

ROCKY FLATS CITIZENS ADVISORY BOARD

MINUTES OF WORK SESSION

June 5, 1997

FACILITATOR: Reed Hodgins, AlphaTRAC

Tom Marshall called the meeting to order at 6:10 p.m.

BOARD / EX-OFFICIO MEMBERS PRESENT: Alan Aluisi, Susan Barron, Jan Burda, Eugene DeMayo, Tom Gallegos, Paul Grogger, Mary Harlow, Susan Johnson, Sasa Jovic, Bob Kanick, Jim Kinsinger, Beverly Lyne, Tom Marshall, Linda Murakami-Sikkema, David Navarro, Gary Thompson / Jeremy Karpatkin, Frazer Lockhart, Gary Kleeman, Steve Tarlton

BOARD / EX-OFFICIO MEMBERS ABSENT: Tom Clark, Tom Davidson, Victor Holm, Todd Saliman

PUBLIC / OBSERVERS PRESENT: Kenneth Werth (citizen); John Metz (citizen); Jim Stone (RFCC); Russell McCallister (DOE); Mari Margil (RFLII); Jerry Anderson (RMRS); Michael Maline (citizen); Ken Korkia (CAB staff); Chris Millsaps (CAB staff); Erin Rogers (CAB staff); Deb Thompson (CAB staff)

PUBLIC COMMENT PERIOD: No comments were received.

ENVIRONMENTAL/WASTE MANAGEMENT COMMITTEE - UPCOMING ISSUES (Tom Gallegos): The committee will be discussing the following two issues at its upcoming meeting on June 19. The committee gave a brief presentation on its work, followed by presentations from the site. CAB members were asked to comment on issues they would like to see addressed. These comments will help the committee form the basis for its discussion at its June meeting.

- ***Corrective Action Management Unit (CAMU) application review and comment.***
This CAMU proposes establishing and regulating under RCRA guidelines two temporary onsite waste storage facilities. The facilities are planned as a contingency in the event offsite disposal is delayed (i.e., Envirocare), and would allow cleanup of the site to continue uninterrupted. The site is proposing two CAMUs: 1) a containerized storage facility for waste ready for shipment; and 2) a

bulk storage facility for the storage of material such as building rubble and soils. The comment period ends on July 28.

General Q&A / Comment Session:

Question: Tom Marshall: In RFCA, there is language that says any CAMU must be designed so it is suitable either for storage or for disposal. If that is the case, how does that apply to these two you are proposing?

Answer: Bill Prymak: The current proposals are only for storage. The Butler buildings wouldn't work for disposal. The bulk cells would have a leachate collection system designed to meet a disposal type facility if that was decided at a future time, but the plan is only for storage. Both documents also have sunset provisions, tied to the intermediate site condition in RFCA. The CAMU would have to be closed by the end of that period, which is 25 years. The CAMU designation would expire in 25 years.

Question: Tom Marshall: You could decide that the bulk site could be disposal?

Answer: Bill Prymak: Yes, but that would be then subject to a completely separate application and would have to meet the requirements in place at that time, if that diversion is made.

Comment: Mary Harlow: I'm a little disturbed about the bulk storage being added to the CAMU. Originally we were just talking about Butler buildings, and now we're having bulk storage added on over the solar pond area, which is the most contaminated spot on the site. I can't imagine you can build anything over those solar ponds without first remediating them.

Response: Bill Prymak: That's correct, we would have to remediate and clean up that area to a suitable level.

Question: Mary Harlow: Is the saltcrete and pondcrete going on there also?

Answer: Bill Prymak: No, current plans are to ship that waste to Envirocare.

Question: Mary Harlow: I understand there's been a problem with some of the saltcrete that's been sent to Envirocare already, that one of the containers had water in it?

Answer: Bill Prymak: That's true. The source of the water wasn't known, but it has been sampled and is now clean, and the site has taken corrective actions to prevent

that happening again.

Comment: Mary Harlow: This CAMU looks familiar with what we went through a few years ago on OU4. I'm a little disturbed about this way of going through the back door to get onsite storage of bulk material.

Comment: Kenneth Werth: Your best estimate of getting that waste offsite is five to 25 years. Aren't you assuming a lot about getting all that waste offsite? You're not going to spend all this money for an interim period. Each site in the U.S. is going to have to have a storage and disposition facility for hundreds of thousands of years.

Question: Susan Johnson: Is there any requirement in RFCA or anywhere else that you revisit these plans at some point in the future?

Answer: Bill Prymak: There's no requirement that I know. If the facilities are built, the designs and operations will need to go through further public comment period before that could happen. These are just to designate the areas to allow this type of activity.

Question: Susan Johnson: So after the designation, you won't expend any more effort or resources on this issue until something is required?

Answer: Bill Prymak: Yes, that's my understanding.

Question: Susan Barron: What is your basis for determining where you are putting those?

Answer: Bill Prymak: We did some site studies to look for the best areas. CAMU regulations don't require but recommend placing the facilities in previously contaminated areas, that was the reasoning for the selection of the area to site the bulk storage CAMU. The other site is in a currently uncontaminated area, but it's within the industrial area of the plant that's already disturbed, and is the type of facility that we don't expect to cause any type of damage to the environment.

Question: Tom Gallegos: It was my understanding that the bulk storage area was going to be directly east of the solar ponds area, not that you were going to place it on top of the existing solar ponds. Don't you think there's a conflict? There is a lot going on in the solar ponds area having to do with contaminated groundwater.

Answer: Bill Prymak: I don't believe that designating the facility there limits or prevents the site from doing remediation work. The area still needs to be cleaned

up before the facility could be constructed there. There is nothing in the CAMU designation that would change that, or allow the site to bulldoze over the solar ponds as they are and construct a facility. Jennifer Uhland: There is a RFCA milestone that requires RFETS to remediate the groundwater. It's a separate action.

Some of the questions, concerns and comments expressed by Board members included:

- What regulatory steps will have to be taken before the CAMUs can be designated as disposal sites?
- In Part 8, paragraph 80 of the Rocky Flats Cleanup Agreement (RFCA), it was agreed that the design criteria for the CAMU designation would be the same whether it is for retrievable, monitored storage or for the disposal of remediation waste. With this in mind, how can a design life of 25 years meet design criteria for disposal, if that becomes a reality?
- What factors will determine when off-site disposal options are not viable and that construction of the CAMUs for temporary storage is necessary?
- What steps will be taken to remediate the Solar Pond area before the construction of the bulk CAMU?
- What is the cost of construction of the CAMUs and how will it be financed?
- What were the deciding factors in using the "Butler" Buildings and how do they meet the 25-year design criteria?
- What is the regulatory process which must be followed before the facilities are actually built?
- What types of waste will be stored in the CAMU, low-level radioactive and mixed only, or will it also be TRU waste?
- Within the facilities, what specific types of monitoring will be used and how accessible will this monitoring be?
- Are there any expected difficulties in retrieving the waste from the facilities, especially for the bulk facility, for off-site disposal at a later date?
- Will stored containers of waste meet disposal criteria?

-- How will security of the facilities be addressed?

-- How will public involvement be incorporated into the pivotal points of the construction of these facilities?

-- What were the steps taken in siting the designations? Please provide a copy of any siting studies which were performed.

-- For the bulk storage facility, please describe the cover mechanism that will be used.

-- What plans have been made to cover emergency events (i.e., natural disasters or terrorist attacks)?

- ***Proposed Action Memorandum (PAM) for the remediation of the T1 Trench review and comment.*** The PAM initiates the remediation process for the T1 Trench area, and provides background on the Trench and a cursory review of the proposed steps for remediation. Project specifics will be released in later documents. T1 Trench is located near the Mound area west of the east access gate to RFETS, and contains as many as 125 drums with potentially pyrophoric depleted uranium chips and turnings. The project's objective is to remove depleted uranium waste by controlled excavation - removing one drum at a time; stabilizing and encapsulating for offsite disposal; and removing and treating any debris or contaminated soil. Through the end of this fiscal year, project managers will continue research and develop strategies for completing the project. Implementation of the project is expected to begin November 1997, with excavation slated to begin in January or February 1998. The comment period for this PAM ends June 21.

General Q&A / Comment Session:

Question: Eugene DeMayo: Should one of the drums catch fire, what problems might be associated with that?

Answer: John Rampe: My understanding is a depleted uranium fire is a smoldering fire, more heat and low dispersion. Should that happen, we will have the fire department there on call ready to deal with the situation. We are also going to enclose the treatment facility and to minimize the eventuality. That is the reason for the project approach, so the time of exposure and the amount of material exposed in the air at any one time is minimal.

Question: Mary Harlow: The Site Technology Coordination Group received a list

of technology needs for the site, for each area. One of the needs was for the T1 Trench excavation, and the fact that there was great concern for the workers. It showed a real need for advanced technology to protect the workers. Have you addressed this, or are you going to just use the baseline technologies that are available?

Answer: John Rampe: We are going to use the baseline technologies. We do have a group of experts who are going through the project step-by-step and trying to evaluate the individual hazards, and coming up with procedures. That team has not identified anything on this job that can't be adequately dealt with by use of existing technologies.

Question: Gary Thompson: The drums have been there at least 35 years. Do you expect to find drums for the most part intact or rusted, or in other conditions?

Answer: John Rampe: Mostly intact, but probably there will be some variations.

Mark Burmeister: As far as the condition of the drums, we do anticipate a wide range. Based on the T3/T4 and other excavations, we did find drums in various conditions. For the T1 project, we anticipate that based on the way these drums were packaged with a water-based coolant, there's a good chance that there will not be a lot of drums intact. There is a good chance that the material will be fairly well oxidized.

Question: Kenneth Werth: I keep reading about your microwave process. Are you saying that this microwave technology you're using is destroying the uranium, plutonium, americium, cadmium and all of those materials that are caught up in the soil? What are you doing with them?

Answer: John Rampe: We didn't consider microwave technology for this waste, for the depleted uranium. We made a decision to go as simple as we could on this material, and to treat the material, to keep it from becoming pyrophoric and to treat the material as close to the excavation as possible. Those are the two reasons we chose this option.

Question: Susan Barron: I have a lot of questions about characterization. Plutonium was identified and analyzed in one of the boreholes outside of the trench, but it's not one of your chemicals of concern. Also, you don't expect VOC contamination?

Answer: John Rampe: We do not have direct characterization of what is in the Trench. We have avoided putting holes in the ground. We are relying on historic references to the Trench. VOCs are a contingency.

Question: Jim Kinsinger: Your Tier 1 levels seem high to me, especially for cyanide, where it's noted that as long as it's less than 15% cyanide, you're not going to worry about it.

Answer: John Rampe: Offhand, 15% does seem high. But I'm not sure, I will have to look at that.

Question: Tom Marshall: Is there contamination leaving the Trench? If so, how much, and how fast is it moving?

Answer: John Rampe: Not that we're aware of. We don't see any evidence of volatile organic contaminants downgradient. Uranium is a fairly immobile contaminant.

Question: Susan Johnson: Under action level framework, why do you cite a proposed EPA regulation rather than the Soil Action Levels determined under RFCA? How does this level for uranium relate to the Soil Action Levels that were set?

Answer: John Rampe: Without that in front of me, I'm not sure. But the bottom line is the RFCA Soil Action Levels are guiding the project. Steve Tarlton: They are using the Soil Action Levels. We have a commitment to review the SALs annually. I don't know why they cite the EPA regulation rather than the SALs.

Comment: Tom Gallegos: We asked a long time ago for a summary of these issues, so that CAB could be involved and be partners on this project. The information received has been insufficient and unsatisfactory.

Response: John Rampe: As I've gotten information, I made sure to get it to CAB as soon as possible. What we have committed to do is to get documents to you and discuss those with you. We're trying to establish a dialogue on this project as the documents come out. I apologize, and I would like to keep that dialogue going. Unfortunately, a lot of these documents are not out yet, but we will share them with you when they are. Frazer Lockhart: There is a commitment by the department to respond to the critical reporting elements. That is here this evening, but we would have liked to have gotten it here sooner. That's somewhat our failing, and we will look in the future to use those critical reporting elements and have them for CAB's use sooner than the night of the meeting. The fact that we are here demonstrates that we are committed to do that for the future. Also, some of the documentation you don't have because it doesn't exist. That's part of the trade-off of getting early involvement in the process. John made a commitment to share this with the committee, and DOE stands behind that.

Question: Mary Harlow: I would like to know if it's possible for us to get a copy of the project management documents? I think it's important for the public to know how well managed this project is going to be.

Answer: John Rampe: The documents we have talked about getting to the committee are things like the auditable safety analysis, which contains the nuclear safety analysis; our activity control team will put together their report discussing the hazards to be anticipated and what procedures will exist to take care of those hazards. Those documents will be made available. There is a field implementation plan, and a health and safety plan coming out. Those documents may be interim in nature, but will be finalized right before the job starts. But we will get drafts of those to you. We have committed to get those things to the committee.

Some of the questions, concerns and comments expressed by Board members included:

- What is the probability of a fire from depleted uranium?
- What will happen to the remediation if the Soil Action Levels become more stringent in the future?
- Can the public comment period on the PAM document be extended to 45 days?
- What is the public's involvement in the remediation project?
- What is the monitoring program for this project, including both permanent and project-specific monitors?
- Are there special fire protection and response equipment that will be needed for fire suppression?
- Is there a special emergency response plan for this project?
- What kind of sampling and analysis protocol will be used during the remediation of the trench?
- How will the waste be characterized?
- Please provide a copy of the ACE Team reports on the T1 project.

-- What steps have been taken to integrate the lessons learned from the remediation of the T3 and T4 Trenches?

Comments collected at the Board meeting will be forwarded to DOE with a request for a written response by June 13. The committee will draft a recommendation based on CAB comments, questions, and DOE responses, for the Board's approval at its July meeting. Board members were also encouraged to participate in the committee meeting to help draft recommendations.

RECOMMENDATION TO EXTEND PUBLIC COMMENT PERIOD (Tom Gallegos): The Environmental/ Waste Management Committee recommended that CAB ask DOE to extend the current 30-day comment period to a 45-day comment period, ending July 7.

***Decision:** Approve recommendation asking for extension of deadline for public comments on the T1 Trench PAM. APPROVED BY CONSENSUS.*

PARKER-HALL CONTRACT EXTENSION (Ken Korkia): Parker-Hall, Inc. (PHI) was contracted by CAB to do an evaluation of the monitoring systems at Rocky Flats. The project originally was scheduled to be completed the end of May, with a presentation at CAB's June meeting. PHI has encountered some difficulties in gathering information, and asked for an extension. The contract has been extended to June 30, when the draft reports will be completed. CAB, DOE/Kaiser-Hill and the regulators have an opportunity to review these documents in the next few weeks and give comment. The reports will be printed by July 23, and distributed to CAB with the Board packet for August. PHI will present its findings and recommendations at the August 7 Board meeting.

COMMUNITY NEEDS ASSESSMENT HANDBOOK DEVELOPMENT (Beverly Lyne): In response to CAB's recommendation no. 97-1, discussing the Rocky Flats Community Needs Assessment, DOE-HQ responded that it would be willing to earmark up to \$50,000 to fund the development of a methodological handbook on how to perform a community needs assessment, which could be used by other sites to aid in gathering public input. The Health Committee drafted a letter to be sent to Al Alm asking that DOE-HQ work with the University of Colorado School of Nursing to disburse the funds necessary to complete the handbook. Also, the letter asks DOE to continue discussing with CAB how to implement other themes and findings from the Community Needs Assessment.

***Decision:** Approve the letter to Al Alm. APPROVED BY CONSENSUS.*

PUBLIC COMMENT PERIOD: No comments were received.

NOTE: Board members congratulated fellow member Beverly Lyne, who recently received the Florence Nightingale Award. Beverly is a community health nurse in Boulder.

WIPP TRANSPORTATION ISSUES RECOMMENDATION (Eugene DeMayo): The National Issues Committee brought forth a second draft of the recommendation they have prepared discussing specific issues related to transportation of waste to the WIPP facility in southern New Mexico. In response to this draft recommendation, Jeremy Karpatkin (DOE-RFFO) addressed a letter to the Board asking that CAB consider hearing from DOE officials from the Carlsbad office and give DOE an opportunity to present its side of the issues addressed in the draft recommendation. Jeremy's letter included an attachment which commented on specific aspects of the draft recommendation.

***Decision:** Send the recommendation back to the National Issues Committee, and ask the committee to consider DOE's comments and to hear from DOE officials. APPROVED BY CONSENSUS.*

BOARD BUSINESS:

- Retreat Planning. CAB will hold a half-day retreat this Sunday, June 8, at the Doubletree Hotel. A packet of information on subjects to be discussed at the retreat was mailed out to Board members in their monthly Board packet. CAB members were asked to review those materials prior to the retreat on Sunday.
- CAB 1998 work plan and budget development process. Ken Korkia presented information on staff's proposed process for developing the 1998 CAB work plan and budget. Input will be solicited from DOE, the regulators, and the public. CAB committees will develop draft committee work plans and identify any contract research opportunities; the co-chairs will oversee the development process. A survey will be sent to Board members, DOE and regulators and the public asking for comments and evaluation on CAB's work. The results of the survey will be used to help define activities for CAB's work plan. At the September Board retreat, CAB will finalize the draft work plan and budget, so that it will be ready for approval at the October Board meeting.

***Decision:** Approve work plan/budget development process. APPROVED BY CONSENSUS.*

- CAB responses to DOE concerning the MPN letter and request for unfulfilled information needs. Board members spent time continuing their discussion about a letter sent from the Military Production Network to DOE-HQ, which made reference to the Board and problems with information requested from DOE. Tom

Marshall, on behalf of the Rocky Mountain Peace and Justice Center, sent a letter of clarification to Secretary Peña stating that MPN's letter did not express the views of CAB. Some Board members were still concerned about representational issues, but felt that the response letter adequately addressed their concerns. Also, a letter was drafted to Jeremy Karpatkin discussing his request for details on what information needs had not been fulfilled by DOE. Board members could not agree on how to address his letter, and what should be in the response.

Decision: *Table the draft response letter to Jeremy Karpatkin. APPROVED BY CONSENSUS, WITH ONE ABSTENTION.*

- Recommendation from Executive Committee to form *ad-hoc* D&D Committee. So that CAB will be able to review and comment on several important D&D activities currently planned over the summer, the Executive Committee recommended that the Board approved establishing an *ad hoc* D&D Committee. The Board will consider during development of its 1998 work plan whether to permanently establish this committee to coordinate future D&D issues. CAB members interested in serving on the committee include Susan Barron, Mary Harlow, Tom Marshall, and David Navarro.

Decision: *Approve establishing ad hoc D&D Committee. APPROVED BY CONSENSUS.*

EXECUTIVE SESSION:

- Long Term Disability Insurance for staff. Tom Davidson, chair of the Personnel Committee, and staff members met with CAB's insurance representative, who provided two quotes from companies to provide long term disability insurance for staff. Both plans are similar in benefits and cost. After that meeting, Tom and staff selected the bid from CAB's current health insurance provider, Humana/ Employers.

Decision: *Approve including disability insurance as a benefit to staff. APPROVED BY CONSENSUS.*

NEXT MEETING:

Date: July 3, 1997, 6 - 9:30 p.m.

Location: Westminster City Hall, lower-level Multi-Purpose Room, 4800 West 92nd Avenue, Westminster

Agenda: * *Various committee recommendations: Highly Enriched Uranium vulnerabilities; privatization issues; Rocky Flats FY99 budget; CAMU Designation Application; T1 Trench PAM*

ACTION ITEM SUMMARY: ASSIGNED TO:

1. Compile summary of comments and questions on CAMU and PAM - Chris Millsaps
2. Finalize and forward recommendation to extend public comment period - Chris Millsaps
3. Finalize and forward letter to Al Alm regarding funding to develop Community Needs Assessment Handbook - Deb Thompson
4. Review DOE comments on WIPP transportation recommendation and provide opportunity for DOE to comment on issues at committee meeting - National Issues Committee
5. Review Board retreat materials prior to June 8 - Board members
6. Set up initial meeting of *ad hoc* D&D Committee - Chris Millsaps

MEETING ADJOURNED AT 10:05 P.M. *

(* Taped transcript of full meeting is available in CAB office.)

RESPECTFULLY SUBMITTED:

Tom Gallegos, Secretary
Rocky Flats Citizens Advisory Board

The Rocky Flats Citizens Advisory Board is a community advisory group that reviews and provides recommendations on cleanup plans for Rocky Flats, a former nuclear weapons plant outside of Denver, Colorado.

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