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**To:** ["Carl Spreng \(carl.spreng@state.co.us\)"](mailto:Carl.Spreng@state.co.us)  
**Cc:** ["Vera Moritz"](mailto:Vera.Moritz); ["Scott Surovchak \(scott.surovchak@lm.doe.gov\)"](mailto:Scott.Surovchak@lm.doe.gov); [Kaiser, Linda \(CONTR\)](mailto:Kaiser.Linda)  
**Subject:** DRAFT RFLMA CR 2015-02 Soil Disturbance Review Plan for Shed PV Upgrades  
**Date:** Tuesday, March 31, 2015 11:03:00 AM  
**Attachments:** [image001.png](#)  
[RFLMA CR 2015-02 Soil Disturbance Review Plan for Shed PV Upgrades\\_jle\\_jeesrs04-done.doc](#)  
[Figure 1 S1279500\\_je01-done.pdf](#)

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Hi Carl,

On behalf of Scott, I am transmitting the attached Draft Contact Record 2015-02 for your review, approval, approval with comments or disapproval. We are scheduled to start the drilling of the holes for the supports on May 1, 2015, therefore I would like to have this Contact Record posted and the public notice issued the week starting April 13, 2015.

Upon approval, after incorporating any changes required for approval, we will add the approval date, remove "DRAFT" from the footer and watermark, change the tense of the Resolution section from present to past ("will approve, approve with modification or disapprove" to "has approved"; "will determine if" to "has determined that" and "will also determine if" to "has also determined that", post to the public website and send the email notification to stakeholders.

If you have any questions please call me.

Thanks

David Ward

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# ROCKY FLATS SITE REGULATORY CONTACT RECORD 2015-02

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**Purpose:** Soil Disturbance Review Plan (SDRP) for Storage Shed Photovoltaic Upgrades

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**Contact Record Approval Date:**

**Site Contact(s)/Affiliation(s):** Scott Surovchak, U.S. Department of Energy (DOE); Kurt Franzen, Linda Kaiser, David Ward, Stoller Newport News Nuclear, Inc. (SN3), a wholly owned subsidiary of Huntington Ingalls Industries, Inc.

**Regulatory Contact(s)/Affiliation(s):** Carl Spreng, Colorado Department of Public Health and Environment (CDPHE); Vera Moritz, U.S. Environmental Protection Agency (EPA)

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**Introduction:** This Contact Record concerns proposed upgrades to a storage shed that was constructed around 2001 at the Rocky Flats, Colorado, Site. The shed is on a concrete slab floor, with structural steel wall frames and roof trusses, rigid sidewall, and galvanized metal roofing and siding. A photovoltaic (PV) system at the storage shed provides power to operate overhead garage-doors motors and small LED emergency lights. The PV system operates with an inverter.

**Discussion:** The storage shed photovoltaic upgrade project is designed to provide sufficient additional power at the shed to power the existing overhead garage doors, the existing LED lighting, and additional powered hand tools. The existing system shall be evaluated for reusing as much of the existing equipment as possible. The required new PV panels will rest on six supports, including the one existing support. The new supports will require five 12-inch diameter holes drilled approximately 3 feet deep. The holes will be filled with concrete. The supports will be in an 8-foot by 10-foot (approximate) array with the existing support on the east side of the array.

The soil disturbance that occurs during the excavation of the five holes for the support of the new PV panels is subject to the requirements of certain *Rocky Flats Legacy Management Agreement* (RFLMA) institutional controls (ICs), as discussed below. An approved SDRP is required and the RFLMA parties agree that Figure 1 provides sufficient information for the SDRP for the proposed work.

**Institutional Controls Evaluation:** The soil disturbance work is subject to IC 2. Table 1 recaps this IC.

Table 1. Institutional Controls

Controls	Use Restrictions
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.
	<b>Objective:</b> Prevent unacceptable exposure to residual subsurface contamination. <b>Rationale:</b> Contaminated structures, such as building basements, exist in certain areas of the Central Operating Unit, 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.

The required SDRP is in Attachment 1.

**Resolution:** CDPHE, after reviewing information regarding the proposed soil disturbance and excavation and after consultation with EPA, will approve, approve with modification, or disapprove the proposed activity. CDPHE will determine whether the proposed activity: (1) will not compromise or impair the function of the remedy or (2) will result in an unacceptable release or exposure to residual subsurface contamination. CDPHE will also determine whether the proposed project meets the rationale and objectives of IC 2.

The work will be conducted after CDPHE's approval, but DOE will not conduct the approved soil disturbance until 10 calendar days after this Contact Record is posted on the Rocky Flats site's website and stakeholders are notified of the posting in accordance with the RFLMA Public Involvement Plan. The work is planned to be conducted and completed in the spring of 2015.

Information regarding the drilling of these support footings will be reported in quarterly reports, annual reports, or both, depending on when the activities occur.

**Closeout of Contact Record:** This contact record will be closed when the new supports are installed, the excavation is backfilled, and any revegetation and erosion controls are in place.

**Contact Record Prepared by:** David Ward

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**Distribution:**

Carl Spreng, CDPHE  
Scott Surovchak, DOE  
Vera Moritz, EPA  
Linda Kaiser, SN3  
Rocky Flats Contact Record File

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

**Proposed Project:** SDRP for Storage Shed Photovoltaic Upgrades

This SDRP provides information required by RFLMA Attachment 2, “Legacy Management Requirements,” Section 4.1, “Soil Disturbance Review Plan,” regarding the work proposed by DOE.

*(1) 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 provide additional power to a storage shed (formerly known as building 920B) for operating additional hand tools. Additional photovoltaic (PV) panels are required to provide the additional power.

Five holes, 12-inches in diameter and approximately 3 feet deep, will be drilled and filled with concrete. The additional PV panels will be supported by the new concrete footings. Figure 1 in Contact Record 2015-02 shows the approximate location of the new supports.

*(2) Information about any remaining subsurface structures in the vicinity of the proposed project.*

The shed was a vehicle inspection building (formerly known as building 920B) for the east gate. There are no subsurface structures in the vicinity of this project.

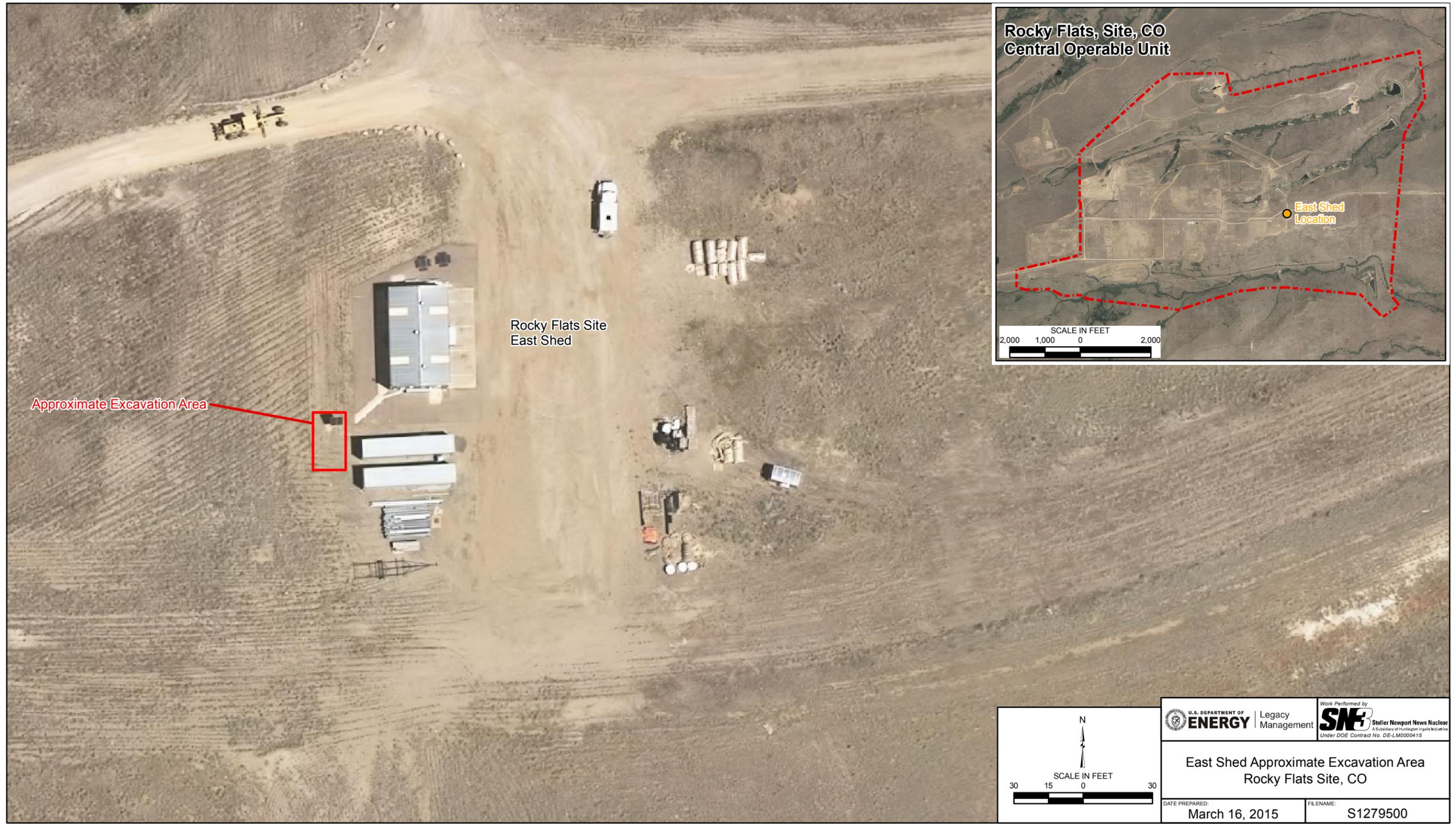
*(3) Information about any former Individual Hazardous Substance Sites (IHSSs), Potential Areas of Concern (PACs), or other known or potential soil or groundwater contamination in the vicinity of the proposed project.*

No IHSSs were identified in the project area.

*(4) 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).*

The holes will be filled with concrete and the surrounding surface will be returned to the existing grade. Therefore, the original contours will be restored.

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Figure 1. Location of Excavation for Storage Shed PV Upgrades Project