



Department of Energy
National Nuclear Security Administration
Service Center

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MEMORANDUM FOR: David W. Geiser, Director
Office of Policy and Site Transition

FROM: *Henry M. De Graca*
Henry M. De Graca, Manager
Oakland Environmental Programs Division

SUBJECT: Geothermal Test Facility (GTF) Closure and Records Transfer

The purpose of this memorandum is to document the closure of the Geothermal Test Facility (GTF) and transfer the ownership and custody of records from the Oakland Environmental Programs Division (OEPD) to the Office of Legacy Management (OLM).

The GTF near El Centro, California, consisted of remediation and removal of the brine and spray ponds, and returning the pond area to a natural state. The work was done through an interagency agreement with the United States Army Corps of Engineers (USACE). DOE Office of Environmental Management (EM) completed remediation of the brine pond in FY1997. The site was then transferred back to the Office of Energy Efficiency (EE) which transferred the site back to the Bureau of Land Management (BLM). The interagency agreement has been closed out and there are no future/potential liabilities.

As agreed upon with the OLM team who came to coordinate the transition effort with OEPD two weeks ago, we are providing our response to the Site Transition Framework for Long-Term Surveillance and Maintenance for GTF (Attachment A). Due to the nature of the project, our responses were mostly Not Applicable (N/A). Attachment B is the list of records (two boxes) that we are shipping from OEPD, Oakland Office to Grand Junction, Colorado. Attachment C is the list of five additional boxes of GTF inactive records located at the Federal Records Center, San Bruno, California.

Should you need additional information regarding this transfer of records, please call me at (510) 637-1617 or John Lee at (510) 637-1598.

Attachments:

As Stated

cc: Gene Schmitt, EM-20
Jeff Short, LM-40
Jay Rhoderick, EM-43
Arthur W. Kleinrath, LM-50
Jane Powell-Dolan, LM-50

Attachment A – Site Transition Framework for Long-Term Surveillance and Maintenance for GTF

SITE TRANSITION FRAMEWORK FOR LONG-TERM SURVEILLANCE AND MAINTENANCE FOR

GEOTHERMAL TEST FACILITY

REVIEW ITEM	COMPLETED	N/A	COMMENTS
I. Authorities and Accountabilities are Assigned and Documented:			
<ul style="list-style-type: none"> All interested parties' assignment of accountability and authority for long-term surveillance and maintenance has been identified and documented. 		X	GTF has no Long Term Surveillance & Maintenance activities.
A. All documents allocating the roles and responsibilities of interested parties have been approved and signed (e.g., Memorandum of Agreement, Memorandum of Understanding, Interagency Agreement, Cooperative Agreement).		X	
B. Each federal or non-federal entity responsible for long-term surveillance and maintenance activities listed in section I(A) have been identified. Funding sources for each activity have been identified.		X	
C. Appropriate governmental policies and procedures for managing resources are incorporated into the long-term surveillance and maintenance plan and agreements.		X	
D. The legal authority under which long-term surveillance and maintenance will be conducted has been identified and documented or a "reservation of rights" has been indicated.		X	
E. Authorities relating to Institutional Controls are further discussed in paragraph IV.		X	
II. Site Conditions are Accurately and Comprehensively Documented:			
<ul style="list-style-type: none"> All documentation identifying site historical uses, characterization, and remedial action, including the Preliminary and Final Closeout Reports have been completed and made available to the public. Where available, the information identified in this section should be of survey quality and have Global Information Systems (GIS) references. 	X		GTF Closure Report has been completed 1998 (Reference: Closure Report, East Mesa Geothermal Test Facility, July 31, 1998). The report was not made available to the public but is among the records sent to GJO and in OAK Integrated Site Closure System. Contact OAK EM for access.
A. The site at the time of closure, including all remedies and remaining hazards, has been described. Examples include:		X	
1. Physical features of the site, including, site topography, geology, hydrogeology, geomorphology, seismicity, site and area boundaries, and other features relevant to the long-term performance of the site.		X	
2. Locations of active, inactive, and decommissioned buildings, structures, and surface and subsurface infrastructure (e.g., utilities)		X	
3. Locations of residual hazards and associated engineered and institutional control systems.		X	
4. Locations of groundwater wells, wastewater outfalls, and air quality monitoring stations. Information has been depicted on site maps.		X	

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REVIEW ITEM	COMPLETED	N/A	COMMENTS
5. For those sites undergoing closure, locations of off-site buildings and structures, important ecological resources, and associated potential receptors in the vicinity of the site.		X	
6. Characteristics of the remaining contaminants (e.g., radionuclides, activity, and physical form).		X	
7. Describe the initial risk at the site and the risk remaining at the site following remediation. This will be used to provide a reference baseline.		X	
8. The existence of a "No Further Action" decision should be indicated.		X	
B. For those sites undergoing closure, a conceptual site model for long-term surveillance and maintenance has been completed (if deemed applicable), showing the relationships between existing residual hazards, environmental transport mechanisms, exposure pathways, and human/ecological receptors.		X	
C. All remedial action(s) and associated documentation have been completed and approved by regulators.	X		
D. Results of any Natural Resource Damage Assessment claims, where applicable, performed with associated documentation has been identified. This assessment should discuss the Department's potential environmental liability at the site.		X	

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REVIEW ITEM	COMPLETED	N/A	COMMENTS
III. Engineering Controls, Operation & Maintenance Requirements, and Emergency/Contingency Planning are Documented:			
A. Engineered controls have been identified and documented, information should include:		X	GTF has no post-closure Operation & Maintenance requirements.
1. Design and construction drawings, specifications, and completion report.		X	
2. Site physical and geotechnical data.		X	
3. Locations of engineered controls accurately identified and depicted on site maps.		X	
4. Identification of on-going remediation and related waste management activities.		X	
5. Performance history assessments indicating successful operation.		X	
6. A life-cycle cost estimate, including basis and assumptions. The life-cycle cost estimate should be based on best available data but should also include a reasonable and prudent amount for future contingencies, recognizing that in most cases the long-term surveillance and maintenance activities may be on-going until such time that no hazards remain to human health and the environment.		X	
7. A master schedule of on-going activities has been made available, including exit criteria outlining if and/or when engineered controls are no longer necessary. If exit criteria will be implemented while hazards to human health and the environment remain, a Probabilistic Risk Assessment (PRA) over several half-lives should be provided to justify the exit strategy and the discontinuance of the engineered controls.		X	
B. Operations & Maintenance (O&M) activities have been documented, funding is in place, and a party has been selected to perform the necessary activities.		X	
1. Surveillance and monitoring requirements have been documented (e.g., scope, frequency, reporting, process descriptions, and analytical parameters and methods). This document should allow for optimization that is consistent with the selected remedy.		X	

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REVIEW ITEM	COMPLETED	N/A	COMMENTS
2. The cost, including basis and assumptions, of operations, maintenance and surveillance activities has been estimated, documented, and revised periodically as experience dictates. The request for funding is in accordance with applicable budget appropriation procedures.		X	
3. An agreement and/or contract is in place for performance of all O&M activities during long-term surveillance and maintenance if an outside party will be performing these activities.		X	
C. Emergency/Contingency planning and the authority and responsibilities to implement have been identified.		X	
1. Uncertainties associated with residual hazards, fate and transport mechanisms, exposure pathways, and the effectiveness of long-term surveillance and maintenance activities have been identified.		X	
2. Scenarios related to each uncertainty have been identified (e.g., failure scenarios).		X	
3. Roles, responsibilities, and procedures to respond to each scenario have been established.		X	
4. The conceptual site model developed in support of the remedial action or closure decision should be routinely reviewed, updated and re-evaluated based on new technical information and on monitoring data collected during stewardship of the site.		X	
A. Land Use/Institutional Controls have been identified, approved by the regulator(s) (if applicable) and implemented. All institutional control components of each implemented remedy are described (e.g., future lands use assumptions upon which each implemented remedy is based, associated land use restrictions). If engineered barriers are relied upon as part of the remedy requiring institutional controls, assumptions regarding the longevity and performance of these barriers should be identified.		X	GTF requires no Land Use/Institutional Controls.
1. On-site and off-site land uses for each area (property) and its associated land use assumptions have been identified.		X	
2. Procedures for managing, assessing potential changes in, and enforcing on-site and off-site appropriate land uses have been documented and are being conducted.		X	

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REVIEW ITEM	COMPLETED	N/A	COMMENTS
3. Institutional controls established as part of an implemented remedy have been identified and a process is in place to monitor and document these institutional controls.		X	
4. Roles and responsibilities have been outlined for responding to requests to change existing land uses that is inconsistent with the land use assumed during implementation of the selected remedy.		X	
5. Procedures have been put in place for periodic review of land uses and institutional controls to ensure that they are being maintained and remain protective. Performance history indicating successful operation has been documented.		X	
6. Procedures for management and periodic reassessment of institutional control restrictions are in place.		X	
7. Off-site easements implemented to ensure the protectiveness of the remedy have been documented and a process in place to enforce/maintain these easements.		X	
8. Exit criteria outlining when engineered controls/institutional controls are no longer necessary has been documented, if not previously documented in the ROD.		X	
B. Property records (as required by applicable regulations and/or guidance) are complete.		X	
1. The site's real estate history has been documented, including identification of former property owners, deed restrictions, or other land use restrictions.		X	
2. Site boundaries and site markers are easily identified and documented.		X	
3. On-site and off-site easements, rights of way, and other property access rights have been established and documented.		X	
4. Water, mineral, and other natural resource rights have been identified.		X	
5. Tribal treaty rights and other U.S. Government obligations have been identified.		X	
6. Areas where long-term surveillance and maintenance activities will be conducted have been documented in the property records.		X	
V. Regulatory Requirements and Authorities are Identified:			

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<p>* Regulatory requirements regarding residual contamination have been identified. Pertinent regulatory documents are maintained and available to the public (e.g., Records of Decision, RCRA Permits and Corrective Action Decisions, Consent Orders, Interagency Agreements, Federal Facility Agreements).</p>		X	GTF has no residual contamination.
<p>A. All regulatory decision documents and associated site characterizations have been identified and are either complete or scheduled for completion (e.g., all remedial action activities regarding the soil have been completed, but the impacted groundwater is in the process of being resolved) and are maintained in accordance with regulatory requirements.</p>		X	
<p>B. The implemented remedy and associated long-term surveillance and maintenance activities are verified to be in compliance with all regulatory requirements (e.g., appropriate agreements have been entered into with appropriate regulators).</p>		X	
<p>C. Five-Year Review results have been made available. Future periodic reviews (not to exceed five years), including supplemental analysis of site-wide Environmental Impact Statements (if applicable and/or required), should be planned and consistent with existing guidance.</p>		X	
<p>D. EPA NPL Status and/or RCRA permit status have been clearly indicated (e.g., de-listing, partial de-listing, non-NPL).</p>		X	
<p>E. NRC License Status has been established. This should identify the license holder and the development of license transfer plans.</p>		X	
<p>F. Locations of documents have been identified and made accessible. A process is in place to ensure that the documents are maintained and kept current (e.g., new technology updates for records management).</p>		X	

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VI. Long-Term Surveillance and Maintenance Budget, Funding, and Personnel Requirements are Identified:			
• Sites should be consistent with and follow their prescribed guidance in determining budget, funding, and personnel requirements. Some of the elements in this section may not apply.		X	GTF has no Long Term Surveillance & Maintenance requirement.
A. A technical baseline document for long-term surveillance and maintenance programs and activities at the site has been developed.		X	
B. Funding (consistent with technical baseline).		X	
1. Any funds for long-term surveillance and maintenance have been identified and are made available.		X	
2. Estimates for the annual funding requirements for long-term surveillance and maintenance activities, associated oversight, and information management requirements have been derived and have been included in the Annual Budget Request to Congress.		X	
3. Funding assurances have been made based on those estimates.		X	
4. Mechanisms to transfer funds required for long-term surveillance and maintenance have been established.		X	
5. Funding mechanisms for long-term surveillance and maintenance activities and regulatory oversight activities conducted by other federal and non-federal entities have been established (e.g., documentation of financial assurance agreements for long-term monitoring and surveillance funding).		X	
6. Estimates required for financial assurance payments have been determined.		X	
7. Authority has been granted to the steward to use, or have access to, funds related to long-term surveillance and maintenance.		X	
C. Personnel requirements have been identified (for activities not previously addressed within this set of criteria).		X	
1. All personnel functions and qualifications necessary for the technical implementation and administration of long-term surveillance and maintenance activities have been identified.		X	
2. A determination for the need of other on-site personnel has been made by identifying the specific duties that may be required.		X	

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3. A closeout plan for the disposition of excess federal full time equivalents has been developed.		X	
D. A business close out process has been developed.	X		The business closeout process and checklist for GTF are maintained in an Odeand Integrated Closure System website (http://www.ce2corp.com/odc/odc/index.asp) Contact OAK E&I for access.
VII. Information and records management requirements are satisfied.			
A. The Transfer of Information and Records.	X		GTF Records were shipped to Grand Junction (2 boxes). Five boxes of GTF records are in the Federal Records Center at San Bruno, California.
1. Agreements are in place that specify records that do not transfer to LM (e.g., current contracts records, current litigation records, TRU waste related records, etc.)		X	GTF has no litigation nor TRU waste records. Contract is closed and retired by the Army Corp of Engineers. The GTF remediation work was executed via interagency agreement. For Reference: Contract No. DACW45-94-D-0005, Delivery Order No. 0038.
2. Information and records needed for legacy management activities, including long-term surveillance and maintenance, property management, and government-owned contractor-operated (GOCO) pensions, annuities, and benefits, have been identified.		X	GTF has no LTS & M requirement.
3. Policies and procedures for the transition of information systems and records have been established consistent with the "LM Information and Records Management Transition Guidance."	X		We followed OLM Guidance.
4. The guidance and operations information for information systems, including meta-data, have been identified and transferred along with the information systems.		X	
5. A Site Information and Records Transition Plan has been developed and approved, which establishes a framework to address site-specific records and information requirements, including storage locations, special handling needs, spatial data, and access and retrieval requirements.		X	We followed OLM Guidance.
6. The location(s) for storage and maintenance of site records and information systems has been identified and approved.	X		Per OLM, record were shipped to GJO.
7. An LM records tracking system has been implemented and standards for data formats, finding aids, and indices have been provided to the transfer site.		X	To be established by OLM.

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8. Information from the transfer site's records tracking systems have been migrated to the LM tracking system, along with other finding aids and indices.		X	
B. Information and records management planning has been performed and is acceptable to the stakeholders, as required under regulatory requirements for stakeholder involvement and public availability.		X	
1. Systems and procedures for the archival of long-term surveillance and maintenance information in one or more on-site or off-site repositories have been developed.		X	
2. Retention schedules that are appropriate for the management of information for long-term surveillance and maintenance and other Legacy Management needs have been developed.	X		We followed DOE Environmental Records Schedule, March 1999. Records were scheduled under Under ENV PROG CASE FILE (ENV1-k-2-b)
3. Systems and procedures to establish and facilitate public access to and retrieval of records and information critical to long term surveillance and maintenance are in place. Examples could include, but are not limited to, internet access, local library, on-site information center (e.g., Interpretive Center, Museum, etc.), etc.		X	
4. The National Archives and Records Administration (NARA) has been engaged, through the DOE Office of Chief Information Office, to approve any transfer of records past their retention dates, or the loan of current records to organizations outside of DOE.		X	
5. The DOE librarian and DOE historian should be consulted regarding the transfer of non-record materials, such as library materials and other items that may have historic value, before agreements are made regarding their transfer to non-DOE entities.		X	GTF has no library materials.
6. Classes of long-term surveillance and maintenance information users and their access requirements have been identified and solutions have been implemented.		X	GTF has no LTS & M.
VIII. Public Education, Outreach, Information and Notice Requirements are Documented and Satisfied:			
• Any community involvement and associated community relations plans should be governed by existing participation standards and systems.		X	No community relations plan required
A. List of site stakeholders with associated address information has been developed and a process is in place for updating this list.		X	

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B. Annual or more frequent updates of the administrative record and on-site information repository are made available to interested parties. Community involvement tools have been developed (e.g., fact sheets, newsletters, email notifications, public meetings, etc.).		X	
C. Costs associated with public involvement have been estimated (e.g., oversight committees, meeting locations, etc.). Funds sufficient for public involvement are included in the funding requests.		X	
D. Updates of the administrative record/information repository on-site are annually (at a minimum) made available to interested parties.		X	
Requirements for Cultural Resources			
A. A discrete system or process is in place to protect information about sensitive and natural resources from inappropriate or unauthorized use or access.		X	No natural, cultural and historical resources.
B. Biological resources, threatened and endangered species, archeological and cultural resources, Native American treaty rights, and/or other natural and cultural resources requirements have been identified and satisfied.		X	
C. Locations and characteristics of natural and cultural resources, needing long-term surveillance and maintenance, have been identified (e.g., precise locations and characteristic of cultural and natural resources that require long-term surveillance and maintenance have been identified). A management system is in place and operating successfully.		X	
Requirements for Worker Pension and Benefits			
A. Determination has been made for who will be responsible the administration of:		X	No worker pension plan and benefits to administer when project closed.
1. Retiree benefits and pension fund(s)		X	
2. Workforce transition services		X	
3. National Defense Authorization Act for Fiscal Year 1993, Section 3151 Tuition Reimbursement Program and Relocation and Entrepreneurial Resource Program		X	
B. Current Contractor Pensions and Benefits needs are identified and planned		X	
1. Information about current benefit plans has been obtained		X	
2. Post-closure benefits administrator is identified and appointed		X	

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3. Employment dates, salary, and clearances verified		X	
4. Personnel-related databases (including manual systems) and records responsibility identified		X	
a. Employment history and Personnel Files		X	
b. Historical radiological dose records		X	
c. Medical Records		X	
d. Retiree pension and benefit records		X	
e. Clearance History Files		X	
f. Training Records		X	
5. Scope for reconciling the accounts identified		X	
C. All claims related to the following areas have been resolved (Note: Responsibility rests with EM and is a contract closeout issue, but may affect ability to transition to LM)		X	
1. Pollution Liability Policy		X	
2. Auto Liability Policy		X	
3. General Liability Policy		X	
4. Fiduciary/Crime/Medical Malpractice Liability Policy		X	
5. Government Rating Plan (GRP) for Workers Compensation		X	
6. Non-GRP Workers Compensation Claim		X	
7. Unresolved Hourly Employee Claims		X	
8. Beryllium Liability Claims		X	