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Rocky Flats Environmental Technology Site : 464 Colorado 80402-0464 (303) 966-7000

Originator Ltr Log #

MRW-009-97

97 - RF -

July 8, 1997

Steve Nesta Kaiser-Hill Environmental Compliance Rocky Flats Environmental Technology Site P. O. Box 464, T130C Golden, CO 80402-0464

REQUEST OF SUPPORT FOR NEPA CHECKLIST AND THREATENED, ENDANGERED, AND MIGRATORY BIRD SURVEY FOR THE PRE-REMEDIAL INVESTIGATION OF IHSSs 170, 174a, AND 174b, PROPERTY UTILIZATION & STORAGE - MRW-009-97

This letter requests your support for the Pre-Remedial Investigation of IHSSs 170, 174a, and 174b, Property Utilization & Storage Yard. Specifically, RMRS needs a threatened, endangered, and migratory bird survey performed prior to field work and review of our NEPA checklist (see attachment). Field activities are scheduled to begin on or around July 28 to August 4, 1997. Please respond to this letter by July 10, 1997. If you have any questions or need to contact me, please call me at extension 6689. Thank you for your support of the RMRS ER Projects.

Mark R. Wood

Mark R. Wood Project Manager

MRW/aw

Attachments: As Stated

Table with columns: DIST., LTR, ENC. Rows include names like BARTHEL, J.M., BENDEL, P.R., BENSON, C.A., etc.

Table with columns: CLASSIFICATION: UCN, UNCLASSIFIED, CONFIDENTIAL, SECRET

AUTHORIZED CLASSIFIER SIGNATURE:

REPLY TO RF CC NO.:

ACTION ITEM STATUS: [] PARTIAL/OPEN [] CLOSED

APPROVALS: MCB: [Signature] FIG. & TYPIST INITIALS: MRW/aw

ADMIN RECORD

**Kaiser-Hill National Environmental Policy Act (NEPA) Group
ENVIRONMENTAL CHECKLIST
ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE**

1. Project Name: Pre-Remedial Investigation of IHSSs 170, 174A, 174B, Property Utilization and Storage Yard
2. Date Submitted: July 8, 1997
3. NEPA Tracking No.:
4. Charge Number: CB0320FP
5. WAD Number: WAD 1
6. Project Manager (company, bldg., ext.): Mark Wood, RMRS, T893B, x6689
7. Kaiser-Hill Manager (bldg., ext.): Ann Sieben, T130C, x9886
8. Preparer (company, bldg., ext.): Mark Wood, RMRS, T893B, x6689
9. Project Description (be as detailed and specific as possible, use the checklist as a guide for issues to be addressed in the description of the project, submit to K-H NEPA for review):

Summary Scope of Work for the Pre-Remedial Investigation of IHSSs 170, 174a, and 174b, also known as the Property Utilization and Disposal (PU&D) Yard. The purpose of this investigation is to evaluate a potential source of groundwater contamination originating from the PU&D Yard. The IHSSs are located in the northwest buffer zone and were a former storage area for empty drums, cargo boxes, and dumpsters from 1974 until 1994 (Figure 1-1). Empty drums contained unknown residual quantities and types of solvents and wastes. Two areas within IHSS 170 were specified for the storage of hazardous materials. Specifically, IHSS 174a stored empty drums and IHSS 174b was designated for a dumpster. The dumpster contained stainless steel metal chips coated with freon-based or oil-based lathe coolant. Approximately 30 borings will be located in the areas of the existing soil gas anomalies (see attached maps and analytical data summary tables with the hazardous waste determination form). Soil borings will be located over the highest soil gas survey results for each area. A sampling grid of approximately 10 feet will be utilized in areas where the soil gas survey points are 20 feet apart (IHSS 174a and the oil stain area in the center of IHSS 170 and approximately 20 feet will be utilized where the soil gas survey points are 40 feet apart (northeast of IHSS 174a and the south east area of IHSS 170). In addition, a minimum of one soil boring will be located at two areas of surficial soil staining in IHSS 170 and two surface soil VOC anomalies in IHSS 174a. Each boring area will be prescreened with a FIDLER survey and on the basis of the FIDLER survey approximately 3 surface soil samples will be collected for HPGE analysis for radioisotopes. Borings will be advanced using the geoprobe drilling methodology to a depth of 20 feet or 2-3 feet into groundwater. Soil samples for VOC analysis will be collected at 5 foot intervals. A groundwater sample will be collected from each borehole for VOC analysis. Each boring will then be abandoned and surveyed by GPS. In the event that geoprobe borings encounter multiple refusal due to cobbles in the Rocky Flats alluvium, hollow-stem auger drilling methodology will be utilized to complete the scope of work. Particulate monitoring will be performed in accordance with procedure FO.1. Soil cuttings will be containerized and composite sampled for TCLP metals and the depth discrete VOC samples will be used for hazardous waste determinations. The project will be implemented through approved and controlled Sampling Analysis Plan and Site-Specific Health and Safety Plan.

Reviewed for Classification/UCNI

By: _____

Date: _____

	<u>YES</u>	<u>NO</u>	<u>NOTES</u>
10. Will the project require a new or modified permit under the:			
A. Clean Air Act? (e.g., APENs, Rad-NESHAP, fugitive dust, etc.)	_____	_____ X _____	
B. Clean Water Act? (e.g., discharges, chemicals, etc.)	_____	_____ X _____	
11. Resource Conservation and Recovery Act (RCRA):			
A. Will the project generate, treat, store, or dispose of hazardous, radioactive, or mixed waste?	_____ X _____	_____ X _____	
B. Will the project involve a removal?	_____	_____ X _____	
C. Will the project include RCRA closure?	_____	_____ X _____	
-partial?	_____	_____ X _____	
-full?	_____	_____ X _____	
D. Will the project include excavation or capping to meet RCRA requirements?	_____	_____ X _____	
E. Will cost and duration stay within \$5 million and 60 months? (Explain in Section 9, Project Description)	_____ X _____	_____	
F. Will a RCRA permit or permit modification be required?	_____	_____ X _____	
12. Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)			
A. Is the project part of an activity required in the Rocky Flats Cleanup Agreement?	_____ X _____	_____	
B. If the answer to A. is YES, is the project described in a document that has been approved by EPA or CDPHE, or will be approved by at least one of those agencies before project work begins?	_____	_____ X _____	
C. If the answers to both A. and B. are YES, has that document been reviewed by the K-H NEPA group for inclusion of NEPA values?	_____	_____ X _____	
13. Monitoring			
A. Will the project require performance monitoring per RFCA or IA IM/IRA requirements?	_____	_____ X _____	
B. If the answer to A is YES, have appropriate steps been taken to implement those requirements through the Integrated Monitoring Plan?	_____	_____ X _____	
14. Toxic Substances Control Act			
A. Will the project require an Asbestos Abatement permit?	_____	_____ X _____	
B. Will the project generate PCB-containing waste?	_____	_____ X _____	
C. Will the project result in any potential PCB-containing material that would be available for commercial resale, reuse, or recycle?	_____	_____ X _____	

	<u>YES</u>	<u>NO</u>	NOTES
15. Have all steps been taken to ensure compliance with procedures 1-G98-EPR-END.04, Migratory Bird Evaluation and Protection, and 1-D06-EPR- END.03, Identification and Protection of Threatened, Endangered, and Special-Concern Species?	<u>X</u>	<u> </u>	
16. Will the project be in or near an Individual Hazardous Substance Site (IHSS)? (If YES, discuss in Section 9, Project Description)	<u>X</u>	<u> </u>	
17. Will the project construct or require a new or expanded waste disposal, recovery, storage, or treatment facility?	<u> </u>	<u>X</u>	
18. Is the project part of an agreement between DOE and another federal or state agency? (Specify and explain any schedule urgency and deadlines in Section 9, Project Description.)	<u> </u>	<u>X</u>	
19. Is the project:			
A. A new process, building, etc.?	<u> </u>	<u>X</u>	
B. A modification to an existing process, building, etc.?	<u> </u>	<u>X</u>	
C. An installation of capital equipment?	<u> </u>	<u>X</u>	
20. Will the project be located in or adversely affect:			
A. Wetlands? (i.e., dredge or fill operations)	<u> </u>	<u>X</u>	
B. Designated natural areas?	<u> </u>	<u>X</u>	
C. Prime agricultural land?	<u> </u>	<u>X</u>	
D. Special water sources?	<u> </u>	<u>X</u>	
E. Historical, archaeological, or architectural sites or buildings? (NHPA, HUD)	<u> </u>	<u>X</u>	
F. Impact surface water or groundwater	<u> </u>	<u>X</u>	
21. Will the project result in, or have the potential to result in, long term changes to the environment?	<u> </u>	<u>X</u>	
22. Will the project result in changes or disturbances of the following existing conditions:			
A. Noise levels?	<u> </u>	<u>X</u>	
B. Solid wastes?	<u> </u>	<u>X</u>	
C. Radioactive wastes? (including disturbed or excavated contaminated soil)	<u> </u>	<u>X</u>	
D. Hazardous waste?	<u> </u>	<u>X</u>	
23. Will the project have effects on the environment which are likely to be publicly controversial?	<u> </u>	<u>X</u>	

	<u>YES</u>	<u>NO</u>	NOTES
24. Will the project establish a precedent for future projects that will have significant effects, or represent a "decision in principle" about a future consideration?	_____	<u> X </u>	
25. Is the project related to other projects or to a larger program?	<u> X </u>	_____	
26. Have pollution prevention measures been considered? (Discuss in Section 9, Project Description.)	<u> X </u>	_____	
27. Does/Will the project present a radiation health and safety concern during construction or operation? (Price-Anderson Act)	_____	<u> X </u>	

NOTES: