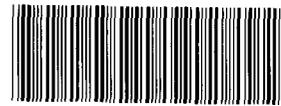


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# MEMORANDUM

DATE: November 2, 1995 5400.1

TO: L. E. Woods, Ecology, Bldg. T130C, X3378

FROM: *M.B. Murdock*  
M. B. Murdock, Ecology, Bldg. T130B, X3560

SUBJECT: NEED OF CONTINGENCY PLANNING FOR REVEGETATION FAILURES AT  
ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE - MBM -107 - 95

It is apparent to Ecology/RMRS that no revegetation contingency plan exists at Rocky Flats Environmental Technology Site (Site). This is an oversight that requires correction if the Site is to remain in compliance with federal, state, and local statutes, as well as Department of Energy (DOE) orders. Several recent projects have outstanding revegetation work that cannot be performed due to budget overruns. The projects are out of funds, and because revegetation is normally the last step of a construction project, it is often omitted. Recent examples of this problem include the Seismic Evaluation Project trench, the temporary road constructed in Operable Unit 5 (OU5), and the North Live Fire Range (Range) Upgrade Project. During design and development of these projects, project personnel were made aware of revegetation requirements, and wrote revegetation plans that were incorporated into their work plans. These projects have notified Ecology of their intent to default on these commitments. Additionally, initial revegetation efforts on the French Drain area of the 881 Hillside proved unsuccessful, and there is currently a growing noxious weed infestation in that location that requires immediate control. There is no existing reseeding contingency plan to solve this problem. The lack of revegetation is a compliance issue for the Site because of the several statutes and DOE orders described below.

Weed control on Federal lands is mandated by the Federal Noxious Weed Act, P. L. 93-629, Section 15; the Colorado Weed Management Act, Section 1, Title 35, CRS, 1984, Article 5.5; and the Jefferson County Undesirable Plant Management Plan. Penalties for violations vary, (e.g. the state and county acts indicate that Jefferson County can enter federal property to treat noxious weeds, then can bill the federal agency who owns the land for reasonable expenses). The lack of revegetation efforts in disturbed areas at the Site allows the more aggressive noxious weed species to pioneer and establish before the less aggressive, desirable native plant species can revegetate the disturbed areas through succession. Many of the noxious weed species, which are already a burgeoning problem here at the Site, form thick colonies that native species cannot penetrate or compete with. The lack of revegetation on the OU5 road and the Range berm, has allowed diffuse knapweed, one of the Site's target noxious weeds, to become established in these areas. Rocky Flats has already spent a considerable sum in attempting to control this weed. The longer there are available seedbeds for this and other problem weeds, the greater the infestation will become, and the greater the control costs will be.

The Range poses an additional problem, which is likely to have similar counterparts in other work areas at the Site, in that lead may be present in the unstabilized berm slope. Due to the lack of

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vegetation, or other means of stabilization, erosion of the berm has already started to occur. Without soil surface stabilization, the berm will continue to erode, increasing the risk that lead may migrate from the location. There were concerns that the material removed from the inside of the Range might contain lead from bullets. It was for this reason that the overburden was deposited on the north side of the berm rather than in the landfill. The reasoning was that if there was a lead hazard, it would be contained at a single location. A good vegetative cover will help limit the possibility that lead may migrate from the location. Eroded soils that reach waterways on the Site can create violations of the Site's discharge permits, and violate the Clean Water Act, 33 USC 1251-1387.

The DOE Order 6430.1A requires site development to consider a number of criteria, including revegetation and erosion control. Additionally, the Order states "The area beyond the construction limits shall not be unnecessarily disturbed." Further, it mandates "Drainage and erosion control measures." The Order goes on to require that "Disturbance of the natural terrain shall be minimized during site grading. Where feasible, natural flora on or adjacent to the construction site shall be preserved and protected from vehicular and pedestrian traffic with temporary fencing", and "In locations where topsoil is not readily available, all topsoil within the area of disturbance shall be scalped and stockpiled in a designated location, for later use in landscaping and revegetation efforts." The Order also states that "Natural flora in unlandscaped areas shall be reestablished where disturbed by construction activities." Pollution and soil erosion controls are also mandated by this Order.

The Watershed Management Plan for Rocky Flats Plant (April 1993), which addresses the requirement for revegetation after construction, was developed in response to DOE Order 6430.1A and DOE, RFFO requests to establish such a program. The required scope included a program to address weed control, animal control, erosion control, and dust control. The resulting Plan includes programs for weed control, vegetation stabilization, and erosion control, as well as others. The Vegetation Stabilization Program (VSP) comprises an important component of the weed control and erosion control programs. *Establishment of a continuous, viable cover of desirable vegetation hampers invasion of noxious weeds. Establishment of an effective, self-sustaining vegetative ground cover is also one of the most efficient deterrents to erosion.* The VSP program plan requires that "The VSP shall be utilized for any project .... affecting any watershed at RFP such as : .... construction or maintenance activities which cause ground disturbance." Under Section 5.4 Vegetation Stabilization Guidelines the VSP states "Activities on the plant site that destroy existing plant cover or otherwise expose bare soil shall be vegetated as quickly as possible."

It is clear that under DOE policies, under weed control statutes, and under Rocky Flats program plans, revegetation of disturbed areas at the Site is required. In addition to keeping projects accountable for revegetation of areas disturbed through construction activities, the Site needs to establish a contingency program to address failed revegetation from closed out projects. From a planning and management standpoint, it is not efficient to require a project to retain an open Integrated Work Control Plan (IWCP) in case revegetation fails. Revegetation is a slow process at best, and adequate success cannot be fully measured for a number of years. The established Project Management process at the Site cannot allow for indefinitely open IWCPs. This is an issue that needs resolution while the projects and problems are still small. Once the Site starts large-scale remediation, the problem may grow precipitously to unmanageable proportions.

L. E. Woods  
November 2, 1995  
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Should you have comments or require further information, please call me at extension 3560.

MBM:mbm

cc:  
C. S. Evans  
J. D. Krause  
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