

MEETING MINUTES

Subject: Follow-up Meeting for Phase I RFI/RI Work Plan - Inside Building Closures (OU15)

Date: April 20, 1992

Time: 13:00 - 16:00

Location: Colorado Department of Health, Denver, CO

Attendees:

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| Harlen Ainscough | Colorado Department of Health |
| Joe Schieffelin | Colorado Department of Health |
| John Reschel | Colorado Department of Health |
| Dave Maxwell | Environmental Protection Agency |
| Dennis Schubbe | EG&G |
| Jen Pepe | Department Of Energy |
| Greg Davis | S.M. Stoller Corporation |

The purpose of the follow-up meeting was to discuss and clarify issues related to the Phase I RFI/RI for Operable Unit 15 - Inside Building Closures at the Rocky Flats Plant.

The meeting began with the agencies providing their position on the issues and questions raised during the initial scoping meeting held on April 15, 1992. The issues discussed during the meeting are summarized below.

Inclusion of IHSSs in OU15

The status of the individual IHSSs were discussed and the following decisions reached by the IAG members regarding the IHSSs:

- 1) IHSS 215, Tank T-40, will not be included in the Phase I RFI/RI for OU15. Because this tank was historically connected to the original process waste lines, investigation of this tank is more logically performed as part of Operable Unit 9 (OU9) - The Original Process Waste Lines. Tank T-40 has already been included in the Phase I RFI/RI Work Plan for OU9 but is referred to as Tank T-13.
- 2) IHSS 212, Building 371 - Room 3420, is presently in operation as a drum storage area. Because this unit will remain operational and will be permitted under the Part B permit application for the Rocky Flats Plant, the unit will not be included in the OU15 investigation and closure.
- 3) IHSS 204, the Original Uranium Chip Roaster, will be included in the RFI/RI

for OU15. Although the Chip Roaster will be placed back in service for decommissioning and decontamination (D&D) activities, the unit will not be used to manage RCRA wastes. Therefore the Chip Roaster is not included in the Part B permit application and DOE intends to investigate and close the unit with respect to RCRA through the OU15 RFI/RI process.

- 4) IHSS 217, the Cyanide Bench Scale Treatment Unit, will be investigated as part of the OU15 RFI/RI.
- 5) IHSSs 178, 179, 180, and 211 will remain in OU15.

Scope of the OU15 RFI/RI

Issues related to the scope of the OU15 RFI/RI included were discussed and are summarized as follows:

- 1) IHSS boundaries will be defined on an individual basis. As appropriate, the boundary for a drum storage area may be defined as an entire room or an area within a room where drums were stored.

The boundary of IHSS 217, the Cyanide Bench Scale Treatment Unit, is considered to be the 4 1-liter bottles containing cyanide/cyanate wastes (if still present at the unit), the lab table where the bottles were kept, and the fume hood. Inclusion of the drain pipe that transported cyanate waste from this unit to Building 374 for further treatment will be based on an evaluation of building construction information. As appropriate, the drain pipe may be included in IHSS 217 and investigated as part of OU15, included in the OU9 RFI/RI, or further investigated during D&D.

The boundary for IHSS 204, the Original Uranium Chip Roaster, will include Rooms 31 and 501 where drums of wastes were transferred into and out of the Chip Roaster.

- 2) In accordance with the IAG, the OU15 RFI/RI will characterize "the nature and extent of contamination at, or resulting from each unit...". Characterization will include investigation of the IHSS itself and any releases from the IHSS. A release is considered to be contamination (related to the IHSS) located outside of the IHSS boundary and may include, as appropriate, other portions of the building and environmental media outside of the building. Investigatory activities will be presented in the Field Sampling Plan (FSP) included in the work plan.
- 3) In accordance with the IAG, further action at an individual IHSS may be required by the agencies if there has been a release from the unit. Further action has been interpreted to include further investigation performed during D&D activities. For example, further investigation of contamination

underneath a building related to OU15 IHSSs may be more easily and cost-effectively performed during D&D activities.

However, at this time, no agreement has been reached with DOE regarding the involvement of the agencies in D&D activities. Prior to final approval of a work plan which recommended deferring investigatory activities until D&D, CDH and EPA would require from DOE a written commitment to include the agencies in the D&D process.

Scope of the Baseline Risk Assessment

The scope of the Baseline Risk Assessment including the Environmental Evaluation and Human Health Risk Assessment were discussed. The following decisions were reached:

- 1) As discussed during the April 15, 1992 scoping meeting, an Environmental Evaluation will not be performed for OU15.
- 2) For IHSS which are not clean closed, a Human Health Risk Assessment will be performed to establish the risk to humans associated with any residual contamination at the individual IHSSs. This Human Health Risk Assessment will include the risk of exposure of workers at the Rocky Flats Plant to wastes associated with OU15 IHSSs.

Closure Plans

The relationship between the existing closure plans and the RFI/RI was discussed in addition to the status of the agency's review and approval of the closure plans. The discussion is summarized below:

- 1) Closure Plans for the OU15 IHSS, required by the IAG, are presently in the review and approval process. Although closure plans are not required for the 90-day accumulation areas, closure plans are required for IHSSs 178, 179, 180, and 211 because RCRA wastes may have been historically stored at these locations for longer than 90 days.
- 2) Review of the existing closure plans and preparation of the OU15 RFI/RI work plan will proceed concurrently. The characterization (i.e. sampling and analysis) activities presented in the FSP portion of the RFI/RI work plan will be included by reference into the existing closure plans as appropriate.
- 3) By November 8, 1992, drums stored in the drum storage areas must be moved to a RCRA-permitted storage unit. However, closure plans do not need to be approved before moving the drums.