

**ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE
REGULATORY CONTACT RECORD**

Date/Time: 2-14-01/ 11 am
Site Contact(s): Annette Primrose
Phone: 4385
Regulatory Contact: Carl Spreng
Phone: (303) 692-3358
Agency: CDPHE

Purpose of Contact: Discussion of e-mail comments received on February 9, 2001 from Denise Onyskiw concerning Carl's additional comments on the environmental remediation portion of the B771 DOP.

Discussion

I called Carl and discussed the additional comments provided by Denise Onyskiw (CDPHE) to Jeff Stevens (KH). Following are the comments provided by Denise and discussed with Carl with the agreed upon responses.

Comment #22:

The redlined version has not added text to this paragraph that specifically that sampling location and frequency will be guided by the IASAP.

Response: The following sentence was added to the 4th paragraph in section 4.5.4.3 "The survey and sample location and frequency will be based on the guidance provided in the IASAP."

Table 5 has been expanded with an appropriate list of potential COCs.

"Neptunium" has been misspelled.

Response: Neptunium was deleted along with titanium, cerium, tantalum and cyclohexane after discussions with the group writing the IASAP and B771 addendum. Instead, text was added to clarify that there may be other constituents present associated with process line leaks, but that remediation of the contaminants listed in Table 5 is also expected to remediate other contaminants present.

Comment #23:

Evidence of contamination above Tier 2 values also triggers an evaluation to determine if those levels will impact surface water or ecological resources. This new text ignores this provision of ALF.

Response: The following sentence was added to 4.5.4.1 Proposed Action Objectives: Soils above Tier 2 action levels will be evaluated and may be removed if it is determined that there is a potential impact to human health and/or surface water.



DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

Contact Record 4/10/00
Rev. 7/13/00

ADMIN RECORD

Follow-on Actions

A redlined version of the DOP was sent to Carl on February 14th. On February 15th, Carl confirmed that these responses were adequate.

Contact Record Prepared By: Annette Primrose

Required Distribution:

L. Butler

N. Castaneda

D. Foss

S. Lopez

S. Nesta

L. Norland

J. Stevens

S. Surovchak

Meeting Minutes Book

Primrose, Annette

From: Primrose, Annette
Sent: Wednesday, February 14, 2001 12:04 PM
To: 'CDPHE - Carl Spreng'
Cc: Butler, Lane; Norland, Lee; Foss, Dyan; Stevens, Jeffrey; Castaneda, Norma
Subject: RE: Additional Comments from Carl

See responses below.

---Original Message---

From: Stevens, Jeffrey
Sent: Monday, February 12, 2001 11:32 AM
To: Butler, Lane
Subject: FW: Additional Comments from Carl

FYI

---Original Message---

From: Denise Onyskiw [SMTP:Donyskiw@smtpgate.dphe.state.co.us] <mailto:Donyskiw@smtpgate.dphe.state.co.us>
Sent: Friday, February 09, 2001 12:10 PM
To: jeffrey.stevens@rfets.gov
Cc: joe_springer@rf.doe.gov; dyan.foss@rfets.gov; Carl Spreng; STEVE Gunderson; Steve Tarlton
Subject: Additional Comments from Carl

Jeff,

I got some additional comments from Carl that might clarify some things:

Comment #15: Carl said that the additional clarifying text was added and the response and further clarification response resolution discussions are adequate.

Comment #22:

The redlined version has not added text to this paragraph that specifically that sampling location and frequency will be quided by the IASAP.

Response: The following sentence was added to the 4th paragraph in section 4.5.4.3 "The survey and sample location and frequency will be based on the guidance provided in the IASAP."

Table 5 has been expanded with an appropriate list of potential COCs.

"Neptunium" has been misspelled.

Response: Neptunium was deleted. Text was added to clarify that there may be other constituents present associated with process line leaks, but that remediation of the contaminants listed in Table 5 is also expected to remediate other contaminants present.

Comment #23:

Evidence of contamination above Tier 2 values also triggers an evaluation to determine if those levels will impact surface water or ecological resources. This new text ignores this provision of ALF.

Response: The following sentence was added to 4.5.4.1 Proposed Action Objectives: Soils above Tier 2 action levels will be evaluated and may be removed if it is determined that there is a potential impact to human health and/or surface water.

I'll be in the office today till about 3:30.

Denise

Primrose, Annette

From: Primrose, Annette
Sent: Wednesday, February 14, 2001 12:33 PM
To: 'CDPHE - Carl Spreng'
Cc: Butler, Lane; Norland, Lee; Castaneda, Norma; Foss, Dyan; Stevens, Jeffrey
Subject: Revised B771 DOP

Attached is the redlined version of the B771 DOP with the latest revisions. These are located in the document as follows:

- Sampling frequency and location was added to Section 4.5.4.3 4th paragraph (bottom of page 34)
- As we discussed, Table 5 was revised and Neptunium was deleted (page 33). Additional clarifying text was added to the 3rd paragraph of section 4.5.3 3rd paragraph (page 32)
- New text on the action triggered by Tier 2 soils was added to 4.5.4.1 (page 34)
- The text discussed Monday concerning the remedial action chosen can be found in the last paragraph in Section 4.5 (page 31)



771DOP(redFinal)
(2).doc

Please call if you have questions.

Annette Primrose (303) 966-4385

Primrose, Annette

From: Primrose, Annette
Sent: Wednesday, February 14, 2001 9:44 AM
To: 'CDPHE - Carl Spreng'
Cc: Butler, Lane; Norland, Lee; Castaneda, Norma
Subject: RE: Revised 771 DOP

Carl, we intend to remediate the contaminant sources above Tier 1 action levels that are associated with the UBC. We will not chase associated contaminant plumes unless there is expected to be an impact to surface water or human health. In those cases, the plume will be intercepted. Annette

—Original Message—

From: Carl Spreng [SMTP:cspreng@smtgate.dphe.state.co.us]
Sent: Monday, February 12, 2001 7:56 AM
To: Annette.Primrose@rfets.gov; carl.spreng@state.co.us
Cc: Lane.Butler@rfets.gov; Lee.Norland@rfets.gov
Subject: Re: Revised 771 DOP

These sentences look good to me. Will this be the pattern for UBC remedial actions - to chase environmental contamination originating from a building as far as it goes (or at least till it hits groundwater)?

Thanks,
Carl

Primrose, Annette

From: Spence, Tracey
Sent: Friday, February 09, 2001 5:50 PM
To: 'Carl.Spreng@state.co.us'
Cc: Primrose, Annette; Norland, Lee
Subject: IASAP Addendum 1

Importance: High

Carl,

Based upon further review of the target analyte list presented in the *Draft Addendum 1 to the IASAP - Building 771 UBC*, we are considering removing three analytes from the list: cyclohexane, tantalum, and cerium. These analytes are listed as process constituents associated with the Process Waste Lines beneath Building 771 (Historical Release Report [DOE 1994]).

In addition to cyclohexane, tantalum, and cerium, the target analyte list for the preliminary characterization sampling includes the primary actinides, metals, and VOCs, which are also associated with the 771 Process Waste Lines. As described in the *Draft Addendum 1 to the IASAP - Building 771 UBC*, the objective of the preliminary characterization sampling for Building 771 is to identify potential contamination beneath the structural support of the building to support the Building 771/774 Closure Project demolition strategy. Follow-on sampling will be conducted to further characterize and delineate the extent of Building 771/774 UBC at the time of building remediation in accordance with the IASAP. If a release from the Process Waste Lines occurred, then detections of these compounds would act as indicators for the likely presence of tantalum, cerium, and cyclohexane and would provide adequate data to meet the objective of the preliminary sampling for Building 771.

Considering the total number of samples proposed for the preliminary characterization, removing cyclohexane, tantalum, and cerium from the target analyte list will reduce the project laboratory and sample shipment costs by \$19,000 to \$20,000.

Please contact me or Lee Norland (303-966-5223) if you have any questions.

Tracey Spence
Environmental Restoration, B116
303-966-4322
Pager: 212-6575
Fax: 303-966-5180

Primrose, Annette

From: Carl Spreng [cspreng@smtggate.dphe.state.co.us]
Sent: Friday, February 09, 2001 11:18 AM
To: Annette.Primrose@rfets.gov
Subject: Re: Redlined version of the B771 DOP

Annette:

I just talked to Lee, who said you were in training this morning. He'll be asking you to send me the additional/clarifying text referred to in the response to comments on the PAM portion of the 771 DOP, but that is unnecessary since by sending me the redlined version, you have already done just that.

In addition to the sentence you added to the third paragraph of Section 4.5.1, how about sentence at the end of the previous paragraph to add flexibility to the remedy selection, since the alternatives analysis is not very rigorous:

"If a remedial action other than source removal is developed, it will be proposed to the LRA as a modification to this DOP."

A modification approved by the LRA is always an option, of course, even if it not specifically stated here.

Thanks,
Carl

7/7