

discussion on the saltcrete reprocessing being considered part of Federal Facilities Compliance Agreement (FFCA II) agreement. EG&G feels none of those treatments are available yet, but holding the sludge until a disposal site is finalized does allow the option of using a new technology in the future. EG&G feels that holding the sludge until a disposal site is available allows the option of using future alternative technologies, if available and prudent.

- Corrective Action Management Units (CAMUs) were discussed. Rocky Flats staff are excited about applying the CAMU regulatory framework to the ponds. CDH indicated the state was unlikely to produce Colorado versions of CAMUs soon, due to lack of available staff. While the CDH representatives present do not expect to have primary responsibility for promulgating CAMU regulations, they think CDH is more interested in CAMUs for interim, rather than final, actions.
- Alternatives for handling the pond liners were discussed. EG&G feels the remediation investigation data may indicate the liners and soil immediately below the liners is clean enough to allow the liners to stay in place. CDH doubts this will be so. Everyone is anxious to see the data when it comes in. EPA noted that any interim measure DOE proposes must be consistent with possible final remedies, and adding new liners over existing liners that may need to be removed could be a bad idea. CDH noted that every closure of a surface impoundment in Colorado has included removal of the wastes.
- The best use of the IAG Table 6 IM/IRA was discussed. Though originally planned to provide RCRA closure for the ponds, it may be better to decrease the scope of the IM/IRA and accelerate the schedule. EG&G may be able to start on the IM/IRA in June, 1993. The RI data is needed to proceed to a decision on the best use of the IM/IA.
- CDH reviewed the steps and requirements for a hazardous waste landfill to be created. It may be very difficult to find a suitable site at Rocky Flats. The Colorado Geological Survey is a source for suitable siting information. The Solar Ponds' proximity to Walnut Creek may be sufficient to render the site unsuitable. The county government also must be involved. CDH is concerned that DOE could expend a lot of resources on the landfill option when it has a very poor chance of success. Remediation Investigation results directly below the ponds may be needed for a landfill closure option, and angle or horizontal drilling may be required for that, even if it is not required for the RFI/RI report. CDH recommended that DOE and EG&G work with the Colorado regulations and not just the 40 CFR regulations to ensure they understand the requirements.

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CDH heard that someone had told upper DOE, RFO management that a landfill option would be easy. They want this mistake corrected. The landfill option looks very difficult. DOE agreed to correct the possible false impression in their management.

- DOE would like to receive written endorsement from CDH on the approach to closure of the Solar Ponds. DOE will draft a letter for CDH's response. CDH made it clear they can not commit to any decision that requires data that has not yet been presented.
- The contents of DOE's request for an extension on the RFI/RI draft and final reports were discussed. CDH and EPA emphasized that all the reasons for the delay, not just the delay in pond sludge removal, must be included. They agreed to delay a planned meeting on the OU 4 activities for one week to allow EG&G and DOE to complete the extension request. EPA and CDH expect to have a meeting between the regulators to discuss options for the Table 6 IM/IRA.

The next meeting was tentatively set for Tuesday, April 20, 9:00 am. DOE expects to include pad storage issues and the Building 910 sampling plans in that meeting. DOE must confirm the topics with CDH and EPA since they may need to bring additional representatives to discuss these issues. DOE expects to invite a representative of the CDH air permit group to the discussion of the Building 910 sampling plan.

If you have any questions, or need additional information please contact J. B. Mellen on 966-8607.



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