

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

---

**Date/Time:** March 17, 2005 / 10:00 a.m.

**Site Contact(s):** K-H: Karen Wiemelt, Susan Serreze

**Phone:** 303-692-2035 – CDPHE  
303/312-6312 - EPA  
303/966-4226 – DOE

**Agency:** CDPHE: Harlen Ainscough, Dave Kruchek, Elizabeth Pottorff  
EPA: Sam Garcia, Larry Kimmel  
DOE: Norma Castañeda

---

**Purpose of Contact:** A meeting was held on March 17, 2005 to discuss IHSS Group 700-3 Closeout Report, Outside IHSSs and the IHSS Group NE-1 North Firing Range

---

**Discussion:** See meeting minutes below.

---

**Contact Record Prepared By:** Susan Serreze

---

**March 17, 2005 Comment Resolution Meetings  
For  
IHSS Group 700-3 Closeout Report Outside IHSSs  
IHSS Group NE-1 North Firing Range**

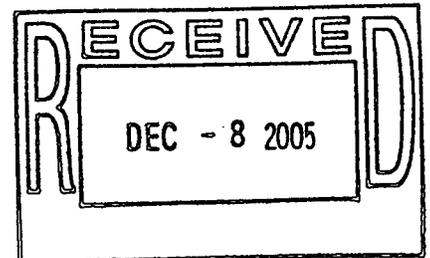
A meeting was held on March 17, 2005 to discuss IHSS Group 700-3 Closeout Report, Outside IHSSs and the IHSS Group NE-1 North Firing Range

Attendees

DOE: Norma Castaneda  
CDPHE: Harlen Ainscough, Dave Kruchek, Elizabeth Pottorff  
EPA: Sam Garcia, Larry Kimmel  
K-H Team: Karen Wiemelt, Gerry Kelly, Susan Serreze

Report Status

Issues



ADMIN RECORD

IA-A-002897

17

No Sitewide issues were discussed.

### Specific Comments

#### **IHSS Group 700-3 Closeout Report, Outside IHSSs**

The attached written comments were received from CDPHE and EPA. The following resolutions were agreed to:

- Text regarding the placement of HRC, as discussed with CDPHE will be added. Additionally, will also describe that the remediation was not contingent on WRW ALs, but it was important to know what was being left behind.
- All other comments will be addressed.

#### **IHSS Group NE-1 North Firing Range Notification**

The attached written comments were received from EPA. Comments from CDPHE were received at the meeting. The following resolutions were agreed to:

- All sampling locations with results less than background will be put on the maps.
- The text will be revised to state what the post-remediation configuration will look like (spread out berms, etc.).
- The text will be clarified to indicate that the remediation is to WRW soil ALs and that the berms will be spread out pending the results of the AAESE.

All other EPA comments will be addressed.

### **Other Issues**

There were no other issues for discussion.

#### **V. Meetings**

The next meeting will held on March 31 at 10:00 AM in the Breckenridge Room.

**Colorado Department of Public Health and Environment**  
**Hazardous Materials & Waste Management Division**

**Comments**

**Draft Closeout Report**

**For IHSS Group 700-3**

**Volume 1**

**UBC 701, IHSS 700-118.1, IHSS 700-118.2, IHSS 700-131, IHSS 700-132, IHSS 700-144(N), IHSS 700-144(S), IHSS 700-150.2(S), IHSS 700-150.4, IHSS 700-150.7, IHSS 700-1100, PAC 700-1116  
and Portion of IHSS 000-121, Including Tanks 9 & 10**

**March 2005**

---

**Specific Comments:**

- 1. Section 2.1, IHSS 700-131:** In the narrative and also, preferably, on the figure, please indicate the location of the gas-bottle dock relative to the building. Please address Door 17 in the same manner.
- 2. IHSS 700-144(N):** The discussion can be improved by sub-sectioning. The Division suggests that the last paragraph of Section 7 be moved to the top of the section to provide historical perspective. This would then support sub-sectioning of the 144(N) and 144(S) narratives.
- 3. Page 7:** The last sentences of the second and third paragraphs appear to be redundant. Please address.
- 4. OPWL (IHSS 000-121)...:** The second paragraph, page 10, notes an east-west orientation for the T-9 tanks. "Orientation" implies the long axis of the tanks, which would further imply they tank are north-south of one another, not east-west. Figure 8 labeling further confuses the issue. The T-9 tanks are 22,500 gal/each and T-10 tanks are 4500 gal/each, but the T-9 label appears to mark the smaller (T-10) footprints. Please address comprehensively.
- 5. Table 2:** Boring CF46-006 and CF46-007, OPWL biased locations, were moved eight feet and six feet, respectively, to avoid process waste lines. (Note CG44-005, CH46-001 and CH46-002, page 22, that were moved to target OPWL and other OPWL locations on page 22 that were not significantly located.) The data

are questionable. Were the lines at these locations removed; were confirmation samples collected? These appear to be field decisions not supported by a CR (a CR may have specified a data substitution, such as confirmation sampling). Please address.

- 6. Section 2.4:** Considering that residual arsenic exceeds the WRW in subsurface soils, process derivation of arsenic must be considered. Inclusion of arsenic in SORs (for surface soils only as prescribed) would be warranted if a process link existed. (The Division and EPA have previously noted this SOR driver for other sites at RFETS.) Please evaluate building processes. If no link is found, such should be discussed in the narrative as a basis for excluding arsenic from the SOR.
- 7. Section 3.1:** The “removal” of groundwater wells suggests that the wells were not abandoned per State Engineer’s Office procedures. Please address.
- 8. Page 74:** The placement of HRC four feet above the base of the excavation, then six and eight feet higher above compacted soils, is inconsistent with prior discussions with the LRA. A concurrence CR is not evident to support the alternate approach. Although ground water may percolate vertically and carry the HRC into the carbon tetrachloride, lateral flow may be prevalent. It appears that an evaluation of the many factors of groundwater flow, including final land configuration and natural cover, is needed to determine whether the approach is adequate. Please address.
- 9. Section 3.3:** Consistent with the sidewall sampling issues of the Bowman’s Pond site, where were confirmation samples collected, i.e., at the base of sidewalls or on excavation slopes. Please address.
- 10. Figure 9:** Please show the previous footprints of Building 730 and of Tanks 9 and T-10 within the excavation area. Also show the portion of the slab that remains relative to the sampling locations.
- 11. Screen 4:** On page 90, please answer “Yes” or “No”. Also, please specifically evaluate the potential for the high chromium residual, 11,000 mg/kg at one location, to impact surface water.

**The following are EPA's comments on the subject report.**  
**IHSS Group 700-3 Outside IHSSs**

**Specific Comments**

Page 64, Section 2.3, first bullet.

The sentence states, "The americium-241 activity in surface soil at sampling location CE46-019 (within UBC 701) was 3,438 pCi/g, exceeding the WRW AL of 76 pCi/g." According to Figure 7, plutonium 239/240 also exceeded the WRW AL at a concentration of 19,596 pCi/g at sampling location CE46-019. Please state this in this bullet as well.

Page 101, first paragraph.

This paragraph states that iron failed the LCS evaluation. However, according to Table 15, the minimum and maximum concentrations reported for iron are within quality control limits. Please explain why iron failed this evaluation, or provide more information in the text.

Page 106, Sample Matrix Evaluation.

The text identifies aluminum, iron, manganese, and mercury as having matrix spike recoveries of 0 percent. According to Table 18 (page 118), pyrene and fluoranthene also had matrix spike recoveries of 0 percent. Please add these two compounds to this paragraph.

Page 116, first bullet.

This bullet states, "Subsurface soil in the area is not subject to significant erosion, and all residual subsurface soil concentrations are less than WRW ALs." According to page 91, benzo(a)pyrene, arsenic, chromium remain in the subsurface that exceed WRW ALs. Please revise this statement.

**EPA Comments for Draft ER RSOP Notification #05-05  
IHSS Group NE-1, PAC NW-1505  
North Firing Range  
March 2005**

**March 16, 2005**

**Specific Comments**

1. **Page 1, Introduction, paragraph 6.** This paragraph states, "One of four original lead exceedances (BV53-031, 1,540 milligrams per kilogram [mg/kg]) determined using the SW-846 6200 (XRF) method was not confirmed when results determined by the preferred SW-846 6010 ICP) method became available (equivalent location BV53-047, 650 mg/kg). Therefore, only three locations will be remediated." Please describe the location of BV53-047 in relation to BV53-031, specifically, in terms of an "equivalent location". Additionally, please identify BV53-031 on Figure 4.
2. **Page 5, Section 2.1, Project Conditions.** In addition to the activities listed in this section, the project conditions should describe prior soil removals to the North berm relevant to the sampling results. It is understood that soil from the North berm had been previously moved from the front face to the back side of the berm, resulting in lower-than-expected lead concentrations currently observed on the front face of the primary target.
3. **Page 8, Table 2.** According to Table 2, the three locations that require excavation are BV53-036, BV53-055, and BW53-001. However, Figures 3 and 4 identify BV53-033 as an area of remediation and do not identify BV53-036. Please address this discrepancy.
4. **Page 5, Section 2.2, Screen 1.** This section states, "Based on the accelerated action sampling, all subsurface metal concentrations were below the WRW ALs." According to Table 2, nine samples were collected at a depth of 0.5 to 2.5 feet below ground surface (bgs). None of the samples present results for lead, the principal contaminant of concern for this RSOP. Additional sampling results for lead that would justify the conclusion for Screen 1 should be summarized in the text and/or presented in Table 2.
5. **Page 22, Section 2.3, Remediation Plan.** This section briefly describes the disposition of the residual berm material at the North Firing Range. To assure that any potential RCRA requirements are met, this discussion should reference the guidance document *Corrective Action at Outdoor Shooting Ranges*, published by Colorado Department of Public Health and Environment (CDPHE), January 2005, as a basis for determining the proposed accelerated actions.

