

## Raynes, Scott

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**From:** DiSalvo, Rick  
**Sent:** Monday, June 22, 2009 5:19 PM  
**To:** 'Carl.spreng@state.co.us'  
**Subject:** Draft CR 2009-02 Xcel excavation  
**Attachments:** CR 2009-02 Attachment1 Project Description.pdf; RFLMA CR 2009 02 Draft.doc

Hi Carl, here is the draft CR and Attachment 1 for your review and approval. As usual, we will add your approval date (make any changes needed for approval), remove Draft from header and post on website.

This is going through our tech edit process, but as we discussed, I wanted to let you have a look at this and comment now hopefully before you have to leave town - we will need to finish tech edit before we can post to website. I don't think anything substantive will come out of tech edit, but I'll send you the edited version as soon as I get it back.

Thanks!

## Memorandum

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**Subject:** Excavation Permit for Valve Replacement on Xcel 12" Golden Pipeline

**Date:** May 18, 2009

**To:** Scott Surovchak

**From:** David Cloutier, Olsson Associates (consultant for Xcel)

**Background:** On Monday April 20, 2009 representatives of Xcel Energy (Xcel) met with representatives of the Rocks Flats Site (RFS) to discuss the permitting requirements for an upcoming valve replacement project that Xcel must complete on the 12-inch Golden Pipeline where it crosses through the Central Operable Unit at the RFS. This area of RFS is subject to Institutional Controls (IC). IC requirements include the prohibition of soil disturbing activities except in accordance with an approved Erosion Control Plan and prohibition of excavations deeper than three feet unless approved by CDPHE. This memorandum, and the attached figures, provides the RFS management team with pertinent information regarding the excavation and erosion control best management practices to request approval for the valve replacement project. A description of the project is provided below.

1. The construction activities for the valve replacement project are scheduled to start on or about July 6, 2009 and are expected to be completed in one week. The excavation of the pipeline will occur in sequences so that the entire pipeline will not be exposed at one time and the amount of disruption of access along the road way will be reduced.
2. The construction site is shown on Figure 1 (attached).
3. The pipeline is reportedly buried at a depth of approximately six feet below ground surface (bgs). It is expected that the excavation would be less than six feet wide and the base of the excavation would be less than 10 feet bgs. Trench boxes would be used to stabilize the side walls of the trench and minimize the area of disturbance.
4. The construction activities for the valve replacement will require the excavation of approximately 226 feet of the 12-inch Golden Pipeline so that the malfunctioning valve and an existing pipeline casing can be removed. A temporary bypass pipeline will be installed around the valve to maintain service while the construction activities are underway. The pipeline will be cut on either side of the valve assembly, the malfunctioning valve will be removed, the section of pipeline that contains the valve will be routed above ground, the new valve will be installed (above ground), and the underground portion of the pipeline will be buried. The casing around the pipeline will be removed while the excavation is open and the pipeline is exposed.
5. Erosion control best management practices (BMPs) will include the following:
  - Snow fence will be installed around the perimeter of the work area as shown of Figure 2 to limit the area of disturbance by restricting traffic to the work area.

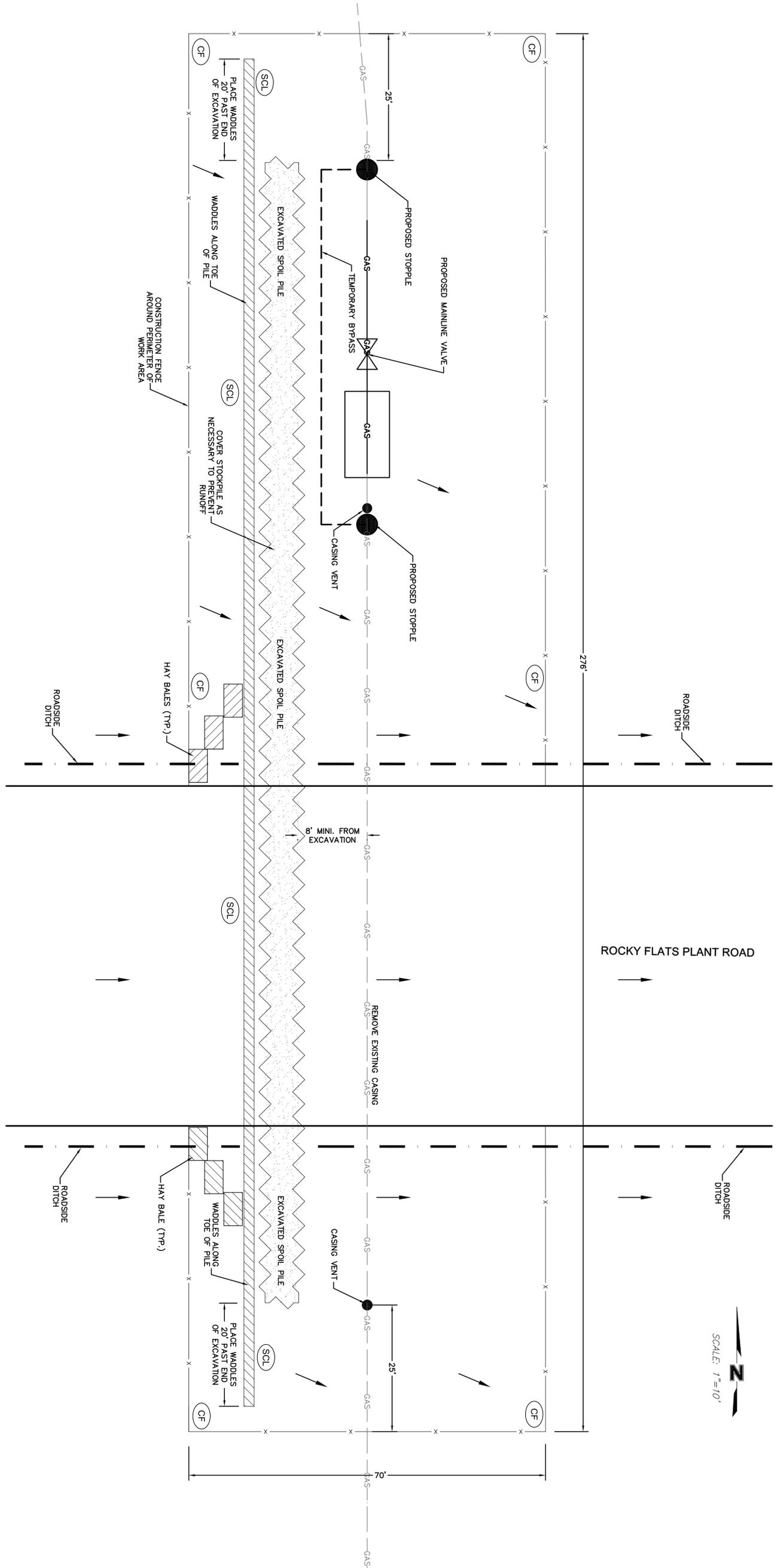
- The soil that is removed from the excavation to expose the pipe and valve will be placed in a soil pile (furrow) along the west side of the trench. The soil pile will be located at least eight feet back from the edge of the excavation.
- The excavated soil pile will be covered as necessary to prevent windblown soil or run off.
- Straw waddles will be placed along the toe of the west side of the excavated soil pile to prevent runoff from contacting the soil.
- Where the trench crosses the road and roadside ditch, straw bales and/or waddles will be used as necessary to divert potential drainage to the north or south of the work area and to reduce the velocity of the flow.
- Any leaks, spills, or drips will be cleaned up immediately and managed appropriately.

#### **Contact Information for this project**

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- 1) Xcel Energy  
Eric Sweeney  
303-571-3323
- 2) Pipeline Strategies, Inc.  
Mike Humberd  
719-520-9279
- 3) Olsson Associates, Inc.  
David Cloutier  
303-237-2072





NOTE:  
 DRAINAGE ON SITE FLOWS FROM WEST TO EAST WITH A 0.9 FOOT DROP IN ELEVATION.

- LEGEND**
- GAS —
  - X —
  - 12" EXISTING PIPELINE
  - 12" PROPOSED PIPELINE ROUTE AND VALVE SET
  - SPOIL PILE
  - SEDIMENT CONTROL LOG
  - DIRECTION OF FLOW
  - HAY BALES

REV. NO.	DATE	REVISIONS

**UNCC**  
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MAINLINE VALVE REPLACEMENT		2009
12-INCH GOLDEN PIPELINE		
COLORADO		

drawn by: RBG  
 checked by: NH  
 approved by: DC  
 QA/QC by: DC  
 project no.: 05-11-09  
 drawing no.: 05-11-09

**ROCKY FLATS SITE  
REGULATORY CONTACT RECORD**

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**Purpose:** Excavation by Xcel Energy for Valve Replacement on 12-inch Golden Pipeline

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**Contact Record Approval Date:**

**Site Contact(s) / Affiliation(s):** Scott Surovchak, DOE; John Boylan, S.M. Stoller; Linda Kaiser, S.M. Stoller; Jeremiah McLaughlin, S.M. Stoller; Rick DiSalvo, S.M. Stoller

**Regulatory Contact(s) / Affiliation(s):** Carl Spreng, CDPHE

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**Discussion:** Xcel Energy operates a natural gas line located within a utility easement located in the Central Operable Unit (COU). Most of this natural gas line is beneath the ground surface. A valve station is located near the eastern boundary of the COU. The valve equipment will be replaced by Xcel Energy and/or its subcontractors (collectively, Xcel). The project description information is included in Attachment 1 to this Contact Record and was provided by Xcel's consultant. Xcel will perform the work and DOE will provide access to the work area in accordance with the utility easement. Rocky Flats personnel will not be involved directly in the work, but will remain cognizant of the work and coordinate with Xcel to resolve any issues during performance of the work.

CDPHE and Site personnel informally consulted regarding this work on May 14, 2009.

The excavation involves actions prohibited by the institutional controls (ICs) incorporated in the Rocky Flats Legacy Management Agreement (RFLMA). The excavation work is a soil disturbance and will also exceed the 3-foot-depth limit prohibited by ICs. (RFLMA, Attachment 2, Table 4, Control 2) and thus requires pre-approved procedures.

The objective of IC 2 regarding excavations with a depth that exceeds 3 feet is to maintain the current depth to subsurface contamination or contaminated structures. This IC also results in achieving compliance with the CDPHE risk management policy of ensuring that residual risks to the site user are at or below  $1 \times 10^{-6}$ . As discussed further, below, the proposed work achieves the risk management policy goal.

The excavated area will be backfilled with the excavated materials, and the elevations will approximate the preconstruction elevations. We do not anticipate that any excess excavated soils will remain after completion of the work. However, any excess soils may be used for minor fill or revegetation use at other appropriate locations on site.

Excel Energy has agreed to implement the best management practices in the *Erosion Control Plan for Rocky Flats Property Central Operable Unit, DOE-LM/1497-2007* (ECP) to provide erosion controls for the excavated materials so that run-on and runoff will be minimized. In addition, the disturbed area will be reseeded and final erosion controls (e.g., erosion matting) installed and maintained until ECP revegetation success criteria are met.

**DRAFT**

CDPHE has requested that the following information be included in contact records for soil excavation:

*1 - Provide information about any remaining subsurface structures in the vicinity so that the minimum cover assumption won't be violated (or state that there are none if that is the case)-*

There are no remaining subsurface structures in the work area, other than the aforementioned natural gas line.

*2 - Provide information about any former IHSSs/PACs or other known soil or groundwater contamination in the vicinity (or state that there is no known contamination)-*

The excavation area is not in any former IHSS/PACs. This excavation area is within the Windblown Area Exposure Unit (WBEU), which was evaluated in the *RCRA Facility Investigation-Remedial Investigation/Corrective Measures Study-Feasibility Study Report for the Rocky Flats Environmental Technology Site*, Appendix A, Comprehensive Risk Assessment, Volume 9 (CRA). Arsenic and plutonium 239/240 were identified as residual surface soil contaminants of concern for the WBEU. The East Trenches Plume exists in groundwater in this vicinity, but excavation will not extend to a depth that would intercept groundwater. The exposure scenarios evaluated in the CRA included excavation for maintenance purposes and incidental contact with groundwater, and based on the CRA there would be no significant risk from excavation in this area.

*3 - Resurvey any new surface established in subsurface soil, unless sufficient existing data is available to characterize the surface (or state that the excavated soil will be replaced and the original contours restored)*

It is anticipated that all excavated soils will be returned to the excavation as previously discussed, and original contours will be restored.

**Closeout of Contact Record:** This contact record will be closed when the excavations are backfilled and when seeding for revegetation and revegetation erosion controls, as needed, are completed.

**Resolution:** Carl Spreng, CDPHE, approved the excavation work as described in this contact record.

**Contact Record Prepared by:** Rick DiSalvo

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**Distribution:**

Carl Spreng, CDPHE  
Scott Surovchak, DOE  
Linda Kaiser, S.M. Stoller  
Rocky Flats Contact Record File