Raynes, Scott (CONTR)

From: Spreng, Carl <Carl.Spreng@dphe.state.co.us>
Sent: Friday, July 08, 2011 10:51 AM
To: DiSalvo, Rick (CONTR); Vera Moritz
Cc: Surovchak, Scott; Kaiser, Linda (CONTR); Darr, Bob (CONTR)
Subject: RE: Draft Contact Record 2011-04

Rick,

I agree with your assessment. This CR documents our consultation and lays out a path forward for an evaluation - all according to the RFLMA process. There may be instances in the future where we may want to allow AMP input before making a RFLMA decision, but I don't think this is one of those instances.

I approve CR 2011-04 with Vera's concurrence.

Carl

-----Original Message-----
From: DiSalvo, Rick (CONTR) [mailto:Rick.DiSalvo@lm.doe.gov]
Sent: Friday, July 08, 2011 10:44 AM
To: Spreng, Carl; Vera Moritz
Cc: Surovchak, Scott; Kaiser, Linda (CONTR); Darr, Bob (CONTR)
Subject: RE: Draft Contact Record 2011-04

Carl, very good question. I have not confirmed directly with Scott on this, but I believe his intention is to get CR's posted and notify stakeholders ASAP after approval. If you could send approval now, we can begin the posting process, which takes a few days anyway. When Scott is back on Monday can confer.

Here is my understanding of Scott's direction based on all our conversations during development of the AMP.

The AMP makes clear that the RFLMA process takes precedence. Now that we also have AMP group conversation piece, and difficulty in setting up mutually agreeable meeting times, etc., it is best not to wait for the AMP group input before informing public of what we are doing to address condition. We would factor in AMP group feedback when timely enough to inform the RFLMA consultative process.

If DOE agrees to items based on AMP cooperative approach, those can be done under AMP and not necessarily under RFLMA. If RFLMA Parties believe an AMP group (or anyone in public) suggestion should be part of the RFLMA action plan, then I think that would be done by additional CR or formal correspondence, such as the evaluation progress reporting in quarterly or annual reports.

Thanks!

-----Original Message-----
From: Spreng, Carl [mailto:Carl.Spreng@dphe.state.co.us]
Sent: Friday, July 08, 2011 9:49 AM
To: DiSalvo, Rick (CONTR); Vera Moritz
Cc: Surovchak, Scott; Kaiser, Linda (CONTR)
Subject: RE: Draft Contact Record 2011-04

OK with me. Do you intend to post this as approved before next week's meeting - or wait to hear input from the AMP process?

Carl

-----Original Message-----
From: DiSalvo, Rick (CONTR) [mailto:Rick.DiSalvo@lm.doe.gov]
Sent: Friday, July 08, 2011 8:47 AM
To: Spreng, Carl; Vera Moritz
Cc: Surovchak, Scott; Kaiser, Linda (CONTR)
Subject: RE: Draft Contact Record 2011-04

Carl and Vera, I incorporated Vera's changes and Carl's changes, except I incorporated one of Carl's suggested revised bullets in his email below slightly
diefferently:

Carl's suggested bullet - * Measured concentrations of uranium at
GS10 include both naturally-occurring as well as anthropogenic uranium.
Historically, naturally-occurring uranium has made up a much greater proportion of the groundwater - generally about 70 percent.

It's GS10 that shows about 70% natural - the upgradient well is all natural (the details are included in the Plan and Schedule section bullets). So, I revised the bullet as follows:

* The groundwater in the GS10 area has high concentrations of
naturally occurring uranium as well as lower concentrations of anthropogenic uranium. Measured concentrations of uranium at GS10 include both naturally-occurring as well as anthropogenic uranium.
Historically, naturally-occurring uranium has made up a much greater proportion of the concentration at GS10 - generally about 70 percent.

Attached is clean version of the Drfat CR with the suggested changes incorporated for approval. Please let me know if this is acceptable or other chnages are needed before approval.

Thanks

-----Original Message-----
From: Spreng, Carl [mailto:Carl.Spreng@dphe.state.co.us]
Sent: Tuesday, July 05, 2011 1:26 PM
To: Vera Moritz; DiSalvo, Rick (CONTR)
Subject: RE: Draft Contact Record 2011-04

Rick,

I agree with Vera's suggestions. Here's a couple of others:

1. I'd suggest breaking the first bullet at the bottom of page 1 into 2 points. And I'd state the new second bullet more definitively by deleting "generally associated with".

* Measured concentrations of uranium at GS10 include both

naturally-occurring as well as anthropogenic uranium. Historically, naturally-occurring uranium has made up a much greater proportion of the groundwater - generally about 70 percent.
* In recent years, the elevated uranium concentrations at GS10
are a result of proportionally increased groundwater contribution to surface water baseflow due to reduced surface runoff resulting from the removal of impervious surfaces (e.g., pavement, buildings) during site closure. In addition to the general increase in groundwater contribution to the stream, the below-normal precipitation from the late fall of 2010 until mid-May 2011 resulted in a further proportional increase in groundwater contribution.

2. In the (current) second bullet, I'd modify the 4th sentence: "Thus, the ranges in activity...."

3. In the third bullet, I'd add to the second sentence for clarity:
"The current 12-month....."

When the evaluation is written, it might be helpful to identify the potential sources of anthropogenic U.

Carl

-----Original Message-----
From: Vera Moritz [mailto:Moritz.Vera@epamail.epa.gov]
Sent: Tuesday, July 05, 2011 12:49 PM
To: DiSalvo, Rick (CONTR)
Cc: Spreng, Carl
Subject: Re: Draft Contact Record 2011-04

Rick - couple suggestions -

1 -Right after "this contact record documents...consultation on June 16,
2011":

Insert a sentence stating "The RFLMA parties agreed on the evaluation steps described below, and agreed that no mitigating actions are necessary while the condition is being evaluated..."

2 - move the 3rd bullet, which states "other monitoring indicates the remedy remains protective" to be the 1st bullet. Suggest clarifying this "other monitoring" is actually "downstream monitoring."

Otherwise, this CR looks good - I'm OK to concur - thanks - Vera