

License Termination at a Superfund Site A Joint Partnership

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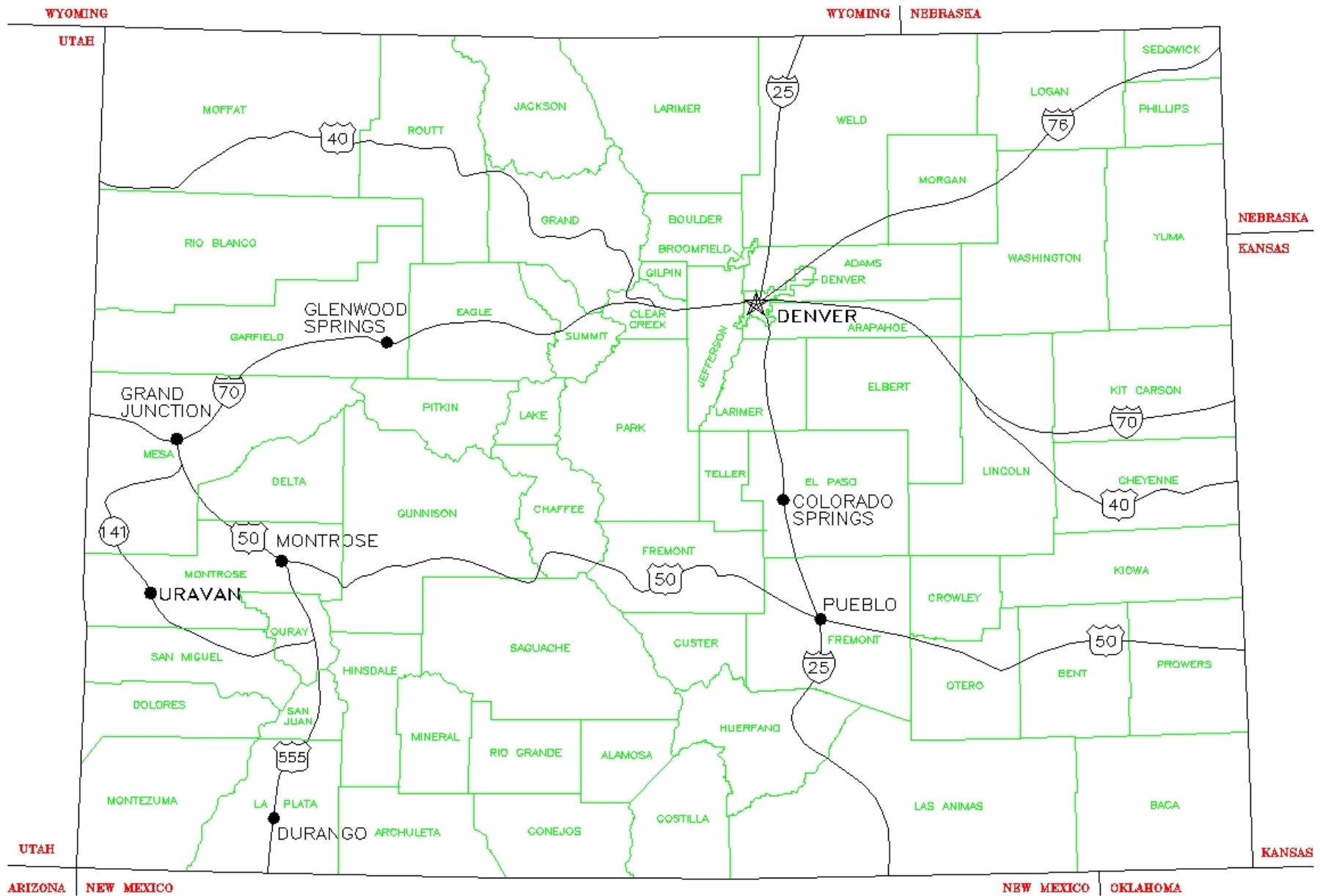
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Partnership Advantages

- Increase effective communication between industry and governmental agencies
- Understand agency processes and agency needs
- Determine the involvement and interrelationship of various agencies
- Identify possible road blocks for delisting of the site and termination of the radioactive materials license
- Meet community needs by interaction with community leaders

Location Map



Uravan Superfund Site



History

- 1914 Radium Production
- 1929 Vanadium Production
- 1940-1945 Uranium Production for Manhattan Project
- 1948-1984 Uranium Production for AEC's Weapons Program and Power Plants : 10.5 MM tons
- 1983 State of Colorado filed suit against Union Carbide for Natural Resource Damages
- 1987 Remedial Action Plan Implemented
 - Negotiated Settlement Reached
 - Remedial Construction Began

Project Scope

- Evaluation of over 1600 acres of potentially affected land.
- Removal and disposal of 3,000,000 cubic yards of radioactive waste from over 400 acres.
- Collection and evaporation of over 250,000,000 gallons of contaminated seepage and groundwater.
- Construction of 4 repositories designed to isolate over 13,000,000 cubic yards of radioactive waste for 1,000 years.
- Total reclamation cost: \$120,000,000

Delisting and License Termination Process

- Form Site Closure Committee
 - Identify Participating Regulatory Agencies
 - Prepare Committee Charter
- Prepare Process Flow Chart
 - Determine Regulatory Needs
 - Assess Project Activities
 - Define and Establish Regulatory Interrelationships
 - Determine Key Site Closure Activities
- Develop Committee Work Activities and Set Action Items

Uravan Site Closure Committee

- Partners: Umetco, EPA, BLM, DOE, CDPHE, Judge Dana (Special Master) and Leo Large (County Commissioner). NRC is an ad hoc participant.

- Charter:

The Committee exists to close the Uravan site in a timely and efficient manner consistent with the Uravan Consent Decree and applicable regulations by:

- *Clearly understanding each organization's internal processes and needs for Uravan deletion, license termination, and land transfer.*
- *Minimizing delays to deletion, termination, and land transfer process by identifying agency requirements for the Uravan site.*
- *Providing a vehicle for ongoing discussions and clarification throughout the deletion, termination, and land transfer process.*

URAVAN SITE CLOSURE, LICENSE TERMINATION AND DE-LISTING PROCESS									
DOW/UMETCO	DOW LEGAL								
	DOW M&A								
	UMETCO	<div>Umetco decides to begin certification report</div> <div>Compile eval, final construction w/as built, & compliance reports as available</div> <div>Prepare Draft Certification Report</div> <div>Send Certification Report to Dow Legal</div>							
		<div>Umetco decides to start LTSP prep.</div> <div>Umetco drafts LTSP</div> <div>Umetco drafts PCOR</div> <div>Umetco drafts CRP#6</div> <div>Dewater CRP#6</div> <div>Remove liner from pond and pilot remediation</div> <div>Sample around CRP#6</div> <div>Determine remedy at CRP#6 submit by 6/2004</div> <div>Set budget Sept 2004</div> <div>Perform risk assessment on Y-11</div> <div>Determine disposition on Y-11</div> <div>Remove plant A north material</div> <div>Conduct remediation in 2005</div>							
USC	Uravan Site Closure Committee								
STATE OF COLORADO	Colorado Dept of Public Health & Environment (CDPHE)								
	GOVERNOR'S OFFICE Attorney General EXEC DIR CDPHE								
EPA	EPA REGIONAL								
	EPA REGIONAL HQ								
	EPA HQ								
Federal Government	PUBLIC								
	FEDERAL COURT								
	Dept. Of Energy (DOE)								
	Bureau of Land Mgmt (BLM)								
	ARMY Corps Of Engrs (COE)								
	Regulator Commission (NRC)								
		<div>LTSP: Long Term Surveillance Plan</div> <div>PCOR: Preliminary Close-out Report</div> <div>FCOR: Final Close-out Report</div> <div>NOID: Notice of Intent to Delete</div> <div>CRR: Completion Review Report</div> <div>RAP: Remedial Action Plan</div> <div>CRP: Club Ranch Pond(s)</div>	<div>Blue: Remedial Investigation</div> <div>Red: License Termination Process</div> <div>Green: De-listing Process</div> <div>Orange: Land Transfer Process</div> <div>Black: Report Creation</div>						
Notes:	<div>1. Umetco must formally notify DOE of intent to transfer site 2 yrs before anticipated transfer date</div> <div>2. Umetco provides documentation to support development of LTSP no later than one year before anticipated site transfer date</div>								

1. Umetco must formally notify DOE of intent to transfer site 2 yrs before anticipated transfer date		
2. Umetco provides documentation to support development of LTSP no later than one year before anticipated site transfer date		

Key Committee Activities

- Established communications between all stakeholders
- Assess de-listing process and license termination time frame
- Review and approve site closure process
- Streamline closure process by identifying key issues
- Approve site closure documents

N&B Committee Activities

- Quarterly Meetings
- Round Table Discussions
- Presentations on Specific Issues (e.g. Alternate Soil Standards)
- NRC Advisement on Specific Topics
- Action Items – Committee Homework

Future Site Closure Activities

- Complete Remedial Actions
- Umetco Certification Report
 - Key to timely delisting and license termination
 - Objective : To have all necessary technical and legal information in one report so that final CDPHE, EPA, DOE and NRC documents can be efficiently prepared from the same data base.
 - Certification Report will incorporate three guidance documents: PCOR, LTSP and CRR
- Preliminary Close-Out and Completion Review Report
 - Prepared by CDPHE
 - Reviewed by EPA and NRC
- Resolve Land Transfer Areas (BLM, DOE, County)

Schedule of Closure Activities

- 2007 Complete Construction
- 2007 Submit Closure Documents to CDPHE, EPA, NRC, DOE, and BLM
- 2008 CDPHE Prepares PCOR and CRR
- 2008 EPA Deletes Site from NPL
- 2008 NRC Terminates License
- 2008 Site Transferred to DOE

What makes it work ?

- Committee members interested in the outcome of the project
- Well defined goals/objectives
- Frank and open discussions (No meeting minutes)
- Action Items drive the process

Mill Cleanup



After



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