

Appendix E

Rocky Flats, Colorado, Site Erosion Control Monitoring and Maintenance Inspection Procedure

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LMS/RFS/S04532

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April 2012

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1.0 Introduction

The *Erosion Control Plan for Rocky Flats Property Central Operable Unit* (DOE 2007) addresses the best management practices (BMPs) to adequately control storm water runoff of soils that could ultimately discharge into surface water. Under the Erosion Control Plan, inspections of the implemented BMP erosion control measures must be conducted on a regular basis. The Erosion Control Monitoring and Maintenance Procedure outlines the procedures used for inspections, documentation, and maintenance of the current BMPs.

The BMPs typically used at the Rocky Flats Site include erosion bales, erosion logs, Geotextile sediment control berms, erosion control blankets, turf reinforcement mats, tackifiers, and mulching. These BMPs are installed according to manufacturers' recommendations, and they require maintenance. Inspections are conducted regularly to keep the BMPs in effective operating conditions at all times.

2.0 Erosion Control Coordinator

The Rocky Flats site manager shall designate a staff member as the Rocky Flats erosion controls coordinator (ECC) responsible for carrying out the Erosion Control Plan. The site manager shall ensure that the ECC has an appropriate level of knowledge, skills, and abilities through work experience, formal or on-the-job training, and education to properly perform the ECC duties in relation to the Erosion Control Plan requirements. The site manager, in consultation with the ECC, shall identify additional training the ECC may need and the reasonable time for completion of the training. The ECC shall provide on-the-job training for field personnel as necessary to assist in implementing the Erosion Control Plan and the maintenance and inspection activities in this procedure.

The ECC is responsible for maintaining maps or having access to construction drawings for each active construction project that includes erosion control BMPs, for each location where current erosion control BMPs must be inspected. Final erosion control BMPs for any completed construction project will be added to the maps maintained by the ECC.

The maps are maintained in the site Geographical Information System (GIS), and the construction project lead maintains the construction drawings for active construction projects. The GIS will be updated to reflect new BMP installations and to reflect removals that result when success criteria have been met (according to the Erosion Control Plan).

3.0 Inspections

Currently two types of erosion control inspections are conducted at the Rocky Flats Site: the Preble's meadow jumping mouse (PMJM) erosion control survey and the erosion control survey for the Central Operable Unit. Erosion controls are inspected for placement, need for maintenance, potential need for additional measures, and effectiveness. The erosion control BMP maps or construction drawings will be used as a guide for the inspections.

Inspections are conducted by the ECC or a worker who has been trained in erosion and sediment controls and is designated by the ECC or the site manager to conduct inspections. A subcontractor worker involved in a construction project may be designated to conduct required inspections for the construction project. The inspector is responsible for visiting each location identified in the inspection forms and on the maps. The visits are documented in the Erosion Control Observation Log. Documentation includes the location, date, inspector's name, and any comments about the erosion controls in that location.

The PMJM erosion control surveys are required by the Programmatic Biological Assessment for the site. The PMJM inspections are conducted weekly at various mitigation locations around the site. This inspection is a spot inspection that evaluates BMPs in sensitive PMJM habitat to ensure that no sedimentation or erosion problems are damaging the habitat. Surveys are documented in the Erosion Control Observation Log.

The erosion control survey for the Central Operable Unit is conducted monthly at locations throughout the Central Operable Unit; the survey locations are identified on the maps maintained by the ECC. This inspection is performed monthly, or after a significant weather event that could damage the controls, or daily for controls related to active construction work. These inspections should be recorded on the Site Inspection Log.

Each area with erosion controls to be inspected will be traversed to visually inspect the conditions of the erosion controls that are implemented. In particular, the inspector should focus on locations with steep slopes, poor drainage, or bare soils and on locations near the roads. The evaluation looks at:

- Placement of BMPs—are they appropriately located?
- Installation of BMPs—were they installed correctly?
- Effectiveness of BMPs—are they providing effective control?
- Corrective action—does anything need repair, maintenance, or replacement?
- Documentation—record evaluation results on the survey forms and maps.

4.0 Maintenance

Maintenance should be performed as soon as site conditions allow. Maintenance needs that are not corrected within 24 hours should be recorded in the Site Observation Log to ensure proper follow-up and closeout. Maintenance will vary for specific site locations and conditions. The maintenance for each erosion control implemented will follow the manufacturers' recommendations (as feasible), and the Routine Ecological Work JSA (RFS002129). The Colorado Department of Transportation *Erosion Control and Stormwater Quality Guide* (CDOT 2002) is a useful guide to installation and maintenance tips.

5.0 References

DOE (U.S. Department of Energy), 2007. *Erosion Control Plan for Rocky Flats Property Central Operable Unit*, DOE-LM/1497-2007, Office of Legacy Management, Rocky Flats Environmental Technology Site, July.

CDOT (Colorado Department of Transportation), 2002. *Erosion Control and Stormwater Quality Field Guide*, Denver, Colorado.

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