

Raynes, Scott (CONTR)

From: DiSalvo, Rick (CONTR)
Sent: Thursday, October 13, 2011 5:19 PM
To: carl.spreng@state.co.us; 'Moritz.Vera@epamail.epa.gov'
Cc: Surovchak, Scott; Hooten, Gwen; Darr, Bob (CONTR); Kaiser, Linda (CONTR)
Subject: Draft Contact Record 2011-06 Roads upgrade project
Attachments: DRAFT Contact Record 2011-06 101311.DOC

Attached is the draft contact record for your review and approval.

This is the first CR that has a Soil Disturbance Review Plan pursuant to the recent CAD/ROD amendment and RFLMA Attachment 2 modification.

After your approval, with changes incorporated as necessary for approval, the CR will be posted to the Rocky Flats website and notification to stakeholders of the posting made.

If approved, we would like to do the work the week of 11/7/11, and as you know, under the RFLMA Attachment 2 modification, we will not start the work until 10 days after the CR has been posted and notification made.

Please let me know if you have any questions or need further information regarding the Draft CR.

Thank you

ROCKY FLATS SITE REGULATORY CONTACT RECORD

Purpose: Soil Disturbance Review Plan - Roads upgrade project involving reconfiguration of a sharp curve west of Functional Channel 1

Contact Record Approval Date:

Site Contact(s)/Affiliation(s): Gwen Hooten, U.S. Department of Energy (DOE); Rick DiSalvo, S.M. Stoller Corporation (Stoller); Linda Kaiser, Stoller

Regulatory Contact(s)/Affiliation(s): Carl Spreng, Colorado Department of Public Health and Environment (CDPHE)

Discussion: Maintenance, repair, and upgrades to the gravel road west of Functional Channel 1 within the Central Operable Unit are planned for early November 2011. The upgrades will include reconfiguring a sharp curve in the road south of North Walnut Creek. A drawing showing the topography of the existing roadway curve and the planned reconfiguration for the work is provided in Attachment 1, Soil Disturbance Review Plan.

The reconfiguration will be accomplished by excavating soil and grading soil on the west side of the current curve deeper than 3 feet below the surface. The excavation and grading will not return the area to its preexisting elevation. Therefore this work is subject to the Rocky Flats Legacy Management Agreement (RFLMA), Attachment 2, Institutional Controls (ICs) 2 and 3, which are provided in the following table.

IC 2	Excavation, drilling, and other intrusive activities below a depth of three feet are prohibited, without prior regulatory review and approval pursuant to the Soil Disturbance Review Plan in RFLMA Attachment 2.
	<p>Objective: Prevent unacceptable exposure to residual subsurface contamination.</p> <p>Rationale: Contaminated structures, such as building basements, exist in certain areas of the Central OU, and the Comprehensive Risk Assessment did not evaluate the risks posed by exposure to this residual contamination. Thus, this restriction eliminates the possibility of unacceptable exposures. Additionally, it prevents damage to subsurface engineered components of the remedy.</p>
IC 3	No grading, excavation, digging, tilling, or other disturbance of any kind of surface soils is permitted, except in accordance with an erosion control plan (including Surface Water Protection Plans submitted to EPA under the Clean Water Act) approved by CDPHE or EPA. Soil disturbance that will not restore the soil surface to preexisting grade or higher may not be performed without prior regulatory review and approval pursuant to the Soil Disturbance Review Plan in RFLMA Attachment 2.
	<p>Objective: Prevent migration of residual surface soil contamination to surface water.</p> <p>Rationale: Certain surface soil contaminants, notably plutonium-239/240, were identified in the fate and transport evaluation in the Remedial Investigation as having complete pathways to surface water if disturbed. This restriction minimizes the possibility of such disturbance and resultant impacts to surface water. Restoring the soil surface to preexisting grade maintains the current depth to subsurface contamination or contaminated structures.</p>

The required Soil Disturbance Review Plan is in Attachment 1. The RFLMA parties consulted regarding the information in the Soil Disturbance Review Plan on October 4, 2011.

CDPHE has reviewed information regarding the proposed soil disturbance and excavation and, after consultation with EPA, CDPHE has approved the proposed activity. CDPHE has determined that the proposed activity will not result in an unacceptable release or exposure to residual subsurface contamination, and will not damage any component of the remedy. CDPHE has also determined that the proposed project meets the rationale and objectives of IC 2 and IC 3.

DOE will not conduct the approved soil disturbance and excavation until 10 calendar days after this contact record is posted on the Rocky Flats website and notification of the posting is made to stakeholders in accordance with the RFLMA Public Involvement Plan.

Closeout of Contact Record: This contact record will be closed when the work is completed, post-construction reseeding has been performed, and erosion controls are in place.

Resolution: Carl Spreng, CDPHE, approved the soil disturbance and excavation work described in the Soil Disturbance Review Plan.

Contact Record Prepared by: Rick DiSalvo

Distribution:

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

Attachment 1

Rocky Flats Legacy Management Agreement (RFLMA) Soil Disturbance Review Plan

Proposed Project: Roads upgrade project involving reconfiguration of a sharp curve west of Functional Channel 1

This Soil Disturbance Review Plan provides information required by RFLMA Attachment 2, Legacy Management Requirements, Section 4.1, regarding the work proposed by the U.S. Department of Energy (DOE).

Description of the proposed project, including the purpose, the location, and the lateral and vertical extent of excavation.

The purpose of the project is to maintain and improve the section of gravel road shown in Figure 1. The improvement regrades the area and takes out a sharp curve that is on the edge of a sloping embankment to result in wider radius curve that is farther away from the sloping embankment. The planned location, lateral and vertical extent, and grade upon completion of the work are shown in Figure 1. The excavation for regrading this portion of the road will be approximately 6 feet deep at the deepest portion.

Information about any remaining subsurface structures in the vicinity of the proposed project.

There are no remaining subsurface structures in the vicinity of the proposed project.

Information about any former Individual Hazardous Substance Sites, Potential Areas of Concern, or other known or potential soil or groundwater contamination in the vicinity of the proposed project.

This area of the gravel road is in former PAC 000-501, "Roadway Spraying."

PAC 000-501 included portions of gravel roads that were intermittently sprayed with waste oils, footer drain water with tracer test dye, and reverse osmosis treatment system brine from January 1974 to September 1983.

The characterization and disposition of this PAC is summarized in the *RCRA Facility Investigation—Remedial Investigation/ Corrective Measures Study—Feasibility Study Report for the Rocky Flats Environmental Technology Site (RI/FS)*, Appendix B, "FY2005 Final Historical Release Report." A finding of No Further Action was approved for this PAC by the Colorado Department of Public Health and Environment (CDPHE) and the U.S. Environmental Protection Agency (EPA) on February 14, 2002.

This characterization information is sufficient for DOE to implement appropriate worker health and safety controls for the soil disturbance. Disturbed soils will be regraded in the work area as shown in Figure 1.

The potential for soil migration during and after construction work will be mitigated by implementation of the CDPHE- and EPA-approved *Erosion Control Plan for Rocky Flats Property Central Operable Unit*, DOE-LM/1497-2007, July 2007 (ECP). The ECP includes requirements for stormwater control best management practices and revegetation.

The work will not intercept the water table, and effects on surface water runoff will be negligible.

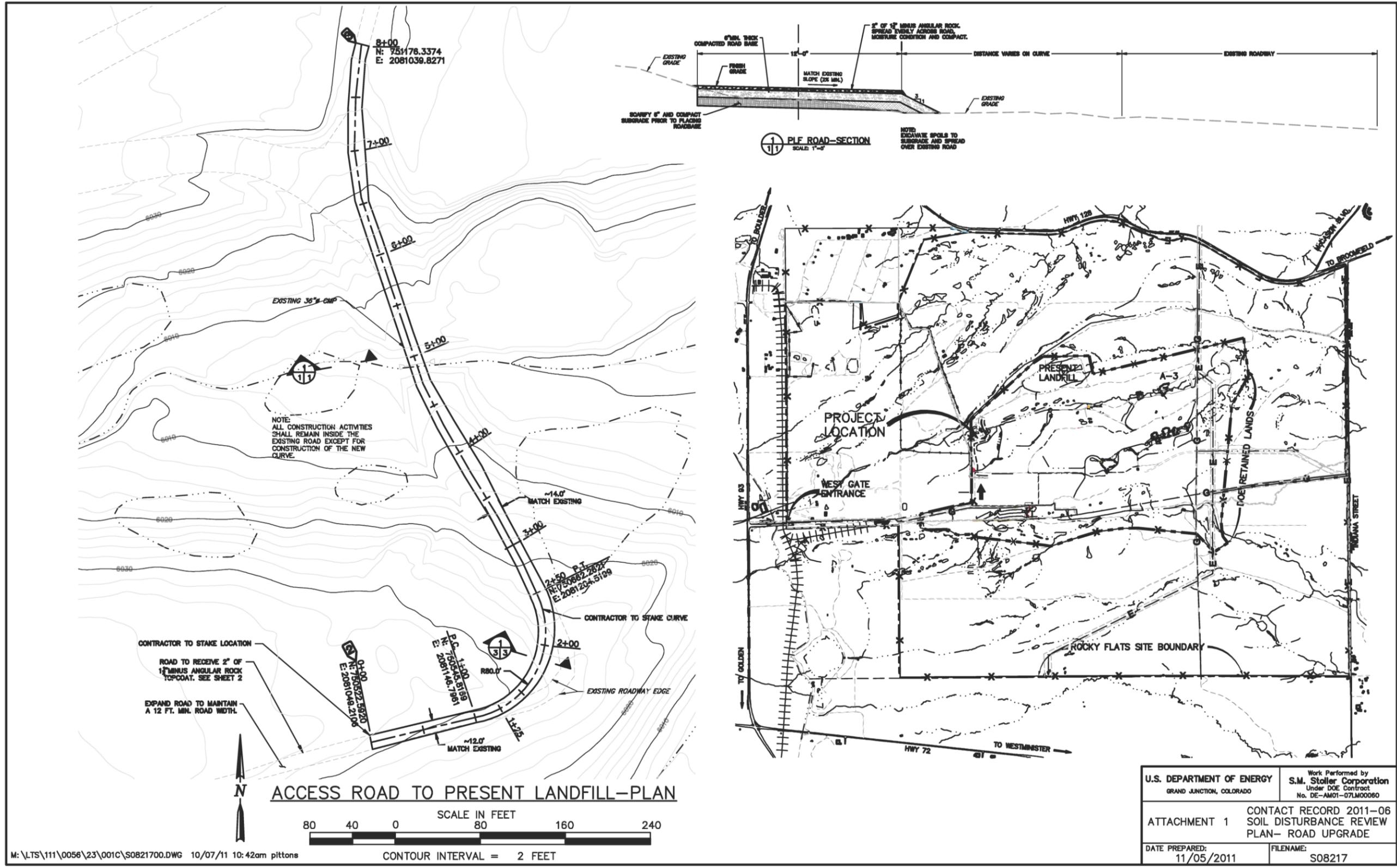


Figure 1. Project Location and Extent of Excavation