

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE ER REGULATORY CONTACT RECORD

Date/Time: June 17, 2004 / 10:30 a.m.

Site Contact(s): DOE: Norma Castaneda
K-H: Lane Butler
K-H Team: Susan Serreze

Phone: 303/966-5223

Regulatory Contact: See Attendees below
Phone: 303/692-2035-CDPHE
303/966-4226-DOE

Agency: CDPHE: Dave Kruchek, Carl Spreng, Harlan Ainscough,
Elizabeth Pottorff
EPA: Sam Garcia
DOE: Norma Castaneda

Purpose of Contact: Comment Resolution Meeting for the Draft IHSS Group 500-2 Closeout Report, Draft IHSS Group 500-4 Data Summary Report and Draft IHSS Group 800-5 Data Summary Report.

Discussion
See meeting minutes below

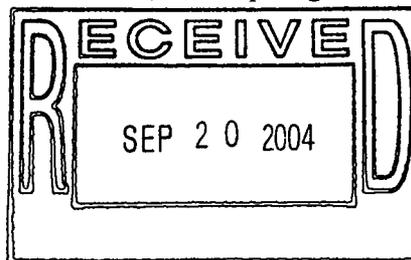
Contact Record Prepared By: Susan Serreze

A meeting was held on June 17, 2004 to discuss the Draft IHSS Group 500-2 Closeout Report, Draft IHSS Group 500-4 Data Summary Report, and the Draft IHSS Group 800-5 Data Summary Report.

I. Attendees

CDPHE: Harlan Ainscough, Dave Kruchek, Elizabeth Pottorff, Carl Spreng
EPA: Sam Garcia
K-H: Lane Butler, Lee Norland
K-H Team: Susan Serreze

II. Report Status



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No reports were distributed.

III. Issues

No Sitewide issues were discussed.

Specific Comments

Draft IHSS Group 500-2 Closeout Report

The following resolutions were agreed to:

- The confirmation samples will be added to Table 1, the discrepancy table.
- The title of Table 3 will be changed to: IHSS Group 500-2-IHSS 158 Accelerated Action Characterization Data Greater than Background means plus two standard deviations or RL.
- In the legend on Figure 5, the remediation reference will be changed to Figure 4.
- In Screen 1 of the SSRS the phrase of RL will be added to the reference to the figures.
- In Screen 3 of the SSRS, the following statement will be added: “ Attachment 14 is specific to Original Process Waste Lines and is not applicable to IHSS Group 500-2.
- In Screen 4 of the SSRS, the word “No” will be added. Additionally, a statement that this IHSS Group is not in an area prone to erosion will be added.
- In Screen 4 of the SSRS, a statement will be added that indicated that surface water impacts would be evaluated in the CRA and groundwater impacts would be evaluated in a groundwater IM/IRA. It is noted, that soil at IHSS Group 500-2 could potentially impact groundwater.
- In Screen 4 of the SSRS, the comparisons to WRW ALs will be deleted.
- The last complete sentence in Section 13.1, subsection “Field Blank Evaluation”, last complete sentence, will be changed to: “ In IHSS Group 500-2, none of the results from blank analyses, when multiplied by 10, exceed the WRW ALs.”
- Text will be added to Section 13.2.3 indicating that V&V percentages for the project are less than 10% but the ER Program V&V goal continues to be attained.
- Table 4 referenced in the March 15, 2004 Regulatory Contact Record will not be attached to the contact record.
- Sampling details for five sampling locations beneath Building 551 will be more accurately described in the report. This will include more detail on the sample depths and media, number of sampling locations and sampling location codes, and that results were less than WRW ALs.

- The boundary of the chemical disposal area at northeastern corner of the IHSS will be shown on the appropriate figures. A statement that the samples were collected to the appropriate depth and that there were no AL exceedances will be added. Additionally, a statement that the gravel layer was not found, however, water was encountered at this location will be added to the text.
- Results from two boreholes in the northeastern corner of the IHSS indicated that VOCs were detected. A statement indicating that VOCs will be addressed as part of the groundwater IM/IRA will be added. Additionally, these samples were listed as statistical sampling locations but they were biased. This will be changed in Table 1.

Draft IHSS Group 500-4 Data Summary Report

The following resolutions were agreed to:

1. Because there were inconsistencies in how sample depths were recorded in the field additional detail will be added to the comment column in Table 1.
2. The reason why VOC sampling was not conducted at sampling location CB42-010 will be further explained.
3. In Screen 4 of the SSRS, the word “yes” will be changed to “no”
4. In Section 6.2.1, subsection Laboratory Control Sample Evaluation, second paragraph, the text will be changed to the following: “If the maximum sample result divided by the lowest LCS recovery for that analyte is less than the WRW AL, no further action is taken because any indicated bias is not great enough to correct a false low sample result to one above the AL.”
5. In Section 6.2.1, subsection Sample Matrix Spike Evaluation, a statement indicating that one arsenic result was greater than the WRW AL and one was very close to the WRW AL and that both samples were in the subsurface will be added. Additionally, a statement that the low MS recoveries for arsenic did not affect project decisions because the decision whether or not to remediate included the results of the SSRS as well as the AL comparison will be added.
6. In Section 6.2.1, subsection 2, Sample Matrix Spike Evaluation, a statement will be added indicating the corrected chromium result (CB41-011) was in the subsurface and the low MS recoveries did not affect project decisions because the decision whether or not to remediate included the results of the SSRS as well as the AL comparison.

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Draft IHSS Group 800-5 Data Summary Report

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The following resolutions were agreed to:

1. The statement “Depth interval represents a grab sample.” Will be added to Table 2 comments for locations CF33-010, CF33-012, CF33-013, CF34-021, CF34-023,

and CF34-024. The data were reviewed and four bottles of soil were collected for each of the following sampling locations - CF33-010, CF33-012, CF33-013, and CF34-021. Six bottles of soil were collected for each of the following sampling locations CF34-023, and CF34-024.

2. In Section 2.3, 2nd paragraph the text will be changed to “SORs for non-radionuclides were not calculated because the only analytes detected at 10 percent or greater than the associated WRWs were polyaromatic hydrocarbons (PAHs) which are not required to be reported.”
3. In Screens 2 and 4 of the SSRS, the following text will be added: “It is anticipated that approximately 3 feet of soil will be added to this area; therefore reducing the potential for erosion.”
4. In Screen 4 of the SSRS, the following text will be added: “VOC surface water AL exceedances included bromodichloromethane, chloroform, methylene chloride, and tetrachloroethene. Tetrachloroethene was not detected in any surface soil samples, and was detected at two subsurface sampling locations (CF33-002 and CF33-007) at levels slightly above the reporting limit (refer to Table 3). Methylene chloride was detected in both groundwater and surface water at downgradient sampling locations in exceedance of the associated ALs. However, this analyte was not detected at any soil sampling location for IHSS Group 800-5.”
5. In Screen 4 of the SSRS, the following text will be added: “Potential impacts from the anticipated land reconfiguration will be addressed in the CRA.”
6. In Section 4.0, second bullet the following text will be added: “It is anticipated that approximately 3 feet of soil will be added to this area; therefore reducing the potential for erosion.”
7. In Section 4.0, third bullet, the following text will be added after first sentence: “No PAH exceedances were detected in surface water or groundwater locations downgradient of IHSS Group 800-5. Concentrations of tetrachloroethene were detected at two surface water locations above the surface water AL. Although tetrachloroethene was detected at two subsurface soil sampling locations (CF33-002 and CF33-007), the detected concentrations were only slightly higher than the reporting limit. Methylene chloride was detected in both groundwater and surface water at downgradient sampling locations in exceedance of the associated ALs. However, this analyte was not detected at any surface soil sampling location for IHSS Group 800-5.”
8. In Section 5.2.1, Sample Matrix Spike Evaluation, 2nd to last sentence will be changed to: “Although benzo(a)pyrene had a 0 percent recovery, and a 61 percent LCS recovery, the concentration of benzo(a)pyrene exceeded the WRW AL at sampling location CF33-007; therefore a low bias of this analyte would still exceed the WRW and would not impact decisions regarding this analyte.”

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