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Department of Energy

ALBUQUERQUE OPERATIONS  
ROCKY FLATS AREA OFFICE  
P O BOX 928  
GOLDEN COLORADO 80402-0928

TIM

AUG 21 1989



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Dr. Thomas Vernon, Executive Director  
Colorado Department of Health  
4210 East 11th Avenue  
Denver, Colorado 80220

Dear Dr. Vernon:

In accordance with the Agreement in Principle signed on June 28, 1989, by governor Romer and Secretary Watkins, I am pleased to forward to you the first monthly status report which indicates the ongoing progress on the action items specified in the Agreement in Principle.

Please contact me, or your staff may contact Ms. Candice Jierree of my staff at 966-4888, if you have any questions regarding the status report.

Sincerely,

**Original Signed By**

Edward S. Goldberg  
Acting Area Manager

Enclosures

cc w/enclosures:  
T. Holman, Governor's Office  
D Shelton, CDH  
J. Scherer, EPA  
D Sanchini, Rockwell

DOCUMENT CLASSIFICATION  
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DOE/STATE OF COLORADO AGREEMENT IN PRINCIPLE

STATUS OF ROCKWELL INTERNATIONAL'S ACTIONS  
AUGUST 8, 1989

SECTION A: EXPANDED ENVIRONMENTAL MONITORING SYSTEM

ITEM	TASK DESCRIPTION	DUE DATE	STATUS	COMMENTS
A-4	Provide a full set of samples for organic chemicals and radionuclides before any discharges from on-site ponds occur. Periodic biomonitoring tests also will be performed. Samples will be split with EPA and/or CDH.	Ongoing	Ongoing	The week of July 31-August 4 samples of all final discharge ponds were collected and split with CDH.
A-5	Expedite implementation of groundwater monitoring system improvements identified by CDH and EPA. Includes installation of over 50 additional wells in the remainder of 1989.	12/31/89	On Schedule	11 wells installed to date. New well construction is on hold while a new drill rig decontamination pad is constructed. This hold should not impact the schedule negatively.
A-6	Prepare a comprehensive air emissions inventory both radioactive and toxics.	TBD	In Progress	Rockwell's Facility Engineering group submitted the promised schedule to CDH on 7/24/89.
A-7	Provide a comprehensive materials balance of VOCs for CDH review.	-	Complete	Rockwell provided the 1988 SARA Title III submission on 7/24/89 to CDH.

SECTION A: EXPANDED ENVIRONMENTAL MONITORING SYSTEM

ITEM	TASK DESCRIPTION	DUE DATE	STATUS	COMMENTS
A-8	<p>Identify all toxics and radioactive emissions coming from the facility. Provide model to predict any areas of off-site impact conduct stack testing to verify the amount and type of emissions.</p>	TBD	In Progress	<p>Rockwell's Facilities Engineering group has submitted a Basic Ordering Agreement (BOA) for identifying toxics and radioactive emissions. The Terrain-Responsive Atmospheric Code (TRAC) has been modified to treat long-term emissions of volatile organic compounds (VOCs) and hazardous substances. The Project Team is applying the model in a health effects study of carbon tetrachloride emissions from Rocky Flats. Rockwell International, the Department of Energy, and the Colorado Department of Health have formed a cooperative task team to apply TRAC and EPA models for health effects analysis and ambient air monitor network design.</p>
A-9	<p>Install continuous emission monitors in all appropriate sources to ensure continuous compliance with air pollution requirements.</p>	TBD		<p>Work has not yet started on this item since it is contingent on air emissions inventory and identification of emissions. (item A-8)</p>

SECTION B: ACCELERATED CLEANUP ACTIVITIES

ITEM	TASK DESCRIPTION	DUE DATE	STATUS	COMMENTS
B-1	<p>881 Hillside groundwater cleanup. Assess and cleanup heavy metals and radioactive constituents. Initiate groundwater cleanup and expedite investigation of sources.</p>	9/30/89	<p>Milestone delay possible.</p>	<p>Rockwell is incorporating Environmental Assessment into Interim Response Action Plan (IRAP) and addressing DOE/HQ verbal comments. Rockwell is still awaiting written comments. Meeting schedule requires receipt of written comments by 8/18/89.</p>
B-2	<p>Expedite completion of the assessment of groundwater contamination at Mound, East Trench, 903 Pad and begin construction activities.</p>	1/31/90	<p>In Progress</p>	<p>Environmental Assessment and Interim Response Action Plan are on-schedule.</p>
B-3	<p>Expedite pondcrete disposal. Remove sludge and ship pondcrete.</p>	10/31/91	<p>In Progress</p>	<p>Pondcrete is currently being shipped at 4 shipments/week. Additional resources have been requested to accelerate to 10 shipments/week. State permission to transfer water between solar ponds will be requested in order to meet the clean-out schedule. New land disposal restrictions for certain constituents (cadmium) to take effect in May 1990 may delay the schedule unless further analysis shows acceptable cadmium levels or unless an exemption/extension to the restrictions is requested by DOE and granted by EPA/CDH.</p>

SECTION B: ACCELERATED CLEANUP ACTIVITIES

ITEM	TASK DESCRIPTION	DUE DATE	STATUS	COMMENTS
B-4	Accelerate cleanup of all other identified sites.	TBD	In Progress	Schedules have been accelerated. Funding requirements determined. Five-year plan being revised.
B-5	Initiate a new review of off-site soils and lake sediments contamination.	TBD	In Progress	Rockwell is revising 5-year plan to incorporate new review requirements.

SECTION C: ACHIEVE MORE COMPREHENSIVE AND INTEGRATED ENVIRONMENTAL MANAGEMENT SYSTEM

ITEM	TASK DESCRIPTION	DUE DATE	STATUS	COMMENTS
C-1	Expeditionously provide information to the state associated with release of hazardous substances, pollutants, contaminants and radioactive materials.	Ongoing	Ongoing	A report of radioactive emission will be submitted by August 15 for DOE consideration that includes expansion of information presented in formal Monthly Environmental Monitoring Report. In addition, an interagency (DOE, CDH, and Rockwell) committee has been formed to review and make recommendation regarding the Unplanned Events Notification System.
C-4	Provide office space for state and EPA officials.	6/30/89	In Progress	One June 30, two offices were made available to the State in Building 111. By 10/1/89 a trailer will be installed south of Building 111 and west of Building 119 to house 8 state and EPA officials.
C-7	Conduct a study of all available methods to eliminate discharges to the environment, including surface waters and ground water. Include a source reduction review.	TBD	In Progress	Preliminary study on total recycle was completed 7/15/89. Funding to finalize study and to carry out study recommendations are included in the Plant Proposal for submission to DOE this month.
C-8	Conduct background characterization studies to determine base level of naturally occurring radioactive and hazardous constituents. - Water report (draft) - Soil report (draft)	11/1/89 12/30/89	On Schedule	The sampling has been completed and samples are being analyzed.

SECTION C: ACHIEVE MORE COMPREHENSIVE AND INTEGRATED ENVIRONMENTAL MANAGEMENT SYSTEM

ITEM	TASK DESCRIPTION	DUE DATE	STATUS	COMMENTS
C-9	Update and review plant's current waste characterization plan. Expand and provide more detail on the nature, quantities, and hazards associated with all hazards, mixed hazardous and radioactive and solely radioactive wastes in use on the plantsite.	Status Report 9/30/89 Draft Report 9/30/90	On Schedule	Consultants have been contracted and review and revision has been initiated. Outline for status report has been approved.
C-10	Develop plan for low-level mixed waste treatment and disposal.	11/30/89	On Schedule	Consultant has been contracted and plan outline developed and approved.
C-11	Expedite delivery and operation of the proposed super compactor. Prepare necessary permit information to expedite approval by the State of Colorado.	TBD	In Progress	The super-compactor was moved into Building 776 at the end of July. Glovebox construction is currently underway.
C-12	Provide State of Colorado with data and plans regarding the restart/operation of the Building 771. Incinerator or other major sources of incineration.	7/31/89		Incinerator not yet in use. Requirement for providing the state with data has been included in restart data.

SECTION C: ACHIEVE MORE COMPREHENSIVE AND INTEGRATED ENVIRONMENTAL MANAGEMENT SYSTEM

ITEM	TASK DESCRIPTION	DUE DATE	STATUS	COMMENTS
C-13	Make available all DOE or Rockwell documents or reviews that address safety and environmental compliance concerns.	Ongoing	On Schedule	Tentative opening data for reading room in Building 060 is 9/89.
C-14	Implement policy to give State officials with Q-clearance access records and buildings to determine environmental compliance.	7/1/89	Complete	This policy is in effect for Q-cleared State officials. Safety training is required for Production Buildings.
C-15	Clarify and provide a written explanation to the Governor's Office and CDH of the current "need to know" security information policy that precludes state and local access to certain types of information.	6/29/89	Complete	Presentation was made to the Governor by DOE/RFO. A written explanation is being transmitted.
C-16	Meet all state and EPA cleanup and closure plan milestones and deadlines.	Ongoing	Ongoing	Milestones are being negotiated for a new inter-agency agreement (IAG).



SECTION C · OTHER DOE ACTIONS

ITEM	TASK DESCRIPTION	DUE DATE	STATUS
C-2	EXPAND REGULATORY ROLE	JULY 1	NEW ORGANIZATION APPROVED BY DOE-HQ WHICH CHANGE THE AREA OFFICE TO A FIELD OFFICE AND PERMITTED INCREASED DOE STAFFING TO 171 POSITIONS
C-5	ENVIRONMENTAL AUDIT	SEPTEMBER 1	COMPLETED BY JULY 26, 1989 WITH DRAFT REPORT FINAL REPORT DUE SEPTEMBER 1
C-6	WASTE MINIMIZATION AUDIT	DECEMBER	MAJOR PLANT EFFORT ONGOING PLANT EFFORT NO AUDIT SCHEDULED, BUT PROGRESS REPORT IS ATTACHED
C-11	SUPERCOMPACTOR		STATUS REPORT ATTACHED
C-17	EMISSION DATA	MONTHLY	SCHEDULE PROVIDED TO CDH

FOR APEN SUBMITTALS FOR  
ENTIRE PLANTSITE

C-18 CLEANUP MILESTONES

ALL ENVIRONMENTAL  
RESTORATION MILESTONES  
ARE BEING INCORPORATED  
INTO THE FFCA CURRENTLY  
BEING NEGOTIATED WITH  
CDH AND EPA