

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

Date/Time: May 8, 2003

Site Contact(s): Susan Serreze, Marla Broussard
Phone: 303-966-2677, 303-966-6007

Regulatory Contact: Carl Spreng, Elizabeth Pottorff, Dave Kruchek, Harlen Ainscough
Phone: 303-692-3300

Agency: CDPHE

Purpose of Contact: Consultative Process Meeting-- Meeting Notes

Discussion

**April 8, 2003, Comment Resolution Meeting
for
IHSS Group 800-2 Data Summary Report
IHSS Group 600-2 Closeout Report
IHSS Group 300-1 Closeout Report**

A meeting was held on April 8, 2003, to discuss the IHSS Group 800-2 Data Summary Report, IHSS Group 600-2 Closeout Report, and IHSS Group 300-1 Closeout Report. The IHSS Group 800-4 Closeout Report was also discussed.

Attendees

CDPHE Harlen Ainscough, Elizabeth Pottorff, Carl Spreng
DOE Norma Castaneda, Russ McCallister, Reg Tyler
K-H Laura Brooks, Marla Broussard, Lane Butler
K-H Team Susan Serreze



A general discussion explaining the new strategy for accelerating the document review process was briefly held.

CDPHE was asked when comments on the Closeout Reports for IHSS Groups 000-1 and 600-1 would be ready. Carl Spreng stated that he was almost finished with the IHSS

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

CEX-105-01

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Group 000-1 and Elizabeth Pottorff stated that the IHSS Group 600-1 Closeout Report had been misplaced, but she is reviewing the document

Lane Butler asked Carl Spreng when an approval letter for the SEP Risk Assessment would be received Carl Spreng stated that he was waiting for the PAM along with the Risk Assessment Marla Broussard clarified that the PAM and Risk Assessment would be finalized and sent to CDPHE Carl Spreng concurred

CDPHE was asked if the final changes to the Closeout Reports for IHSS Groups 100-4 and 100-5 had been verified Elizabeth Pottorff stated that there were additional comments from Tracy Hammon, but she had not yet reviewed them

Data Summary Report titles will be consistent and all will be changed to Characterization Data Summary Report

The calculation for plutonium from americium will be added to all reports where it was used

The next meeting is scheduled for Thursday, April 17, from 11 00 AM to 12 30 PM

IHSS Group 800-2 Data Summary Report

CDPHE comments on the Draft IHSS Group 800-2 Data Summary Report were discussed and the following resolutions were agreed to

General The document will be approved after the RFCA Modifications are approved on April 10, 2003

- 1 The map showing planned sampling locations will be referenced from the appropriate IASAP Addendum and not reprinted in the Data Summary Report Actual locations are listed in tables in the Data Summary Report
- 2 Screens 2, 4, and 6 of the Soil Risk Screen will be reevaluated Concerns that need to be addressed when evaluating the impact to surface water include whether the analyte is a COC, whether it is soluble, and whether there be a groundwater barrier Additionally, it was suggested that the current subsurface RFCA ALs, which include a leachability component, could be used to determine whether subsurface COCs may impact surface water This concept requires further discussion Lane Butler stated that modeling of groundwater to surface water is not needed All agreed that the Soil Risk Screen evaluation will evolve
- 3 The DQA will be rewritten to proposed WRW ALs Additionally, the DQA format will be changed to better accommodate needs and requirements RPD results and associated validation codes will not be included in the DQA, however, a summary of RPD results and validation codes will be considered and included, if appropriate Additional language will be added to the report and DQA indicating QA concerns and

how rejected data or surrogate data failure impacts the project decisions Results with analytes in the blanks will be removed from the data set but not from the raw data The text will be clarified to better communicate significance of the qualifications

- 4 Section 5 2 3 will be rewritten and the tables corrected for consistency with the text Table 7 will be reformatted
- 5 Dave Kruchek will call Susan Serreze to provide specific changes, if necessary
- 6 In accordance with the IASAP, sensitivities are compared to current Tier II ALs However, because this document was written to the proposed WRW ALs, sensitivities will be compared to WRW ALs CRA sensitivities have not yet been developed
- 7 Duplicate data, as well as all data, are available in SWD K-H QA files will also be provided to the agencies

IHSS Group 600-2 Closeout Report

CDPHE comments on the Draft IHSS Group 600-2 Closeout Report were discussed and the following resolutions were agreed to

CDPHE stated that there are additional comments from Dave Kruchek Marla Broussard asked whether CDPHE would delete IHSS Groups 600-2 and 300-1 Closeout Report comments that are the same as those addressed in the IHSS Group 800-2 Data Summary Report comments CDPHE agreed to this

Samples from IHSS Group 400-7 were used in this data summary All of the relevant information will be provided in this document as if it was collected specifically for this activity Figures, tables, calculations, discussions, and the DQA will include these sampling locations and results

- 1 Table 10 will be corrected
- 2 RPD results and associated validation codes will not be included in the DQA, however, but a summary of RPD results and validation codes will be considered and included, if appropriate
- 3 Additional language will be added to the report and DQA indicating QA concerns and how rejected data impacts the project decisions
- 4 Table 16 will be reevaluated as part of the DQA format changes
- 5 In accordance with the IASAP, sensitivities are compared to current Tier II ALs However, because this document was written to the proposed WRW ALs, sensitivities will be compared to WRW ALs CRA sensitivities have not yet been developed

Additional comments received from Elizabeth Pottorff on April 9, 2003

Table 1 page 13, why are there no comments for samples BZ39-A011 and B011?

These sampling locations will be listed as "no significant deviation"

Section 10 1 2 –This discussion is very difficult to follow and appears to indicate that a lot of the data is outside of the established parameters and so is not appropriate to use Why does the % difference shown in Tables 13 and 14 include so many insignificant figures? This makes it very confusing and needs to be changed, as well as the whole discussion

Additional language will be added to the report and DQA indicating QA concerns and how qualified data impact project decisions

Section 10 1 3 This discussion seems rather irrelevant and needs to be changed to properly discuss the subject, and how this data meets this criteria

Section 10 1 4 This discussion regarding Completeness is again completely unintelligible Table 15 - what is this??? Please provide relevant understandable information that shows that the data meet this criteria

Section 10 1 5 This discussion leaves a lot to be desired such as what do the Qualifiers mean and does this data meet the criteria for comparability? Since at least some of the data do not meet the sensitivity requirement does that mean that the data is not validated? This section needs to be properly modified to discuss this criteria and the data validation Table 16, previous versions of this table list validation qualifiers by analyte group, please continue this practice

IHSS Group 300-1 Closeout Report

CDPHE comments on the Draft IHSS Group 300-2 Closeout Report were discussed and the following resolutions were agreed to

This document was written to proposed WRW ALs in accordance with RFCA Project Coordinator agreements and guidance

- 1 "No further accelerated action" will be added
- 2 Sampling location numbers will be added to maps where appropriate, as long as all map elements can still be read
- 3 Results that exceed proposed ecological ALs will be noted in the text

- 4 Text will be added to note that X-ray fluorescence methods cannot detect lithium and what analytes were used to determine contaminants
- 5 The Soil Risk Screen will be reevaluated Concerns that need to be addressed when evaluating the impact to surface water include whether the analyte is a COC, whether it is soluble, and whether there be a groundwater barrier Additionally, it was suggested that the current subsurface RFCA ALs, which include a leachability component, could be used to determine whether subsurface COCs may impact surface water This concept requires further discussion Lane Butler stated that modeling of groundwater to surface water is not needed All agreed that the Soil Risk Screen evaluation will evolve
- 6 Results that exceed proposed ecological ALs will be noted in the text
- 7 In accordance with proposed RFCA modifications, SORs will be calculated for radionuclides only Harlen Ainscough stated that the nonradionuclide SOR is not technically valid because it combines all nonradionuclides and does not take into account target organs
- 8 Table 6 and the associated figure will be corrected
- 9 GIS information needed to determine residual contamination does not need to include IHSS or AOC boundaries
- 10 This section will be changed to include how the agencies can access the "PlanvsActual" database or other QA data This database or other QA data for all closeout and data summary reports will be made available to the agencies
- 11 RPD results and associated validation codes will not be included in the DQA, however, a summary of RPD results and validation codes will be considered and included, if appropriate
- 12 A conclusion section will be added to this and other closeout and data summary reports that justifies the NFAA decision The ALARA evaluation does not determine whether an action is required, but whether additional action is required

IHSS Group 800-4 Closeout Report

CDPHE comments on the Draft IHSS Group 800-4 Closeout Report were discussed and the following resolutions were agreed to

Executive Summary

The stewardship language was developed by DOE in consultation with the RFCA Project Coordinators DOE will discuss the stewardship concerns with CDPHE

Section 2 4

Figures 11a and 11b will be corrected as necessary

Section 3 0

The word "no" will be removed from the sentence
Stockpiled samples were dispositioned by D&D

Figure 10

The legend in the figure will note that Building 886 is no longer standing

Section 5 1

The text will be changed so it is consistent with the figures

Section 5 2

The stewardship language was developed by DOE in consultation with the RFCA Project Coordinators DOE will discuss the stewardship concerns with CDPHE

Section 5 3

The stewardship language was developed by DOE in consultation with the RFCA Project Coordinators DOE will discuss the stewardship concerns with CDPHE

Section 7

Incidental water was sampled to determine whether treatment was necessary before disposal An evaluation of water contamination is outside the scope of this document

Section 10 comments were provided to Elizabeth Pottorff who read them and said that the responses were acceptable

Section 10

The purpose of the DQA section is to communicate significant qualifications to data users Qualifications to analytical/radiological results (resulting from the DQA performed concurrently with the Closeout Report) are considered in the decision-making process The current decision is not to remediate, and this decision is within the qualitative and quantitative confidence requirements as stated in the IASAP DQOs The text will be clarified to better communicate significance of the qualifications

Section 10 2 2

The first sentence of the second paragraph will be revised (abbreviated) to "*LCSs were collected at adequate frequencies (i.e., ≥1/lab batch), and were within QC tolerances*" The previous wording indicated that LCS data were not available electronically, but not necessarily that LCSs were not performed to adequate frequency or recovery specifications V&V of hardcopy results (data packages) include LCS evaluation, and the V&V results summarized in Table 10 indicate that LCS frequencies and results are

satisfactory

As stated in Section 10 2 2, the action taken relative to the noted issue is that analytes of interest (Cd and Pb) are estimated low in field sample 02E0020-002 due to a potential low bias in the spike recoveries. The following text will be added to the end of the second paragraph in Section 10 2 2: *“Given that maximum concentrations of Cd and Pb across the area of interest (~7 and 55 ppm, respectively) were detected in samples other than the one potentially biased low, and that Tier II ALs are more than 17 times the maximum concentrations, it is highly improbable that low bias is causing false negative results for these two metals (i.e., highly improbable that metals are below the AL when one or both are actually above the AL). Therefore, it is concluded that any low bias in the sample of interest does not impact project decisions.”*

Methylene chloride will be removed from figures, tables, and text as appropriate.

Section 10 2 4

The last statement of the third paragraph will be revised to state: *“Overall, data rejection was minimal (i.e., well less than the DQO of 10%), and the completeness percentage of >90% was achieved.”* Table 9, and the first two paragraphs of Section 10 2 4, will be omitted.

The Site is currently working on developing a new DQA format.

Distribution

S Gunderson, CDPHE
D Kruchek, CDPHE
E Pottorff, CDPHE
C Spreng, CDPHE
T Rehder, USEPA
G Kleeman, USEPA
N Castenada, RFFO
R DiSalvo, RFFO
R McCallister, RFFO
S Surovchak, RFFO
R Tyler, RFFO

L Brooks, K-H ESS
M Broussard, K-H RISS
L Butler, K-H RISS
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Administrative Record
ER Meeting Minutes

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