

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

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**Date/Time:** September 1, 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, Carl Spreng  
EPA: Sam Garcia, Larry Kimmel  
DOE: Norma Castañeda

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**Purpose of Contact:** A meeting was held on September 1, 2005 to discuss the Draft Closeout Report for NPWL, Draft Closeout Report for IHSS Group 700-3 UBCs, and NW Area HRR Write ups

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**Discussion:** See meeting minutes below.

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**Contact Record Prepared By:** Susan Serreze

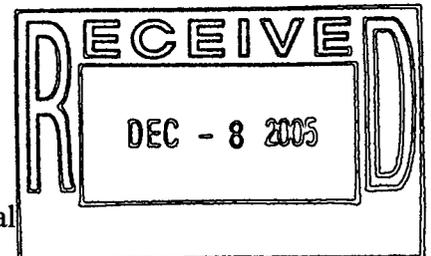
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**September 1, 2005 Comment Resolution Meetings  
For  
Draft Closeout Report NPWL  
Draft Closeout Report IHSS Group 700-3 UBCs  
NW Area HRR Write ups**

A meeting was held on September 1, 2005 to discuss the Draft Closeout Report for NPWL, Draft Closeout Report for IHSS Group 700-3 UBCs, and NW Area HRR Write ups

Attendees

CDPHE: Harlen Ainscough, Dave Kruchek, Carl Spreng  
EPA: Sam Garcia, Larry Kimmel, Todd Bechtel (Greystone)  
DOE: Norma Castaneda  
K-H Team: Karen Wiemelt, Susan Serreze, Steve Nesta, Gary Carnival



II. Report Status

ADMIN RECORD

IA-A-002900

1/15

## Issues

No Sitewide issues were discussed.

## Specific Comments

### **Draft Closeout Report for NPWL**

Written comments were received from CDPHE. The following resolutions were agreed to:

1. The sixth bullet on page ES-2 will be rewritten to correctly describe valve vault removal.
2. An additional bullet will be added to the Executive Summary to address removal of NPWL that were not clean closed.
3. Section 2.2.1 will be revised to remove sections not relevant to NPWL.
4. In Section 2.2.1, the discussion of the MTS will be separated from the 750 Pad decant water discussion.
5. In Section 2.2.1, the above ground NPWL between the MST, B910, and Building 374 will be added to the figure.
6. In Section 2.2.2, the discussion of the impact to the OPWL from PAC 100-602 will be removed from the text.
7. In Section 2.2.3, the discussion of the OPWL release will be removed from the discussion.
8. In Section 2.2.3, the discussion of PAC 100-611 will be reviewed for relevance to NPWL.
9. In Sections 2.2.4 and 2.2.5 discussions specific to NPWL will be retained.
10. In Section 2.2.4, the leaks discussed in the text will shown on the figure.
11. OPWL sampling locations will be deleted from Table 3 or their applicability will be explained. Additionally, if these locations are not applicable, they will be removed from all tables and figures.
12. In Section 2.3.1, the text will be changed to clarify that the characterization and confirmation samples are specific to NPWL.
13. In Section 2.3.2, it will be noted that sampling location BX44-001 was the location of a repair to the NPWL.
14. On Figure 4 the relevance of the four sampling locations northwest of Building 771 will be evaluated. If these locations are not relevant they will be deleted from text, tables, and figures.
15. In Section 4.1, the description of the MSTs will be expanded and they will be added on the figures.

16. In Section 6.0 a reference will be added to the 2004 RCRA Permit.
17. In Section 7.0, the RFCA areas prone to landslides will be added to the map or the text will be expanded to include the appropriate information.
18. In Section 7.0 a note will be added stating that Attachment 14 is specific to OPWL.
19. In Section 7.0, Screen 4 additional information will be added to indicate the relevant sections of the report.
20. Section 8.1 will be modified to add the word "of".
21. In Section 8.2 the first bulleted item will be included in the preceding paragraph.
22. In Section 14.2.1 additional text regarding surrogates will be added.
23. In Section 14.3 additional text will be added to explain field duplicates.
24. The RCR dated June 28, 2005 will be deleted if not applicable to NPWL.

#### **Draft Closeout Report for IHSS Group 700-3 UBCs**

Written comments were received from EPA. The following resolutions were agreed to:

25. The sampling points omitted from Figure 2 will be corrected.
26. The sampling point omitted from Figure 3 will be corrected.
27. In Section 3.0, the accelerated action activities completion date will be corrected.
28. On Page 101, the reference to sampling location CE45-118 will be corrected to read CF45-118.
29. Section 6.0, Screen 1 will be changed to correctly reflect the RFCA text.
30. Figure 7 will be corrected so that analytical results greater than WRW soil ALs are shown in red.
31. Section 6.0 Screen 3 will be changed to correctly reflect RFCA.
32. Page 108, top of page, will be changed to correctly reflect RFCA.
33. Page 108, Section 7.1, will be changed to correctly reflect RFCA.
34. Section 14 will be changed to correctly reflect RFCA.

#### **NW Area HRR Write up**

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

##### *CDPHE comments*

1. All HRR write ups will be changed to either an IHSS or PAC Investigation section heading for consistency.
2. PAC NW-114 – the reference to the IM/IRA approval letter will be added.

3. PAC NW-170 – the maximum concentrations of soil COCs and a comparison to the appropriate AL will be added.
4. PAC NW-170 – the PAC Investigation heading will be added along with a statement regarding accelerated action sampling.
5. PAC NW-170 – the reference to the agency approval letter will be added.
6. PAC NW-174a – the reference to the agency approval letter will be added.
7. PAC NW-174b – the maximum concentrations of soil COCs and a comparison to the appropriate AL will be added.
8. PAC NW-174b – the phrase “Als” will be changed to “ALs” in the second paragraph of PAC Investigations.
9. PAC NW-174b – the reference to the agency approval letter will be added.
10. PAC NW-195 – the reference to the agency approval letter will be added.
11. PAC NW-203 – the phrase “Als” will be changed to “ALs” in the third paragraph of the PAC Investigation.
12. PAC NW-203 – the reference to the agency approval letter will be added.
13. PAC NW-1500 – The text will be changed in the PAC Investigation section that because the soil was immediately removed, accelerated action sampling was not necessary.
14. PAC NW-1500 – the reference to the agency approval letter will be added.
15. PAC NW-1501 – the reference to the agency approval letter will be added.
16. PAC NW-1502 – The text will be changed in the PAC Investigation section that because the soil was immediately removed, accelerated action sampling was not necessary.
17. PAC NW-1502 – the reference to the agency approval letter will be added.
18. PAC NW-1503 – The text will be changed in the PAC Investigation section that because the soil was immediately removed, accelerated action sampling was not necessary.
19. PAC NW-1503 – the reference to the agency approval letter will be added.
20. PAC NW-1504 – The text will be changed in the PAC Investigation section to indicate why accelerated action sampling was not required.
21. PAC NW-1504 – the reference to the agency approval letter will be added.
22. PAC NW-1505 – the phrase “Als” will be changed to “ALs” in the third paragraph of the PAC Investigation.
23. PAC NW-1505 – additional text will be added regarding the consultative process decision regarding arsenic.

### *EPA Comments*

1. PAC NW-114 – the text will be changed so that upgradient wells will be discussed then, downgradient wells.
2. PAC NW-114 – the date of the IM/IRA approval will be checked and corrected as necessary.
3. PAC NW-170 – additional information on vanadium will be added.
4. PAC NW-170 – the first sentence in the No Further Action Recommendation section will be revised for readability. Additionally, the LRA will be identified.
5. PAC NW-195 – the LRA will be identified.
6. PAC NW-1502 – the PAC will be identified on the map.
7. NW Area Figure – IHSSs and PACs that are not part of this HRR Area will be removed from the map.

### **Other Issues**

The five PT/TR sampling locations discussed during the consultative process were resampled. These locations were resampled because a decision on whether to remediate the locations was being considered. The samples were not collected in accordance with IABZSAP and were not comparable to ER RSOP decision criteria. Samples were collected from the first one or two millimeters of soil over either a 2.5 or 10 acre area. The locations were resampled in accordance with current DQOs so that the data could be used for remediation decisions. The sample results associated with the PT/TR samples were declared NLR and the sampling results associated with the recent samples are considered representative of these locations. Samples were analyzed using alpha spectrometry methods.

While the results of some PT/TR samples were used in the CRA and RI/FS data analyses, these results are extremely conservative.

### V. Meetings

The next meeting will be held on September 8, 2005 at 10:00 AM in the Breckenridge Room.

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

**Additional Comments**

**Draft Closeout Report**

**for**

**New Process Waste Lines (NPWL)**

**August 2005**

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**Clarification:**

The Division provided initial comments on the document and sought changes to some of the content. The following comments suggest that some of the same paragraphs or content be deleted as irrelevant to the NPWL. As a result, Comment Nos. 3, 6, 7, 8, 11, 14 and 24 should be used to consider individually whether modification or deletion is the better option in order to focus on the NPWL system.

It is understood that information on some releases may be appropriate for inclusion as the best means of disposition to NFAA. If that is the case, such content should be noted in the Executive Summary, noted as additional in the body of the report and separated from the main elements, e.g. NPWL specific characterization, removal or closure, and soil remediation.

**Specific Comments:**

**Executive Summary:**

- 1.** The sixth bullet on page ES-2 is not well written. The vaults were either completely removed, or if the upper portions of the vaults were excavated, the lower portions were backfilled with soil or flow fill.
- 2.** The sixth bullet discusses the vaults; the seventh bullet discusses RCRA-clean lines (i.e. Remaining NPWL.) An additional bullet should be added to discuss the removal of lines that were not RCRA-clean closed in place.

**Section 2.2.1:**

- 3.** The first three paragraphs, principally a discussion of the SEP's history, is irrelevant and distracting to a focus on NPWL characterization, removal and soil remediation. Please

consider deleting, the fourth paragraph appears to be sufficient, with modification as noted below.

4. The fourth paragraph, first paragraph of page 6, should be modified to separate the discussion of the MST from the 750 Pad decant waters. They are separate events, with separate locations and occurred at separate times during the operation. Please include a brief description of the MSTs and state their location relative to the SEPs.
5. The above ground NPWL between the MSTs, B910 and connecting to B374 should be shown in its entirety on the appropriate figure(s) as it is part of RCRA unit 374.3.

**Section 2.2.2:**

6. Most of the discussion of PAC 100-602, unlike the majority of the SEP discussion, is pertinent to the NPWL characterization, etc. and should be used as an example of what to include in this report. That said, the inclusion of impacts to nearby OPWL do not appear to be relevant to the characterization, removal and remediation of the NPWL system.

**Section 2.2.3:**

7. This section, except possibly the last two paragraphs, discusses an OPWL release and does not appear pertinent to the NPWL system. It is unclear whether the last two paragraphs discuss sampling of NPWL or the OPWL, or in essence both. If applicable to the NPWL, please retain with clarification to that effect. Additionally, if these are significant sampling events should they not been shown on Figure 2?
8. The discussion of PAC 100-611 may not be relevant to the NPWL. The release appears to have occurred prior to entry into the NPWL system, not as a release from the NPWL lines or vaults.

**Section 2.2.4 and 2.2.5:**

9. These discussions are specific to the NPWL and should be retained.
10. In Section 2.2.4, the several leaks discussed do not appear to be fully represented on the figure(s). Please pinpoint and label each release site and migration pathway.

**Table 3:**

11. On pages 16, 23 and 26 sample locations specific to OPWL have been included. Either delete from all figures, tables and calculations (SORs) or note applicability to the NPWL characterization effort.

**Section 2.3.1:**

12. It is not made clear that the characterization and confirmation samples are specific to NPWL. Please address.

**Section 2.3.2:**

- 13.** In the third paragraph of the section, please note that BX44-001 was the location of a repair in the NPWL pipeline.

**Figure 4:**

- 14.** Please consider the pertinence of the four sample locations shown northwest of the former B771 location. Delete from the figures, data summaries, and calculations as necessary.

**Section 4.1:**

- 15.** Section 2.2.1's description of the MSTs is insufficient; however, the Division believes it is of three modular tanks constructed in 1995-6, north, not south, of the SEPs across Walnut Creek. Please address. Also, please identify the MST on the figure(s).

**Section 6.0:**

- 16.** It may be appropriate to reference the 2004 RCRA Permit in addition to the 1997 version. The CDDs were linked to the 1997 permit.

**Section 7.0:**

- 17. Screen 2,** Please show and reference the lines within the potential landslides areas on a figure or clearly state the numbered area and portion of lines being discussed.
- 18. Screen 3,** Please include a notation that Attachment 14 is applicable only to OPWL.
- 19. Screen 4.** In the second bullet of page 67, please indicate the specific subsection from 2.2.1-2.2.15.

**Section 8.1:**

- 20.** Please modify the sentence to read, "excavation of radionuclide contaminated soils."

**Section 8.2:**

- 21.** The first bulleted item should be included in the preceding paragraph and not be bulleted.

**Section 14.2.1:**

- 22.** On page 83, please be more specific on the review criteria applied to surrogates. That is, were surrogate recoveries compared to WRW values for COCs that the surrogates were intended to represent?

**Section 14.3:**

- 23.** The summary is insufficient; also discuss the failure to collect and the ramifications of insufficient percentages of field duplicates.

**Appendix A:**

**24.** The RCR dated June 28, 2005 is specific to the OPWL. and does not appear to be pertinent to the NPWL activities. Please address.

**EPA Comments  
Draft Closeout Report  
IHSS Group 700-3, Volume II  
August 2005**

**Specific Comments**

1. **Page 31, Figure 2.** Several sampling points have been omitted from the figure. Data boxes are included; however, their corresponding locations are not identified (CE45-123, CE45-21, CE45-95, and CE45-127). Please correct the discrepancy.
2. **Page 32, Figure 3.** Sampling point CG46-036 has been omitted from the figure. A data box is included; however, the corresponding location is not identified. Please correct the discrepancy.
3. **Page 66, Section 3.0, second paragraph.** The first sentence states, "Accelerated action activities were conducted between November 2003 and July 2005." The table just below this statement shows accelerated activities were completed in August 2005. Please correct the discrepancy.
4. **Page 101, first paragraph, third sentence.** Reference is made to the four sampling locations that have SORs that exceed 1. The third sampling location, CE45-118, should be corrected to read CF45-118.
5. **Page 103, Section 6.0, Screen 1.** The last part of the sentence states, "however, these activities are at depths greater than 3 ft below final grade and less than 1nCi/g in compliance with RFCA." However, Figure 2 identifies one sampling location, CF45-122, with activities for Americium-241 (1.24 nCi/g) and Plutonium 239/240 (7.06 nCi/g) at levels greater than 1 nCi/g. Please revise this statement and reference, if necessary, appropriate contact record.
6. **Page 105, Figure 7.** Data boxes associated with samples CF45-118, CF45-119, and CF45-154 should be shaded red as there are analytical results that exceed WRW ALs.
7. **Page 107, Screen 3.** Please revise statement based on response to comment 5 above.
8. **Page 108, top of page.** Please revise statement based on response to comment 5 above.
9. **Page 108, Section 7.1, fourth bullet.** Please revise statement based on response to comment 5 above.
10. **Page 129, Section 14, second bullet.** Please revise statement based on response to comment 5 above.

**Colorado Department of Public Health and Environment**

**Hazardous Materials & Waste Management Division**

**Comments**

**Draft**

**NW Area PACs**

**Comprehensive**

**Historical Release Report**

**2005**

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**General Comment:**

- 1.** Please use either an IHSS or PAC Investigations section heading for consistence across the PACs.

**Specific Comments:**

**PAC REFERENCE NUMBER: NW-114:**

- 1. References:** Please include the specifics of the IM/IRA approval letter August, 2004 as discussed in the NFA Recommendation section.

**PAC REFERENCE NUMBER: NW-170:**

- 1. Historical Summary:** As previously agreed, please provide maximum concentrations of soil COCs for Division comparison to current WRW ALs.
- 2. PAC (or IHSS) Investigations:** Please include this heading then indicate why accelerated action sampling was not conducted.
- 3. References:** Please include the specifics of the approval letter of September 26, 2002 as discussed in the NFA Recommendation section.

**PAC REFERENCE NUMBER: NW-174a:**

- 1. References:** Please include the specifics of the approval letter of October 7, 2003 as discussed in the NFA Recommendation section.

**PAC REFERENCE NUMBER: NW-174b:**

- 1. IHSS Investigations:** As previously agreed, please provide maximum concentrations of soil COCs for Division comparison to current WRW ALs. The second paragraph of the section suggests that a VOC was detected but below the Tier I subsurface soil value.

2. In the second paragraph of the section, modify "Als" to "ALs".
3. **References:** Please include the specifics of the approval letter of July 7, 1999 as discussed in the NFA Recommendation section.

**PAC REFERENCE NUMBER: NW-195:**

1. **References:** Please include the specifics of the approval letter of October 28, 1994 as discussed in the NFA Recommendation section.

**PAC REFERENCE NUMBER: NW-203:**

1. **IHSS Investigations:** In the third paragraph of the section, modify "Als" to "ALs".
2. **References:** Please include the specifics of the approval letter of July 9, 1999 as discussed in the NFA Recommendation section.

**PAC REFERENCE NUMBER: NW-1500:**

1. **PAC Investigations:** Please conclude from the statement, and the fact that the soil was immediately removed, that accelerated action sampling was not warranted.
2. **References:** Please include the specifics of the approval letter of July 9, 1999 as discussed in the NFA Recommendation section.

**PAC REFERENCE NUMBER: NW-1501:**

1. **References:** Please include the specifics of the approval letter of June 23, 2003 as discussed in the NFA Recommendation section.

**PAC REFERENCE NUMBER: NW-1502:**

1. **PAC Investigation:** Include the fact that the soil was immediately as a basis that accelerated action sampling was not warranted.
2. **References:** Please include the specifics of the approval letter of February 14, 2002 as discussed in the NFA Recommendation section

**PAC REFERENCE NUMBER: NW-1503:**

1. **PAC Investigations:** Include also include, in this section, the fact that the soil was immediately as a basis that accelerated action sampling was not warranted.
2. **References:** Please include the specifics of the approval letter of February 14, 2002 as discussed in the NFA Recommendation section

**PAC REFERENCE NUMBER: NW-1504:**

1. **PAC Investigations:** Please provide a more specific basis, in this section, for not sampling soils.

2. **References:** Please include the specifics of the approval letter of September 26, 2002 as discussed in the NFA Recommendation section.

**PAC REFERENCE NUMBER: NW-1505:**

1. **PAC Investigations:** In the third paragraph of the section, modify "Als" to "ALs".
2. Please briefly state the basis for the consultative decision regarding arsenic.

**EPA Comments  
HRR 2005  
Northwest Area  
August 2005**

**August 25, 2005**

Specific Comments

1. **PAC Reference Number: NW-114, page 3, fifth paragraph.** This paragraph discusses contaminant concentrations in upgradient wells. The next paragraph discusses concentrations in both upgradient and downgradient wells, with the next paragraph (on page 4) discussing concentrations in downgradient wells. For easier readability, please discuss all upgradient wells in one paragraph and all downgradient wells in another paragraph.
2. **PAC Reference Number: NW-114, page 4, third paragraph.** The last sentence states, "The IM/IRA was approved by the Regulatory Agencies in August 2004." Should this date be 2005? If so, please correct this discrepancy.
3. **PAC Reference Number: NW-170, page 7, fifth paragraph.** Please briefly describe how the vanadium concentrations were discovered (what study).
4. **PAC Reference Number: NW-170, No Further Action Recommendation, first sentence.** The sentence construction is awkward. Please revise. Also, in the same paragraph, please identify the regulatory agency (s) that approved the NFAA on September 26, 2002.
5. **PAC Reference Number: NW-195, No Further Action Recommendation.** Please identify the regulatory agency (s) that approved the NFA on October 28, 1994.
6. **PAC Reference Number: NW-1502.** This PAC is not identified on the associated map. Please add the location to the associated figure.
7. **NW Area Figure.** Two locations that are represented on the map are not discussed in the text (000-501 and 168). Please remove from the map or add discussion in the text.

Required Distribution:

Additional Distribution:

