

# ROCKY FLATS SITE REGULATORY CONTACT RECORD

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**Purpose:** Minor Modification of *Rocky Flats Legacy Management Agreement (RFLMA)* Attachment 2, “Legacy Management Requirements.”

**Contact Record Approval Date:** January 30, 2014

**Site Contact(s)/Affiliation(s):** Scott Surovchak, U.S. Department of Energy (DOE); Linda Kaiser, S.M. Stoller Corporation (Stoller); Rick DiSalvo, Stoller; David Ward, Stoller

**Regulatory Contact(s)/Affiliation(s):** Carl Spreng, Colorado Department of Public Health and Environment (CDPHE); Vera Moritz, U.S. Environmental Protection Agency (EPA)

**Date of Consultation Meeting:** January 16, 2014

**Consultation Meeting Participants:** Carl Spreng, CDPHE; Vera Moritz, EPA; Scott Surovchak, DOE; Linda Kaiser, Stoller; Rick DiSalvo, Stoller

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**Introduction:** In accordance with RFLMA Attachment 2, Section 5.1, “Monitoring Surface Water,” DOE certified to CDPHE and EPA that as of September 29, 2013 WOMPOC on Woman Creek and as of September 28, 2013 WALPOC on Walnut Creek had been functioning as Points of Compliance (POCs) for 2 years. Therefore, surface water monitoring locations GS01 on Woman Creek and GS03 on Walnut Creek ceased being RFLMA POCs. The only Woman Creek POC is now WOMPOC, and the only Walnut Creek POC is now WALPOC, both inside the Central Operable Unit (COU).

For background information on the changes to the POC locations, see Contact Record 2010-04, “[RFLMA] Attachment 2: Modification to Revise Monitoring Points” and Contact Record 2012-03 “Minor Modification of [RFLMA] Attachment 1, ‘Site Map,’” and RFLMA Attachment 2, “Legacy Management Requirements.”

The RFLMA parties agree that RFLMA Attachment 2 should be modified to remove GS01 and GS03 from text, tables, and figures for clarity and simplicity.

Pursuant to RFLMA paragraph 66, DOE and CDPHE do not consider these items to constitute a significant change from existing requirements of RFLMA, and this contact record provides public notice of the proposed minor modifications. DOE will submit the modifications to CDPHE and EPA for review and approval pursuant to RFLMA paragraph 65.

The specific minor modifications are described in more detail below.

**Discussion:** RFLMA Attachment 2 text to be deleted is shown in single-line strikethrough, and new text is in bold. Modifications to tables and figures are summarized.

1. Section 5.1, “Monitoring Surface Water”

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- Points of Compliance (POCs): Located in Woman and Walnut Creeks at the downstream Central OU boundary. These locations are used to demonstrate compliance with the surface-water standards in Table 1 and are labeled WOMPOC and WALPOC respectively. ~~WALPOC, which replaced former POCs GS08 and GS11 on September 28, 2011, and WOMPOC, which replaced former POC GS31 on September 9, 2011, will also replace GS03 and GS01 respectively upon DOE notification to EPA and CDPHE certifying that WALPOC and WOMPOC have been functioning as POCs for at least 2 years. EPA or CDPHE may extend the 2-year period by requiring DOE to submit a modification to this attachment in accordance with RFLMA paragraph 65 if either determines that such modification is necessary to ensure protection of human health and the environment.~~

2. In Table 2, “Water Monitoring Locations and Sampling Criteria,” the rows for locations GS01 and GS03 will be deleted.

3. Table 2, footnote 5

~~Results for POCs are evaluated using Figure 5. POCs GS01 and GS03 will be replaced by WALPOC and WOMPOC per Section 5.1.~~

4. In Figure 1, “Water Monitoring at Rocky Flats: RFLMA,” locations GS01 and GS03 will be deleted.

5. Figure 1 notes

~~*WALPOC and WOMPOC will replace POC locations GS01 and GS03 as described in Section 5.1*~~

6. Figure 5, “Points of Compliance”, footnote 1

Calculated values for determining Reportable Condition and exceedances of remedy performance standards at POCs.

- Reportable conditions (according to Section 6.0):
  - plutonium, americium, uranium, nitrate** → 30-day average<sup>2</sup>
- Reportable Conditions and evaluation of compliance with remedy performance standards in Table 1:
  - plutonium, americium, uranium, nitrate** → 12-month rolling average<sup>3</sup> for POCs inside COU; 30-day average for GS01 and GS03.

**Closeout of Contact Record:** This contact record will be closed when the minor modifications to RFLMA Attachment 2 are approved.

**Resolution:** Carl Spreng, CDPHE, approved this contact record.

**Contact Record Prepared by:** Rick DiSalvo and David Ward

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**Distribution:**

Carl Spreng, CDPHE

Scott Surovchak, DOE

Linda Kaiser, Stoller

Rocky Flats Contact Record File