

Meeting Minutes

Subjects: Facility Disposition RFCA Standard Operating Protocol, 771 Stack Strategy, Component Removal, Size Reduction, and Decontamination RSOP

Date: June 7, 2000

Location: CDPHE

Attendees: Edd Kray, Dave Krucke, Steve Tarlton, James Hindman, Steve Gunderson, Fred Gerdeman, Jeff Stevens, Dyan Foss, Catherine Madore, and Gerry Kelly

Objective of the Meeting: To discuss the CDPHE comments on the subject documents

Meeting was chaired by: Steve Tarlton

File: Administrative Record

The meeting was an informal roundtable in which everyone asked questions and expressed concerns. The discussions were initiated by discussing the need to continue the D&D meetings. It was agreed that everyone was interested in a meeting on the baseline, and that the need for further meetings would be addressed after the baseline meeting. It was generally agreed that the previous format of the meetings was not helpful and that future meetings should be tailored to everyone's interests. Tarlton requested that the Projects start to identify milestones for the RFCA milestone identification process, which will be taking place shortly.

The following is a summary of the questions/concerns asked/expressed during the meeting:

Facility Disposition RSOP - The discussion on this RSOP was focused on the preliminary responses prepared to their comments. Copies of the completed matrix and some redlined text of the ER transition were handed out.

- Tarlton indicated that the responses were fine with the exception of 3 and 19. He said he will evaluate the response to question 3, but he is unsure that since the FDPM is not a regulatory document, it is sufficient to address his comment there.
- Lengthy discussions were held on the inclusion of explosives in the RSOP. It was generally agreed amongst the regulators that explosives will not routinely be used; therefore, should not be included in the RSOP. Tarlton indicated that in today's environment of communication, he believed we could include the use of explosives in an RSOP. However, he wants it removed because it is possible that in several years, when we are ready to implement the RSOP and use explosives, the relationships and communication may have degenerated. Some requests and suggestions were made about this section to include:
 - Providing the regulators with a list of the buildings and areas that explosives may/could be used. - Tarlton



ADMIN RECORD

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1/3

- Adding the requirement to characterize the under building and surrounding area to ensure that contaminated soils are not disturbed by the use of explosives. – Kray
 - Limiting the use of explosive to areas within the building and excluding the use of explosives on the entire building and stack. – Tarlton
 - Removing explosives from this RSOP and preparing a separate RSOP for the use of explosives in a couple of years when we have more information. – Gunderson
 - Rewording the requirement for a public briefing to indicate it will be more consultative in nature than notification oriented. – Kray
- ❖ Tarlton brought up the issue that the National Renewable Energy Laboratory is interested in utilizing several buildings on site and taking over the industrial area. A lengthy discussion was held on this topic and DOE's awareness of it.

771 Stack – This stack strategy was provided with the comment resolution table as an example of the use of explosives. It was a draft document for information only. Generally, Tarlton thought it was a good start for planning, but indicated that he would like to see the rest of the strategies that go with it. He suggested that the stack and tunnel strategy be separated because they are such different subjects and that most of his concerns with the strategy were related to the tunnel. He indicated he is very uncomfortable about leaving the tunnel in place and filling it with flowable fill as a dispositioning method.

Component Removal RSOP – This document was provided to the regulators 14 days prior for their formal review. It was the objective of this review that most of the issues could be worked out, so when the document goes to public comment, it would be essentially complete. The comments have been organized by the reviewer, and it should be noted that all of the regulators indicated that their reviews were preliminary and they had not had much time to devote to the document. In addition, there were several instances where the regulators did not seem to agree.

- **Tarlton** – He indicated that he thought the document was well written, organized and laid out, but that this was the first RSOP developed that tries to cover so much scope. He was concerned about how we are going to tie the scope of the RSOP to the buildings. How are the regulators going to know when a building has an area that is not covered by the RSOP.
- He suggested we have a better description of the notification letter, and we have 2 options: 1) the notification letter can indicate what sections will be implemented and go into details like what section will be applied to each set OR 2) the notification letter can contain any exceptions to the RSOP and an indication if the project has areas that are not covered by the RSOP and what decision documentation will be prepared to cover that scope.
- He suggested we add a requirement that when the exterior shell of a building is breached that all of the area/room behind it will already be decontaminated to minimize the potential of release. He would like this activity to be the last thing conducted before demolition.
- Suggested we incorporate the zone terminology into the ventilation figure. The text and figure should clearly and consistently present the removal decision and sequence.
- Page 20, item g – he would like a statement added that the pipes will be mapped when disconnections are made.

- **Kray** – He indicated that he was still not comfortable with the document, its scope, or controls. He also indicated that he does not think that the removal of external walls (any breaching of the shell) is routine and should be included in the RSOP.
- He suggested that the ALARA requirements be added to the NESHAP requirement for air controls.
- He committed to provide an example of what he thinks is necessary to make the ES&H tables sufficient.
- He thought the ventilation section answered their previous questions and was well written and organized.
- **Hindman** – He felt that the requirements for the closure of RCRA regulated units were not equivalent to a CDD. After some discussion, he agreed he should review the document more thoroughly.
 - He suggested we add a consideration for airborne mist in figure 3, such mist should contain acids and organics.
 - He suggested that in Section 3.1, item i, he would like the equipment referenced to be more specific.
 - He had questions on the section of process versus remediation waste.
- **Gunderson** – He supports the RSOP concept, but we need to clearly define what the RSOP does and does not cover before he can sign off on it. He also indicated that we should be aware that the NRC rules are potential ARARs and that the issue is currently being discussed.
- **Kruchek** – He had no general comments.
 - He had a question on figure 3. He thought the drains would already be plugged at this point. Perhaps a statement should be added to indicate they are probably plugged, but it should be verified.
 - Table 1, Page 31, he thought that the disconnection of equipment should be expanded to include ventilation systems and tank vents, and that the table should reference Section 3.5.
 - Section 3.5 and 3.6 discusses zones, but it does not address the contamination in the building, and he found the section confusing.
 - He has some concerns with the structural integrity of a structure once structural members and interior/exterior walls were removed.
 - He also had concerns about the wind requirement during the removal of exterior portion of the facility. He felt the language should be strengthened to indicate that wind would be accounted for during the entire removal process, not just the beginning.
 - Section 6.1 indicates that soil samples have been taken. He would like the section to contain more information about what kind of samples were taken and where.
 - He had some questions about the status of foundation drains and pumps throughout the process. He would like a statement added that says that pumps and drains need to be active to prevent groundwater from coming into the structure. Text should also discuss when such equipment will be disconnected. Perhaps we could add the table from the Facility Disposition RSOP.