

WorldwideSecurityServices, Ltd.

October 5, 2001

01-RF-02387

D. C. Shelton, Environmental Systems and Stewardship, Kaiser-Hill, Building
115, X9877

CLASSIFICATION REVIEW EXEMPTION REQUEST (JAN-105-01) WSS-C0-
01-0784

Ref: Consolidation of Classification Exemptions for Environmental
Information, Memorandum from Dave Shelton to Janet Nesheim,
DCS-011-01, October 2, 2001

I have granted your referenced request for an exemption from the requirement for classification and Unclassified Controlled Nuclear Information (UCNI) review for environmental information routinely generated by your department to the Department of Energy, the public, the State and Federal regulators as part of the commitments under the contract, the Rocky Flats Closure and Agreement (RFRA), the reporting requirements of our State and Federal permits, and the general commitment of open communication of environmental matters. General information form and content are detailed on page one of your referenced memorandum.

The exemption covers the following areas of information, with content explanations given on pages two and three of your referenced memorandum (attached):

- Air monitoring
- Meteorology
- Surface water
- Groundwater
- Soil
- Geologic
- Ecological
- Field sample
- Environmental documents

ADMIN RECORD


www.worldwide-security.com

ph 630.794.0900

fax 630.794.0933

201 E. Ogden Avenue

Suite 208

Hinsdale, IL 60521

SW-A-005475

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- Environmental data presented on "reviewed" base maps from Site Geographic Information System (GIS)
- Close-up field resource photos
- Actinide Migration Evaluation (AME)

I have determined that these areas of information will not contain classified information or UCNI and therefore need not be reviewed for classification or UCNI for on-Site, off-Site, or public use. This exemption is in effect until Site closure. However, if any significant changes in the nature of these documents should occur, a revised exemption request must be submitted.

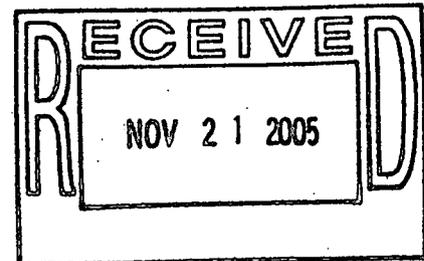
This review exemption does not apply to formal releases to the technical/professional literature such as journal articles or conference papers; such documents and formal releases must still be submitted to the Classification Office for review. The exemption also does not apply to reviews for other possible restrictions on release that are outside the purview of the Rocky Flats Environmental Technology Site (RFETS) Contractor Classification Office including, but not limited to, information that may be subject to control as company sensitive or information covered by intellectual property or privacy regulations. Kaiser-Hill legal counsel should be consulted about possible release restrictions for information that is not classified or UCNI.

Please cite exemption number **CEX-105-01** when justification for a lack of review is needed. This exemption is not department- or company-specific; it includes distribution of these documents to RFETS and Department of Energy Rocky Flats Field Office personnel. You may call me on extension 4595 or B. M. Hoffman on extension 4601 if you have questions.



J. A. Nesheim
Classification Officer

Attachment (1):
As Stated



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cc.

R. B. Hoffman	- DOE RFFO
P. S. Arnold	- K-H
J. H. Berardini	- K-H
J. L. Butler	- K-H
B. M. Clausen	- K-H
S. L. Cunningham	- K-H
C. A. Deck	- K-H
K. A. Dorr	- K-H
C. Freiboth	- K-H
T. Hopkins	- K-H
S. M. Nesta	- K-H
R. C. Nininger	- K-H
K. North	- K-H
J. L. Stevens	- K-H
M. W. Simpson	- SSOC



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COMPANY

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MEMORANDUM

DATE: October 2, 2001

TO: Janet Nesheim, Classification Office, Bldg. 441, X4595

FROM: ^{DCS} Dave Shelton, Environmental Systems & Stewardship, Bldg. 115, X9877

SUBJECT: CONSOLIDATION OF CLASSIFICATION EXEMPTIONS FOR ENVIRONMENTAL INFORMATION – DCS-011-01

Kaiser-Hill Company, LLC (Kaiser-Hill) is required to routinely provide environmental information to the Department of Energy, the Public, and State and Federal regulators as part of the commitments under the contract, the Rocky Flats Closure and Agreement (RFCA), the reporting requirements of our State and Federal permits, and the general commitment of open communication on environmental matters. General information form and content commonly shared includes:

- Public presentations, but not including journal articles and conference papers intended for formal release to the technical/professional community
- Internet distribution of data and reports
- Distribution of data from environmental data systems
- Various routine and special reports and documents, which are required by state and federal regulations and agreements
- Monthly reports on monitoring data supplied to the Department of Energy, Rocky Flats Field Office
- Kaiser-Hill correspondence transmitting environmental information or regarding environmental issues
- Various routine and special reports and "white papers" which are prepared for acceptance by offsite facilities for treatment or disposal of "unclassified" waste, such as the regulatory analyses of gloveboxes as nonhazardous waste

Environmental information and publications have been almost exclusively unclassified and non-Unclassified Controlled Nuclear Information (UCNI) in content. This letter requests all information listed be exempted from Information Security or authorized classifier review.

Currently there are three waivers pertaining to security review of environmental information generated at the Site:

Exemption #	Date Approved	Expiration Date	Issued To:
CEX-072-00	August 26, 1999	Permanent	Dave Shelton
CEX-010-98	February 25, 1998	February 1, 2003	John Law
CEX-266-95	November 28, 1995	No Date	Kent Dorr

I propose consolidating these previously approved waivers into one exemption to cover all the information listed above including:

- **Air monitoring information:** ambient and effluent air analytical and physical flow measurement data, database structures and definitions reports and environmental documents
- **Meteorology information:** meteorology data (wind speed, temperature, dew point, etc.), database structures and definitions, reports and environmental documents
- **Surface water information:** surface water analytical, flow rate and physical parameters (i.e., temperature, pH, etc)
- **Groundwater information:** groundwater analytical and physical parameter (i.e., water levels, pump tests, pH, temperature, etc.) database structures and definitions, reports and environmental documents
- **Soil information:** soil analytical and physical parameters, reports and environmental documents
- **Geologic information:** geologic borehole logs and interpretations, well construction diagrams, and other information and data related to the geologic formations and investigations at the Site, including database structures and definitions
- **Ecological information:** Site ecological information including information on flora and fauna species, wetlands, species distribution and species protection areas
- **Field sample information:** field sample collection measurements (i.e., pH, depth, temperature and other physical parameters) associated with collection of field environmental samples
- **Environmental documents:** environmental documents and letters including routine regulatory reports, notices, standard operating procedures, monitoring reports, environmental data collection and analysis procedures (CEX-010-98, CLW-038-94, CEX-266-95 and R. B. Hoffman letter dated June 11, 1991):
 - Data validation and verification instructions
 - CERCLA reports and documents including work plans, technical Memoranda, Remedial Investigation/Feasibility Study reports and risk assessments
 - Proposed Plan, Corrective Action/Record Decision/Record of Decision
 - Decision documents such as proposed action memorandum, RSOPs, Interim Measure/Interim Remedial Action and draft modification of Colorado Hazardous Waste Corrective Action Reports

- Laboratory analysis instructions
 - Pond operations
 - Source evaluation plans
 - Treatability study data and workplans
 - Historical Release Report
 - Design/Engineering documents for WM/ER projects
 - Treatment Strategy Reports
 - Waste Characterization "white papers" supporting information and analytical data such as the regulatory analyses of gloveboxes as nonhazardous waste
 - Data summary reports and closeout reports
 - Project status briefs
 - Public Information/Involvement Plan
 - Administrative Record Files
 - Project Specific Update Reports
 - Performance Measure Status Reports
 - Waste handling and shipment and sampling plans
 - Quality Assurance Plans
 - RCRA documentation such as closeout reports. RFCA documents and reports such as the IGD and quarterly reports
 - Environmental regulatory issues
- **Environmental data presented on "reviewed" base maps from Site Geographic Information System (GIS):** the Site GIS provides various maps for environmental reports. Most maps consist of standard coverages (e.g., roads, buildings, waterways, utilities, topography, etc.) These base maps are routinely reviewed for classification prior to release. The GIS staff overlay environmental data on the base maps for data presentation purposes.
 - **Close-up field resource photos:** close-up photographs of animal and plant species that do not contain any views of any Site facilities, roads, utilities or other structures. Photos of fieldwork that do not reveal any areas within the limited Protected Area.
 - **Actinide Migration Evaluation (AME):** the AME group, comprised of on-site personnel and national experts on actinide migration in the environment, provide numerous reports and summaries to Stakeholders and Regulators including:
 - Actinide loading into surface water evaluations
 - Reports discussing pathways for actinide migration in the environment
 - Results of erosion and air modeling
 - Results of specialized experiments on environmental samples
 - White papers on actinide migration-related topics
 - Meeting summaries from AME members

If you have any questions regarding this request, please contact me at extension 9877.

DCS:lt

cc:

Pam Arnold	Brett Clausen	Cameron Freiboth	Bob Nininger	Jeff Stevens
Jackie Berardini	Carol Deck	Ted Hopkins	Karen North	
Lane Butler	Kent Dorr	Steve Nesta	Mark Simpson	

"Safe Stewardship of Land, Air, Water and People"

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