

Rocky Flats Coalition of Local Governments

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Mr. Fred Gerdeman:

The Rocky Flats Coalition of Local Governments ("Coalition") appreciated this opportunity to comment on the draft "RFCA Standard Operating Protocol for Recycling Concrete". As you know, the Coalition hired Parallax, Inc. ("Parallax") to assist in its efforts to understand the concrete recycling proposal and to provide informed comments. Following a review of available information, interviews with Site personnel, and tours of Site facilities, Parallax has prepared a report with their findings and recommendations. The attached draft report represents the findings of our consultant — the Coalition's comments and recommendations, provided below, reflect and build upon many of Parallax's findings.

Parallax determined that the RSOP, in its current form, lacks the necessary information to adequately assess the potential impacts of concrete recycling on human health and the environment. The two documents that will define the procedures for radiological characterization ("RFETS Decontamination and Decommissioning Characterization Protocol") and pre-demolition sampling ("Site-Wide Pre-Demolition Survey Plan") are referenced in the RSOP, but the documents are still under development. Without the final, regulator-approved versions of these documents, Parallax could not determine with sufficient certainty that free-released buildings, when demolished, would indeed produce rubble that is protective of human health and environment. In their draft report, Parallax concludes "the issue of 'free-release' underpins the entire process and must be resolved in order to approve the proposal."

Parallax also found insufficient data in the RSOP to validate the projected financial, safety, and environmental benefits of the concrete recycling option. With a detailed cost analysis of the various disposal options, the Coalition can fully examine the benefits and drawbacks of concrete recycling versus off-site disposal, and render a decision based on facts, not just concepts.

The remainder of Parallax's draft report examines aspects of RSOP implementation, and the related recommendations prescribe supplementary monitoring and maintenance activities that will provide an increased "comfort level" for Site workers and adjacent communities if the RSOP is implemented.

The following are the comments and recommendations of the Coalition.

Content of RSOP

The RSOP, much as the interim TRU storage environmental assessment also recently released for public comment, does not contain sufficient information. The Coalition cannot prepare substantive comments or develop informed recommendations for draft documents that do not provide the necessary information to fully evaluate the actions proposed therein. The two documents that detail the procedures for characterizing and confirming the cleanliness of structural surfaces prior to building demolition are still under development. Without these documents, the Coalition cannot determine with the necessary degree of certainty that buildings will be adequately decontaminated to the NRC free-release standard, and consequently ensure the resulting building rubble will not represent a risk to worker and public health. For that reason, the Coalition cannot support the RSOP at this time. Instead the Coalition expects DOE will provide the Coalition with all supporting documents as they are developed.

Details of Cost-Benefit Analysis

The RSOP does not contain a complete explanation of the cost-benefit analysis for on-site versus off-site disposition. DOE and/or its contractors should clarify for the Coalition the calculations and rationale used to validate the environmental, safety, and cost advantages of on-site rubble disposition. DOE will likely save a significant amount of money by implementing on-site concrete recycling, while the local communities will bear any resulting known or unknown residual risks. The Coalition would be more inclined to accept the idea of on-site rubble disposition if DOE commits the savings it realized to activities that improve the overall cleanliness and future use value of the Site.

Sampling Quality Assurance

An independent sampling verification and quality assurance program should be implemented during pre-demolition building survey for all buildings in which contamination was detected during building decommissioning characterization.

Residual Activity in Building Rubble

If the rubble recycling RSOP is implemented, a statistically valid rubble sampling plan should be developed and implemented that confirms the average residual activity in building rubble does not exceed the standards for subsurface soils stipulated in the RFCA Action Level Framework. In no case should the results of any one sample exceed two times the applicable action level.

Air Monitoring

During performance of all aspects of the RSOP, radiological air monitoring should be employed to demonstrate full compliance with the Clean Air Act. Radiological air monitoring should be performed and appropriate protective equipment should be provided for all workers during any potentially dust-generating concrete recycling operations (i.e. demolition, stockpiling, crushing, and backfilling). The Site must meet the CDPHE requirement for zero fugitive dust emissions during all concrete recycling operations, including rubble stockpiling and stockpile maintenance.

Rubble Stockpiles

Rubble stockpile should be located on impermeable surfaces so that percolating waters and suspended solids are captured. Accumulated water and rubble-derived fines should be characterized as "clean" via sampling and analysis prior to release or disposal.

Recycled Rubble Backfill Sites

Recycled rubble should only be used in the basement areas of Building 771 and 371/374. To avoid any potential effects or limitations on future use in the Industrial Area, recycled rubble should be used as fill material exclusively in the Protected Area. Groundwater monitoring wells should be installed around the perimeter of areas backfilled with recycled rubble. Groundwater monitoring should begin immediately following the emplacement of recycled rubble, and should continue as part of the post-closure long-term site stewardship program.

To reiterate, due to the lack of detailed information provided by the Site thus far on the proposed concrete recycling activities, the Coalition cannot support the RSOP at this time. The Coalition is ready to continue working closely with the Site on rubble disposition. With additional information and dialogue, DOE and the community will likely be able to find the common ground necessary to resolve this issue in a manner satisfactory to all.

Again, thank you for this opportunity to provide input.

Sincerely,

/s/
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Jefferson County

/s/
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City of Westminster

/s/
Mike Weil
City of Boulder

/s/
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/s/
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Cc: Ms. Jessie Roberson, DOE-RFFO
Mr. Bob Card, Kaiser-Hill