment may not be required for a TU, and perhaps not all the Subpart J requirements will have to be met. Kathy indicated that the Proposed IM/IRA-EA Decision Document will not have a great deal of design details for the sludge and pondcrete treatment systems. Harlen Ainscough and Arturo Duran stated that the design details for the sludge and pondcrete treatment could be provided to the agencies through the title II design process in a manner similar to the engineered cover design. The agencies would like to be involved throughout the design process in a manner that will be similar to their involvement in the engineered cover design (review of the 60 and 90 percent packages). Arturo Duran requested that a status of the sludge and pondcrete treatment be added as an agenda item to a future team meeting.

5) Community Outreach

Eileen Jemison reported on the activities of the EG&G community relations department, and provided a current status sheet. The OU4 workshop is approaching on January 25, 1994. The workshop will consist of an initial video tape, followed by a 20 minute panel discussion, and then the audience will be broken into groups and allowed to visit specific stations were information will be available on the applicable regulations, the identification of the problem, the risks and alternatives, the engineered cover design, the post-closure care plan. Eileen Jemison requested that a member of the DOE, EPA, CDPHE sit on the panel for the opening discussions. In addition, a public stakeholder will also be invited to sit on the panel. This stakeholder may be a member of the CAB. A facilitator will begin the panel discussion by asking approximately three questions. The remainder of the panel discussion will be open for the public to ask questions. A dry run of the panel discussion will be held on January 10th at the Parsons ES 9th floor Conference Room. The dry run will begin at 1:00 pm and will last throughout the afternoon. Steve Howard and Kathy London will invite specific EG&G/DOE people to ask tough questions at the dry run.

The video will be formatted as a news talk show with a balanced identification of the issues, and interviews with at least the DOE, EPA, and CDPHE.

Philip A. Nixon