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Department of Energy

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FEB 23 1994

94-DOE-02160

Mr Martin Hestmark
U S Environmental Protection Agency, Region VIII
ATTN Rocky Flats Project Manager, 8HWM-FF
999 18th Street, Suite 500
Denver, Colorado 80202-2405

Mr Gary Baughman
Hazardous Waste Facilities Unit Leader
Colorado Department of Health
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Gentlemen

Please find attached for your information, minutes from the Programmatic Feasibility Study (FS) steering group meeting held January 21, 1994 These minutes will be submitted to the Administrative Record after your review

If you have any questions, please contact Scott Grace at 966-7199 or Eric Dillé at 966-4651

Sincerely,

Jessie Roberson
Acting Assistant Manager for
Environmental Restoration

Enclosure

Best Available Copy

ADMIN RECORD

SW-A-003536

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G Baughman & M Hestmark
94-DOE-02160

cc
A Rampertaap, EM-453
E Dillé, AEI
J Hopkins, EG&G
P Laurin, EG&G
B Fraser, EPA
J Schieffelin, CDH
S Stiger, EG&G

MEETING MINUTES CMS/FS PROGRAMMATIC TASKS

DATE January 21, 1994

LOCATION EPA Eagle Room, Denver

ATTENDEES J Hopkins, D Schubbe of EG&G, B Fraser of EPA, J Swanson, D Norbury and J Schieffelin of CDH, E Dille, T Greengard and M Guillaume of DOE, and T Shangraw of Engineering-Science, Inc

NARRATIVE An agenda for this meeting was provided by DOE and is attached to the minutes, as are all hand-outs The items discussed followed the agenda and hand-outs, generally

John Hopkins of EG&G led the discussions on the CMS/FS approach Key points raised concerning TM-1 were

- DOE preferred to proceed with TM-2 immediately following submittal of TM-1, even though ARARs might not be resolved EPA (Fraser) agreed with this approach

- DOE desired to meet with EPA during development of TM-1 to address PRG issues DOE (Hopkins) proposed that PRGs be developed for COCs, using RAGS Part B guidance CDH (Schieffelin) expressed concern that toxicological data might not be available for all COCs CDH suggested use of preliminary COCs (PCOCs), as opposed to COCs It was agreed that PCOCs versus COCs was a semantical issue, that PCOCs would be used CDH also suggested that PRGs be addressed programmatically in TM-1 DOE (Hopkins and Greengard) offered to consider this approach, based on the trial use of OU-2 (Note - a parallel discussion concerning derivation of risk-based PRGs occurred later during the meeting and is addressed later in these notes on Other Issues)

- EPA (Fraser) questioned where in the CMS/FS process was the trigger for needing to perform a feasibility study DOE (Guillaume and Hopkins) responded that all OUs would proceed to TM-1, then it would be decided whether or not a no action alternative would be appropriate EPA (Fraser) agreed with this approach

Key points raised concerning TM-2 were

- DOE (Hopkins) stressed that EPA/CDH would need to be involved in the development and screening of initial list of alternatives Regulatory agreement on the list of alternatives was very important prior to performance of the detailed analysis of alternatives (DAA)

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Key points raised concerning the CMS/FS Report were

- EPA/CDH/DOE need to reach conclusions on the level of modeling required during the DAA.

- Alternative evaluation criteria need to be clearly understood among EPA/CDH/DOE prior to performing the DAA.

- EPA/CDH/DOE will need to coordinate closely on selection of a preferred remedy

- EPA (Fraser) requested that DOE retain the contractor that performs the DAA to write the proposed plan, and that that contractor should also follow through with ROD support and public hearings DOE (Hopkins) agreed in the interest of continuity

- EPA (Fraser) and DOE (Hopkins) agreed that the draft FS report, including comments and response to comments should become the basis of the proposed plan A final FS may therefore not be required

Key points raised concerning the Programmatic work scope and schedule, both issued during the prior meeting were

- First, CDH/EPA agreed with the CMS/FS work scope as proposed by DOE

- EPA (Fraser) raised several questions on the overall schedule, including

  - Contractor procurement issues were unclear
  - Was unclear what the ARARs tasks tied to
  - Review cycles were too long - too many drafts Suggested reducing sequential reviews to concurrent reviews
  - Screening of alternatives, preparing Task 8 report, and development of TM-2 were somewhat redundant, and could be consolidated

- EPA/CDH expressed their desires to consolidate the schedule

- EPA (Fraser) requested that the revised schedule incorporate the logic necessary to carry the FS report into the proposed plan and ROD Fraser also requested that a scheduling loop be included to bypass the FS if unnecessary

- DOE (Hopkins) acknowledged that the schedule is generic, based on OU-1 and OU-2 issues, but can be condensed for subsequent OUs, depending on the lessons learned on OU-specific issues None the less, DOE will revisit the schedule considering the above-stated comments.

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Other Issues were discussed during the meeting, including

- Land Use - EPA (Fraser) offered two scenarios to address the land use issue -

  a.) Assume different land uses and proceed with a matrix-type FS, or

  b.) Let EPA assume a land use as an Action

  In either case, a range of alternatives might start with unrestricted land use whereby a representative alternative would be developed, but then dismissed due to high costs The FS would then proceed with other alternatives assuming land restrictions would apply

- On-Site Contaminated Media Cell - CDH (Schieffelin) suggested that DOE consider building a centralized contaminated media disposal cell for on-site management of IDM The cell would meet the substantive requirements of RCRA. It would only be used for ER remediation and accept IDM without pretreatment CDH offered to help DOE with the concept DOE will discuss the idea in-house

- New OU-2 Milestone Dates - DOE will submit new OU-2 milestone dates to EPA when risk assessment issues are resolved DOE (Hopkins) indicated that the RI milestones need to be fixed before subsequent milestones can be developed

- Chemical-Specific ARARs. - CDH (Schieffelin) indicated that risk-based PRGs will be acceptable CDH recommended use of benchmark tables, selecting the lowest values, unless there is an obvious reason it would not be an ARAR CDH would like to participate in these discussions

- ARARs Team - As an action item, all parties agreed to designate a representative to participate in an ARARs team Such a team would proceed in parallel to the ongoing CMS/FS activities

- Items for next meeting (yet to be scheduled)

  - Review Schedule
  - Review PRG Process
  - Identify ARARs Working Group

Meeting 14th [illegible]

Name	Affiliation	Number
Tim [illegible]	ES	531-[illegible]
Eric Dille	DOE, Aguirre Eng	966-4651
Bill Fraser	EPA	294-1081
Jeff Swanson	CDH	692-3416
Dennis Schubbe	EG&G	966-8709
Dave Norbury	CDH	692 3415
Tom Greengard	SMS-RFO	966-3677
John Hopkins	EG&G	966-8636
Joe Schieffelin	CDH	692-3356
Michael Guillaume	DOE/Aguirre	966-4208

AGENDA FOR DISCUSSION OF PROGRAMMATIC
FS/CMS ISSUES - ROCKY FLATS PLANT

DATE JANUARY 21, 1994
TIME, 9 AM
LOCATION US EPA

AGENDA ITEMS

1 PROGRAMMATIC FS.

REVIEW EPA/CDH COMMENTS ON FS/CMS TASK APPROACH
REVIEW PROGRAMMATIC CMS/FS SCHEDULE/LOGIC DIAGRAM
REVIEW SCOPE AND SCHEDULE FOR MEETINGS WITH EPA AND CDH

2. OU2

REVIEW PROPOSED OU2 SCHEDULE
REVIEW SCOPE AND SCHEDULE FOR MEETINGS WITH EPA AND CDH ON OU2 SPECIFIC ITEMS
DISCUSS REVIEW OF CRITICAL DOCUMENTS THAT EFFECT THE CMS/FS SCHEDULE

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CMS/FS APPROACH

J. K. Hopkins
EE&T

CMS/FS APPROACH

TM 1 - CORRECTIVE/REMEDIAL ACTION OBJECTIVES

TM 1 (Task 5) contains the following:

- The contaminants and media of interest
- the volumes and areas of such media
- exposure pathways and receptors
- risk based PRGs
- the methodology used to develop PRGs

CMS/FS APPROACH

TM 1 (Continued)

Steps to develop TM1

- Evaluation of data sufficiency (Task 1)
- ARARs (Task 2)
- Develop RAOs, GRAs and PRGs (Task 4)

Key Decisions

- Evaluation of data sufficiency (Task 1)
- PRGs will initially be developed on the draft COC TM and updated based on the BRA
- The CMS/FS will proceed while comments are being resolved

Proposed Meetings

- Review PRG development

CMS/FS APPROACH

TM 2 - PRELIMINARY ALTERNATIVES DEVELOPMENT AND SCREENING

TM 2 (Task 9) contains the following:

- A summary of the initial screening of technologies and process options (Task 6)
- initial list of alternatives (Task 7)
- initial screening of alternatives (Task 8)
- a summary of the rationale used in the screening process
- a list of alternatives to be carried forward into the DAA
- action-specific ARARs for alternatives that remain

CMS/FS APPROACH

TM 2 (Continued)

Key Decisions:

- TM2 will proceed while comments are being resolved on TM1
- Is the range of alternatives for initial screening complete? EPA and CDH concurrence will be requested.
- Concurrence on the list of alternatives to be carried into the DAA.

Proposed Meetings:

- Review of initial list of alternatives
- Review of initial screening of alternatives

CMS/FS APPROACH

CMS/FS REPORT

CMS/FS Report (Task 11) contains the following:

- presents an orderly description of the CMS/FS development
- presents the DAA (Task 10)
- presents detailed technical work in standalone appendices
- contains an executive summary that forms the basis for the proposed remedial action plan

CMS/FS APPROACH

CMS/FS REPORT (Continued)

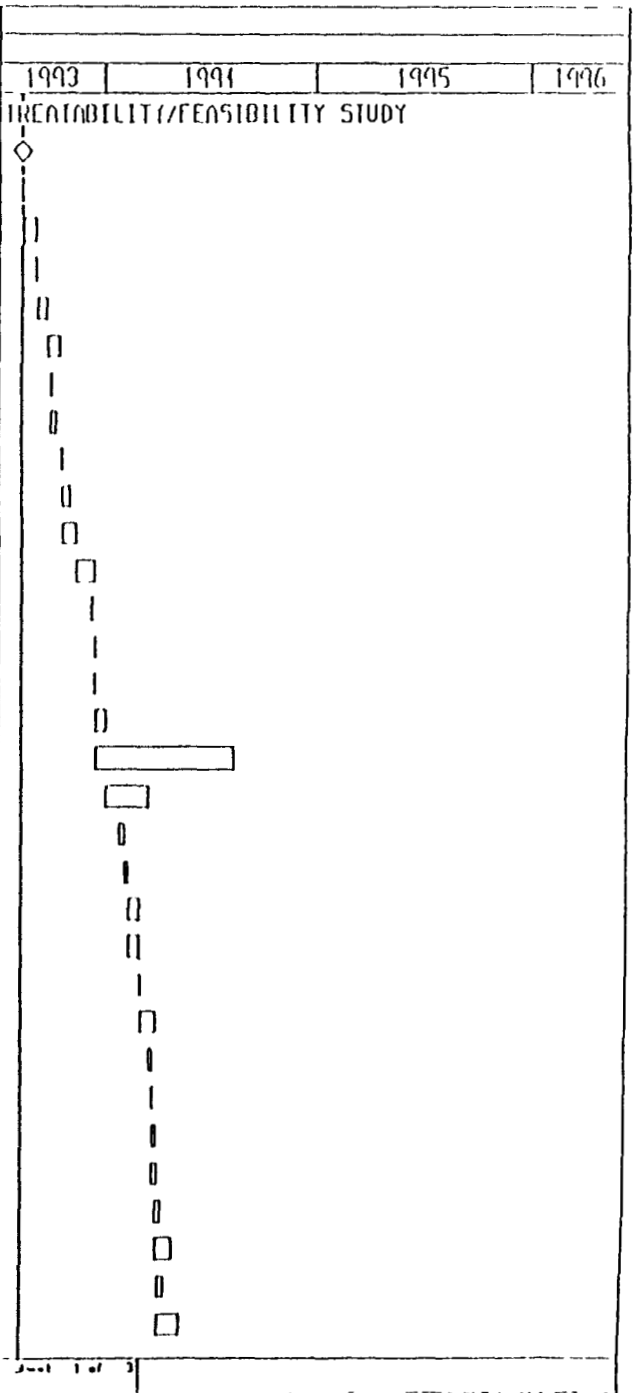
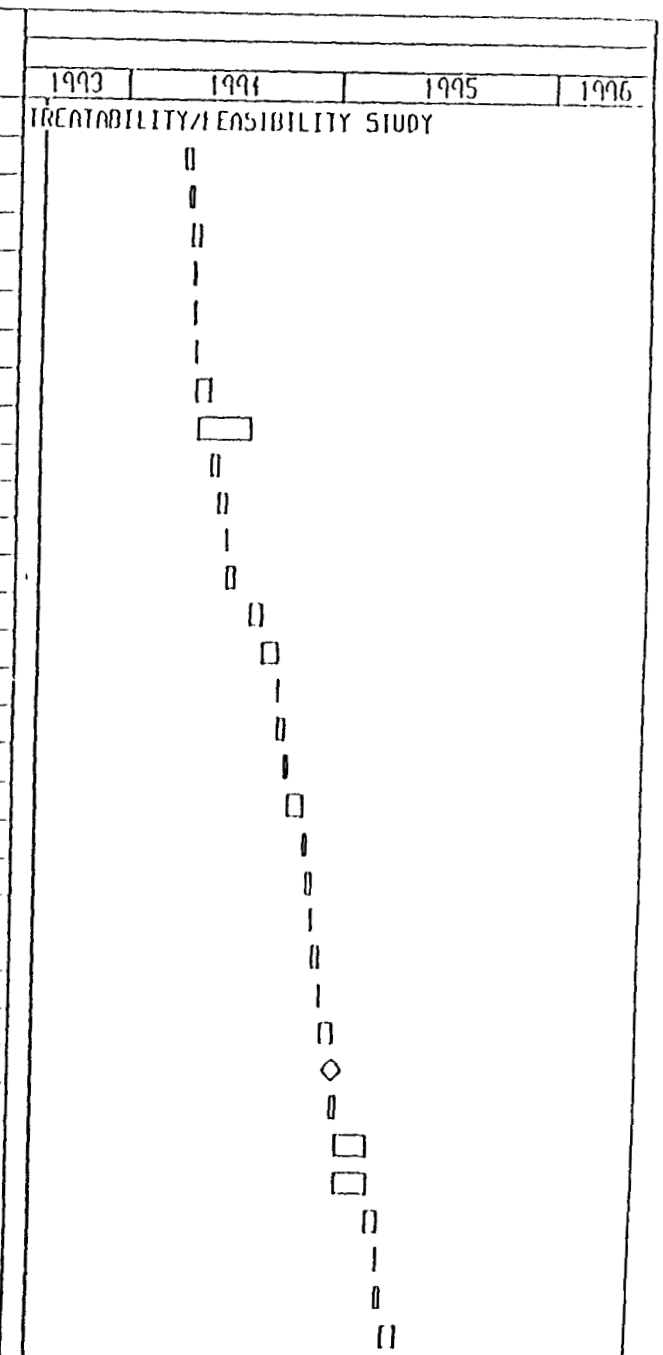
Key Decisions:

- requirements for long term monitoring
- extent of groundwater modeling required to support the DAA
- how will risk assessment support the DAA
- what is the preferred remedy

Proposed Meetings:

- Review of criteria proposed for performing the DAA
- Review of DAA and discussion of preferred remedy
- Discussion of Proposed Plan

ACTIVITY ID	ACTIVITY DESCRIPTION	ORIG DUR	EARLY START	EARLY FINISH
0002OC1000	FEASIBILITY STUDY START	0	11AUG93	
0002OC1170	SITEWIDE TREATABILITY STUDIES DATA	1	11AUG93	11AUG93
0002OC1010	PREPARE SOW	17	11AUG93	25SEP93
0002OC1020	HOLD PREBID MEETING	1	25SEP93	25SEP93
0002OC1030	PERFORM TECH EVAL	13	25SEP93	23SEP93
0002OC1040	CONDUCT CONTRACT NEGOTIATIONS	16	24SEP93	15OCT93
0002OC1180	DRAFT COC TM	1	18OCT93	18OCT93
0002OC3000	NATURE AND EXTENT - OURI	5	18OCT93	22OCT93
0002OC1050	AWARD CONTRACT	1	18OCT93	18OCT93
0002OC1060	IDENTIFY COLLECT AND DELIVER RI DATA TO SUBCONT	11	19OCT93	2NOV93
0002OC1070	SUBCONTRACTOR DEVELOPS INTERIM WORK PLAN	10	19OCT93	11NOV93
0002OC1080	CONDUCT RI DATA SUFFICIENCY REVIEW	21	12NOV93	14DEC93
0002OC1090	EG&G PROVIDES SITEWIDE BENCHMARK TABLES	1	10DEC93	10DEC93
0002OC1095	DELIVER EDS REPORT, TASK 1	1	15DEC93	15DEC93
0002OC1190	DETERMINE NEED FOR TREATABILITY STUDY	1	15DEC93	15DEC93
0002OC1100	DEVELOP COMP LIST OF TECH, TASK 3	0	16DEC93	4JAN94
0002OC2266	OU SPECIFIC TREATABILITY STUDY	160	16DEC93	9AUG94
0002OC3010	PROGRAM ARARs ACTION AND LOCATION SPECIFIC	53	3JAN94	16MAR94
0002OC1140	DEVELOP RAQs	5	27JAN94	2FEB94
0002OC1150	DEVELOP GRA	5	3FEB94	9FEB94
0002OC1155	DEVELOP PRGs	15	10FEB94	2MAR94
0002OC1230	CONDUCT INITIAL SCREENING OF TECH	15	10FEB94	2MAR94
0002OC1160	MEETING WITH EPA/CDH	1	3MAR94	3MAR94
0002OC1240	DEVELOP TASK 6 REPORT	20	3MAR94	30MAR94
0002OC1100	REVIEW AND ASSESS POTENTIAL ARAR	5	17MAR94	23MAR94
0002OC1110	EG&G/DOE MEETING TO DISCUSS POTENTIAL ARARS	1	24MAR94	24MAR94
0002OC3020	ARA FROM OU REPORT	5	24MAR94	30MAR94
0002OC1120	PREPARE TASK 2 REPORT	5	25MAR94	31MAR94
0002OC3030	REVISE PRGs	5	31MAR94	7APR94
0002OC1260	DEVELOP ALTERNATIVE LIST	20	31MAR94	28APR94
0002OC1210	DEVELOP DRAFT TM #1	10	4APR94	15APR94
0002OC2260	UPDATE OF ARARs DATA	10	4APR94	13MAR94



ACTIVITY ID	ACTIVITY DESCRIPTION	ORIG DUR	EARLY START	EARLY FINISH
00020C3040	EG&G AND DOE REVIEW REVISED PRGs	10	08APR94	21APR94
00020C1220	EG&G REVIEW AND COMMENT TM #1	5	18APR94	22APR94
00020C3050	PRG RESOLUTION	10	22APR94	5MAY94
00020C1225	INCORPORATE COMMENTS TM#1	5	25APR94	29APR94
00020C1270	DELIVER TASK 7 REPORT	1	29APR94	29APR94
00020C1275	MEETING WITH EPA/CDH	1	2MAY94	2MAY94
00020C1290	EG&G AND DOE REVIEW & COMMENT DRAFT TM#1	20	2MAY94	27MAY94
00020C1300	SCREEN ALTERNATIVES	61	6MAY94	5AUG94
00020C1300	INCORPORATE COMMENTS AND PRODUCE FINAL TM#1	10	31MAY94	13JUN94
00020C1305	EPA\CDH REVIEW OF TM#1	10	14JUN94	27JUN94
00020C1310	MEETING WITH EPA\CDH	1	28JUN94	28JUN94
00020C1320	COMMENT RESOLUTION ON TM#1	10	29JUN94	13JUL94
00020C1360	DEVELOP TASK 8 REPORT	16	8AUG94	29AUG94
00020C1390	DEVELOP TM#2	20	30AUG94	27SEP94
00020C1400	DELIVER TASK 9 DRAFT TM#2	1	28SEP94	28SEP94
00020C1403	EG&G REVIEW TM#2	8	29SEP94	10OCT94
00020C1406	INCORPORATE COMMENTS TM#2	5	11OCT94	17OCT94
00020C1410	DOE REVIEW AND COMMENT ON PRELIMINARY DRAFT TM#2	20	18OCT94	14NOV94
00020C1420	INCORPORATE DOE COMMENTS	5	15NOV94	21NOV94
00020C1440	FINAL DOE REVIEW ON DRAFT TM#2	5	22NOV94	30NOV94
00020C1460	DELIVER TM#2 TO EGG/DOE, EPA/CDH	1	1DEC94	1DEC94
00020C1462	EPA/CDH REVIEW OF TM#2	10	2DEC94	15DEC94
00020C1464	MEETING WITH EPA/CDH	1	16DEC94	16DEC94
00020C1466	COMMENT RESOLUTION	10	19DEC94	9JAN95
00020C1470	END PHASE 1 FS	0		9JAN95
00020C2160	SUMMARIZE TM NO 1, NO 2, & TREATABILITY STUDY	5	10JAN95	16JAN95
00020C2270	ANALYZE ALTERNATIVES AGAINST 9 CRITERIA	10	17JAN95	13MAR95
00020C2290	NEPA REVIEW OF ALTERNATIVES	12	17JAN95	15MAR95
00020C2272	COMPARATIVE ANALYSIS OF ALTER AGAINST 9 CRITERIA	15	14MAR95	3APR95
00020C2274	MEETING WITH EPA/CDH	1	4APR95	4APR95
00020C2276	PREPARE RECOMMENDED RAP	7	5APR95	13APR95
00020C2300	PREPARE PRELIMINARY DRAFT CMS/FS - LA REPORT	20	17APR95	12MAY95