

Rocky Flats Coalition of Local Governments

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June 3, 2003

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 *Draft Building 776/777 Decommissioning Operations Plan, Appendix I, Demolition Plan* (DOP Modification). The Coalition appreciates the opportunity to provide feedback on this important document and we look forward to receiving your written reply.

The Coalition considers itself a partner with Kaiser-Hill and the Department of Energy in achieving the safe cleanup and closure of Rocky Flats. We appreciate the Site's continuing commitment to working with us on this document and others. The demolition of B776 presents a number of unique challenges, and we appreciate the Site's willingness to discuss local government concerns.

This draft of the DOP Modification provides much of the required information for how the demolition will be conducted, and it addresses many of the concerns the Coalition Board and staff raised with you in prior discussions. The Coalition requests clarification, however, on the following issues.

General Comments

The Coalition understands the challenges facing the Site in demolishing B776/777, stemming from the fact that portions of the building cannot be free-released. The Coalition strongly supports the Site's goal of maximizing worker safety and minimizing the release of contamination during this demolition. With this support in mind, we offer the following comments on air monitoring, beryllium monitoring, and independent verification and validation. Specific comments follow these general comments.

Air Monitoring

At the February 24, 2003 Coalition Board meeting, Mark Ferri committed to performing close-in monitoring during the B776 demolition. At the April 29, 2003 B776 meeting, Kaiser-Hill personnel told local government and Coalition staff that close-in monitoring would be performed during the B776 demolition in two zones. The inner zone around B776 would be designed to protect B776 workers, and the outer zone would be used to establish work boundaries for collocated workers near the demolition area. The DOP Modification includes language regarding the use of performance monitors on the Industrial Area perimeter, as well as ambient air monitors at the Site boundary, but does not identify the use of close-in monitors. Please include language in the DOP Modification that describes the close-in monitoring to which Kaiser-Hill committed, including the purpose, location, and timeframe for the monitoring.

In addition, the Coalition understands that CDPHE has committed to performing additional air quality monitoring for the B776 demolition. This commitment is not identified in the DOP Modification. While we know the particulars of their monitoring program cannot be determined at this point, we think general language must be added to the DOP Modification that clearly identifies the purpose and scope of their air monitoring.

Beryllium Monitoring

The Coalition understands that B776 is contaminated with beryllium, but that specific beryllium air quality standards do not apply to the B776 demolition. We also understand Kaiser-Hill has committed to applying lessons learned from the demolition of other beryllium buildings (such as B883 and B865) to determine if beryllium sampling and/or monitoring are warranted for the B776 demolition. This process is not documented in the DOP Modification. Please add language to this effect.

Independent Verification and Validation (IVV)

The original B776 DOP (Section 4.7) states that “an independent party, selected by DOE, will perform a verification assessment of the final survey methodology.” This commitment was made assuming B776 would be an unrestricted release building. The Coalition understands the Site is reassessing the value of IVV for B776, given that Kaiser-Hill has said decontamination to unrestricted release standards does not appear to be technically feasible for many areas of the building.

At a minimum, the Coalition believes IVV should be performed for those areas that can be free released. A decision on whether or not to perform IVV on areas that cannot be free released should be based on a comprehensive analysis that will determine how much value IVV will add. This analysis should be identified and outlined in the DOP Modification.

Specific Comments

Section 3.0, Pre-Demolition Activities and Methods

The Coalition understands that contamination levels are described subjectively as “low”, “medium”, and “high” in this section of the DOP Modification to give a general idea of how decontamination decisions will be made. Nevertheless, without any guidance for what constitutes “low” versus “high”, we are concerned the decision to decontaminate, encapsulate, or remove will be largely subjective. Who will decide whether contamination levels are low,

medium, or high? On what are these levels based? Gross contamination levels? Potential health impacts? Other? What will be the general framework for determining how contamination levels, and thus decontamination strategies, will be decided?

Section 4.1, Regulatory Framework and Assessment

“If the modeling indicates that a level of 0.1mrem will be exceeded at the Rocky Flats fenceline because of demolition of Building 776/777, additional decontamination and/or removal will be performed.”

The Coalition understands the DOP Modification primarily addresses fenceline protection because the DOP addresses compliance with RFCA, which is predominantly based on public and environmental protection. Worker protection, we understand, is addressed by other onsite programs and federal regulations. When Melissa asked in a prior discussion with you whether worker dose would trigger any such action, or just the fenceline dose, your response was that worker protection requirements will trigger actions in addition to the fenceline dose. Please describe when worker dose would trigger an action, and what those actions may include.

Section 4.2, Building 776/777 Project Specific Final Characterization

“The measurements that will be performed during final characterization will be total surface contamination.”

As written above, it is clear that Kaiser-Hill plans to characterize the surface of B776 prior to demolition. It is not clear that characterization efforts will also take into account embedded contamination (such as in cinder blocks). The total amount of contamination remaining in B776 before demolition is obviously a key input into air modeling and subsequent worker and public protections, and as such, must account for both surface and embedded contamination. Based on Melissa’s prior discussion with you, the Coalition understands the final characterization plan for B776 will in fact address both surface and embedded contamination. This commitment should be clearly identified in the DOP Modification. As the document reads now, embedded contamination will not be taken into account when determining final contamination levels.

Section 7.0, Transition to Environmental Restoration

(1) *“Sanitary sewer lines, tanks, and ancillary equipment will be removed, including building slabs and foundations.”*

Footing drains are not addressed in this section of the DOP Modification. The Coalition understands, however, that footing drains will be dispositioned based on input and guidance from the Environmental Restoration (ER) team, taking into account the post-closure water balance and movement of groundwater and contaminants. Given the importance of water quality to our communities, we believe footing drains should be acknowledged in the DOP Modification. Please add language identifying that the decision to remove or retain footing drains will be made based on input from ER, describe on what the decision will be based, and identify who will then carry out the chosen action (removal vs. retention).

(2) *“Structural material within three feet of the final grade will be removed, including building slabs and foundations. Structures below three feet of the final grade will be characterized and removed if necessary per site requirements.”*

At the February 24, 2003 Coalition Board meeting, Mark Ferri stated that the B776 D&D team would take out the thirty foot pits (from buried metal and stairwells) in the building during demolition. The commitment to remove these pits is not made clear in the DOP Modification, as most of the pits are likely more than three feet below grade and may not qualify for removal as per the quote above. The Coalition believes the decision to remove the pits should be clearly outlined in the DOP Modification so that anyone who works with this document will be aware of Kaiser-Hill’s commitment.

(3) *“Before making the decision to leave any unrestricted-release slabs in place, Building 776/777 project management will coordinate with ER on their soil sampling and remediation plans.... Remediation of the under building contamination is expected to follow slab removal.”*

Is the implication of this sentence that unrestricted release slabs will be left in place if the levels of under building contamination do not warrant soil remediation? If so, does this statement apply only to slabs deeper than three feet below grade? If not, what are the decision criteria for leaving an unrestricted release slab in place? Are there instances when a non-unrestricted release slab would be left in place? If so, what are the decision criteria for removing or leaving them?

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: Mark Ferri, Kaiser-Hill
John Schneider, DOE
Gary Schuetz, DOE
Steve Gunderson, CDPHE
Tim Rehder, EPA
Rocky Flats Coalition of Local Governments
Rocky Flats Citizens Advisory Board