

Rocky Flats Citizens Advisory Board Recommendation 97-8

**to the U.S. Department of Energy,
the U.S. Environmental Protection Agency,
and the Colorado Department of Public Health and Environment**

Recommendations and Comments on the Proposed Action Memorandum for the T1 Trench

Approved July 3, 1997

Background

The Department of Energy is proposing to remediate a former waste burial trench, T1, at the Rocky Flats Environmental Technology site. Within this trench are barrels containing depleted uranium chips, dry paper trash, and other waste products from the Building 444 operations. During remediation the trench contents will be excavated, the contents stabilized, and soil will be replaced. Having reviewed the Proposed Action Memorandum for the T1 Trench, the Rocky Flats Citizens Advisory Board (RFCAB) feels the following recommendations are necessary.

Recommendations

RFCAB recommends that the T1 Trench utilize and adhere to the relevant aspects of the Cleanup Principles through the course of the project. The Cleanup Principles should be used in conjunction with continuous public involvement to create a partnership in the pursuit of successful project completion. Specifically, the following concerns should be addressed:

1. While the risk of fire due to the potential pyrophoric nature of the material buried in the trench has been reported as low, it is still a factor. Accordingly, RFCAB recommends that the contingency plan for fire be written to include engineering controls to minimize exposures to workers, the public, and the environment.
2. The T3/T4 Trench project showed that air monitoring is an integral part of any excavation project. With that in mind, RFCAB recommends that the air monitoring program for the T1 Trench be designed so that continuous conservative, project-specific monitoring is occurring throughout the project and up to its completion.

3. In conjunction with the T3/T4 lessons learned, a realistic and conservative model of expected releases must be utilized for the project. RFCAB recommends that releases should be reported as percentages of allowable limits and not compared to the model.
 4. RFCAB recommends that a cost benefit analysis be performed to determine whether cleanup to Tier II action levels would be a viable option. If the cost analysis shows it to not be cost prohibitive, RFCAB recommends that the soils in and around Trench T1 be remediated to Tier II soil action levels.
 5. As the potential exists for tighter cleanup levels, RFCAB recommends that the project planning include development of contingency plans responsive to any new standard.
 6. Continued public involvement is important to the decision-making process of this project. Therefore, RFCAB recommends that continued public input be solicited throughout the process of designing pertinent health and safety documents, waste disposal plans, project monitoring plans, and emergency procedures. RFCAB also requests it be kept informed of and be allowed to review interim project documents as they become available.
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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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