

Rocky Flats Coalition of Local Governments

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January 20, 2004

Ms. Dyan Foss
Kaiser-Hill, L.L.C.
Rocky Flats Environmental Technology Site
10808 Highway 93, Unit B, T124A
Golden, CO 80403-8200

Dear Ms. Foss:

On behalf of the Board of Directors of the Rocky Flats Coalition of Local Governments, I am submitting the following comments on the *Building 371/374 Closure Project Decommissioning Operations Plan, Revision 1, Modification 4, December 12, 2003* (DOP modification). The Coalition appreciates the opportunity to provide feedback on this proposed change in the decontamination strategy for building 371 (B371) and building 374 (B374), and we look forward to receiving your written reply.

This proposal to decontaminate the B371/374 basement and sub-basement to the radionuclide soil action levels (<7 nCi/g) and to use controlled explosive demolition represents a significant departure from the earlier plan to decontaminate the entirety of both buildings to the free release standard. The Coalition Board appreciates the briefings the Site has provided over the past two months. Nevertheless, because of a number of outstanding issues that I discuss in this letter, the Coalition Board is not prepared to support the proposed modifications until outstanding questions are addressed to their satisfaction. The Coalition Board believes additional planning is essential before the decision to not free-release the basement and sub-basement and to use controlled explosive demolition techniques is approved by the regulatory agencies.

Remaining Radioactive Contamination Concerns

Although the DOP refers to leaving areas of radioactive contamination at levels less than 7nCi/g, the Coalition Board has concerns with this practice. At the December 2003 and January 2004 Coalition Board meetings, Kaiser-Hill presented current radioactive contamination survey results. Based on this information and the information in the DOP, the Coalition Board is concerned with the practice of obtaining <7 nCi/g compliance by averaging the surface and near-surface contamination through the total thickness of a concrete slab instead of the actual thin layer of contamination. Using this practice, areas of the remaining surface and near-surface contamination entombed in B371 could approach transuranic activity levels (>100 nCi/g). It is the remaining activity level of this thin layer of contamination which concerns the Coalition

Board. Substituting the total thickness of the concrete for the actual thin contamination layer is misleading and not sound public policy.

Demolition Process Alternatives Analysis

As the DOP modification makes clear, the Facility Disposition RSOP requires that the use of explosives must be evaluated for its effect on worker health and safety and the environment, and for its cost-effectiveness, as compared to mechanical demolition techniques. While we understand that the RSOP allows for the DOP modification to be approved prior to the Site conducting such an evaluation, we believe it is premature to decide on a demolition technique without having first answered the issues we outline below.

For starters, page 48, section 4.5.6, provides “Given the structural aspects of Building 371, the use of explosives seems to be the preferred demolition method because it will provide the safest and most cost-effective means of removing the facility. The proposed method of implosion should also minimize adverse environmental effects.” Given that the Site has not yet engaged an explosives demolition subcontractor and that Kaiser-Hill’s strategy for how to ensure residual contamination is not released into the environment is evolving, the Coalition Board questions the basis for the statement that the proposed demolition method “should minimize adverse environmental effects.”

More specifically, while the Coalition Board recognizes that the amount of known contamination remaining in the basement and sub-basement at demolition is low, we remain unconvinced that the latest idea for how to protect this remaining contamination from becoming airborne during demolition will achieve the stated goal. The Coalition Board recognizes that implosion will only be used to demolish free-release areas which will collapse into lower non free-release areas. However, as the free-release upper floors collapse into the basement and sub-basement, the potential exists to dislodge and disperse remaining contamination. As the DOP modification clearly states, these protection measures “may include measures such as covering the areas with gravel and/or soil to prevent damage to the fixatives that prevent contaminants from being dispersed as windborne particles.” “May” is not sufficient to garner the Coalition Board’s support for this demolition method.

At the same time, however, the Coalition Board cannot oppose this proposal to use explosives as we do not have a basis for evaluating the risks to human health and the environment, including Site workers, from this demolition technique versus traditional mechanical means. A more thorough alternatives analysis is essential.

Groundwater Concerns

On pages 49, 50 and 68 of the DOP modification groundwater issues are mentioned. However, absent a completed Kaiser-Hill groundwater modeling plan for B371/374, it is difficult to know what remediation methods will be used. For example, Kaiser-Hill has told us there may be penetrations of the remaining basement structures to allow flow of groundwater through the structures and rubble, or there may not be penetrations. Without a final groundwater modeling plan in place, it is difficult to predict what will actually occur, or what strategy will meet the stated goals of the remediation project.

In addition, page 68, paragraph 8 states, “The mobility of the fixed contamination that could be dislodged during the demolition process is negligible.” While this statement may prove to be true, without additional information the Coalition Board has no basis for judging the accuracy of this important conclusion.

Towards this end, the Coalition Board requests that the following questions be addressed:

- After demolition, can Kaiser-Hill guarantee that there will be adequate fill-in of the basement and sub-basement voids such that groundwater will not be able to move small, particulate radioactive contamination through void channels in the rubble to the subsurface boundary?
- Are there any groundwater VOC plumes in the B371/374 vicinity that will be impacted by the selection of structure perforation vs. non-perforation?
- If no structure perforation is selected, what is the impact of water infiltration through the cap, especially during very wet years?

In addition, absent the completed groundwater modeling study and approved demolition strategy, impacts to groundwater and surface water are not completely characterized.

Stewardship

The absence of any type of long-term stewardship planning is quite disconcerting, especially considering the uncertainty related to leaving contamination onsite and the uncertainty surrounding demolition and groundwater. As we have commented in reviewing previous decision documents, stewardship is of great importance to the Coalition Board and must be integrated with remedy selection decisions to ensure the long-term protection and viability of selected remedies. The consideration of long-term impacts to human health and the environment should be part of a more thorough alternatives analysis.

Additionally, a stewardship section must be added to the document to take into account long-term stewardship activities such as surveillance, monitoring if needed, record keeping, as well as identification of physical and institutional controls. This information should be captured here, and then built upon in future documents such as the closeout report and the enforceable post-closure RFCA.

Air Quality Questions

On page 64, section 8.0, paragraph 5, the DOP modification states, “Air quality impacts will be related to particulate emissions, but emissions will be controlled by mitigation measures and will be short-term in duration.” Without having consulted an explosives demolition subcontractor, how can Kaiser-Hill be confident that during demolition no airborne dispersal of dislodged radioactive contamination is possible. Once again, the Coalition Board is struggling with how Kaiser-Hill can rely on some type of protective barrier during demolition activities (especially if controlled explosive demolition is selected) to contain potential airborne dispersal of contamination when this method has yet to be fully evaluated.

As a final matter, over the past two months various site personnel have commented to Coalition staff that the B371 remediation should not cause concern as it pales into comparison to the Building 771 remediation. The Coalition Board would like to remind all involved that (1) we

continue to be concerned about the 771 remediation strategy, and (2) the Coalition emphatically opposed the RFCA parties adoption of the cleanup levels for contaminants found 3' below grade or deeper. We did not support the 3nCi/g cleanup level for 3'-6' below grade, nor the 7nCi/g level that is becoming the *de facto* cleanup level for contaminated basements. Towards this end, the Coalition Board remains concerned that in the rush to beat the 2006 cleanup goal, DOE and Kaiser-Hill are yet again proposing leaving unacceptable levels of residual contamination at closure.

Thank you for the opportunity to comment on this document and for your continuing commitment to work with the Coalition on the safe and timely closure of Rocky Flats. If you have any questions about the Coalition's comments, please call me at (303) 412-1200.

Sincerely,

/s/

David M. Abelson
Executive Director

cc: Joe Legare, DOE
Steve Gunderson, CDPHE
Mark Aguilar, EPA
Kelly Trice, Kaiser-Hill
Randy Leitner, Kaiser-Hill
John Corsi, Kaiser-Hill
Rocky Flats Coalition of Local Governments
Rocky Flats Citizens Advisory Board