Appendix B

Example Contact Record

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ROCKY FLATS SITE
REGULATORY CONTACT RECORD

Purpose: Soil Disturbance Review Plan—Roads maintenance, including grading the road to the former A-3 Pond to convert the road to two-track vehicle use.

Contact Record Approval Date: May 31, 2012

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

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

Date of Consultation Meeting: May 24, 2012

Consultation Meeting Participants: Carl Spreng, CDPHE; Scott Surovchak, DOE; Rick DiSalvo, Stoller

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Discussion: Routine maintenance and minor repairs to portions of the Central Operable Unit (OU) gravel roads are planned for mid-June 2012. As part of the project, the gravel road that leads to the former A-3 Pond will be converted from a truck access road to a two-track vehicle (e.g., an all-terrain vehicle) access road.

The dams for Pond A-3 and the Present Landfill (PLF) were breached as described in Contact Record 2011-07, "Soil Disturbance Review Plan—Pond A-3 and Present Landfill (PLF) Pond Dam Breach Project." A truck-access gravel road will be maintained for the PLF area for inspection, monitoring, and maintenance of the PLF cover and the Present Landfill Seep Treatment System, but a two-track access road is all that is needed in the former A-3 Pond area for access to North Walnut Creek monitoring locations. That existing gravel road will be converted to a two-track road and will be revegetated and designated for two-track vehicle use. A portion of this road (on the hillside slope leading south to the former A-3 Pond) that was built up to accommodate trucks will be regraded to promote revegetation, to accommodate precipitation runoff, and to minimize the potential for erosion. The regrading will involve excavation deeper than 3 feet below the existing grade, and the surface will not be returned to the preexisting grade.

Two other gravel road sections that have centerline humps will be regraded to remove approximately 6 inches of soil that form the humps. This cut soil will be filled and graded into the road. This regrading will not return the surface of the centerline humps to the preexisting grade or higher.

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.
	Objective: Prevent unacceptable exposure to residual subsurface contamination. **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.
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.
	Objective: Prevent migration of residual surface soil contamination to surface water. **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.

The required Soil Disturbance Review Plan is in Attachment 1. Figures 1 and 2 show the location of the areas to be graded described above.

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 erosion controls are in place, and seeding for revegetation has been performed.

Resolution: Carl Spreng, CDPHE, approved the soil disturbance and excavation work described in the Soil Disturbance Review Plan (Attachment 1).

Contact Record Prepared by: Rick DiSalvo

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

RFLMA Contact Record 2012-01

Draft CR 2012-01 Attachment 1

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

Proposed Project: Roads maintenance, including grading the road to the former A-3 Pond to convert the road to two-track vehicle use.

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).

For clarity in this Soil Disturbance Review Plan, the areas under discussion are identified on Figure 1 as Locations 1 and 2 (gravel road sections where centerline humps will be removed) and Location 3 (a gravel road that will be regraded and revegetated for two-track vehicle use). The locations are as follows:

- **Location 1:** Gravel road access to the Solar Ponds Plume Treatment System Interceptor Trench System collection sump and related equipment and the SPOUT sampling location.
- **Location 2:** Gravel road access from the east face of Pond A-4 Dam to the WALPOC sampling location.
- **Location 3:** Gravel road access from the south-facing hillside to the former Pond A-3 and Surface Water Configuration Adaptive Management Plan sampling location GS12.

<u>Description of the proposed project, including the purpose, the location, and the lateral and vertical extent of excavation.</u>

The purpose of the project is to perform routine maintenance of gravel roads and to revegetate and regrade a section of existing gravel road to convert it to two-track vehicle use. The work locations are shown in Figures 1 and 2. The maintenance will include removing approximately 6 inches of soil that form the centerline humps in the gravel roads at Locations 1 and 2 that could pose a vehicle safety hazard if not removed, and grading the removed material into the low spots adjacent to the humps. The gravel road in Location 3 was previously graded to accommodate truck use. One portion, on a hillside, has a horizontal "bench" profile that entails precipitation runoff and erosion control maintenance requirements. The removed soils will be placed and graded within the gravel road footprint. Regrading to remove the "bench" profile and revegetation will accommodate two-track vehicle use and improve the runoff characteristics in this area, thus minimizing the erosion potential and the need for erosion controls when the vegetation is established.

The planned location, lateral and vertical extent, and grade upon completion of the work are as described above and shown in Figures 1 and 2.

<u>Information about any remaining subsurface structures in the vicinity of the proposed project.</u>

There are no remaining subsurface structures in the vicinity of Locations 1, 2 or 3.

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

Location 1: This location is not in the vicinity of any former IHSSs or PACs, but it is in the eastern area of the extent of the Solar Pond Plume (SPP), as shown on RFLMA Attachment 2, "Legacy Management Requirements," Figure 2, "Composite Plume Map." The SPP contains nitrate and uranium contamination at levels above RFLMA surface water standards, which are based on Colorado drinking water supply standards.

This road maintenance work will not involve any soil disturbance that would result in contact with groundwater that may be associated with the SPP.

Location 2: This location is just east of former IHSS 142.4—Pond A-4, and is not in any former IHSS or PAC.

Location 3: This location is just north of former IHSS 142.3—Pond A-3, and is not in any former IHSS or PAC.

As part of the *RCRA Facility Investigation—Remedial Investigation/Corrective Measures Study—Feasibility Study Report for the Rocky Flats Environmental Technology Site* (RI/FS), Exposure Units (EUs) were evaluated and documented in Appendix A of the RI/FS, "Comprehensive Risk Assessment" (CRA). Locations 1, 2, and 3 are in the Upper Walnut Drainage EU.

The results of the CRA for the Upper Walnut Drainage EU are in Volume 7 of Appendix A. Benzo(a)pyrene was identified as the only contaminant of concern (COC) for surface soil/surface sediment in this EU. No COCs were identified for subsurface soil. Benzo(a)pyrene was not directly associated with any Rocky Flats site historical source areas but could be associated with vehicle traffic, paving, or pavement degradation prior to closure. The calculated lifetime excess cancer risk for the surface exposure scenario for the wildlife refuge worker for benzo(a)pyrene in the CRA is 1×10^{-6}.

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 shown in Figure 1 and Figure 2.

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. For Locations 1 and 2, which will remain gravel roads, changes to surface water runoff will be negligible. For Location 3, revegetation and regrading are expected to reduce impacts of runoff.

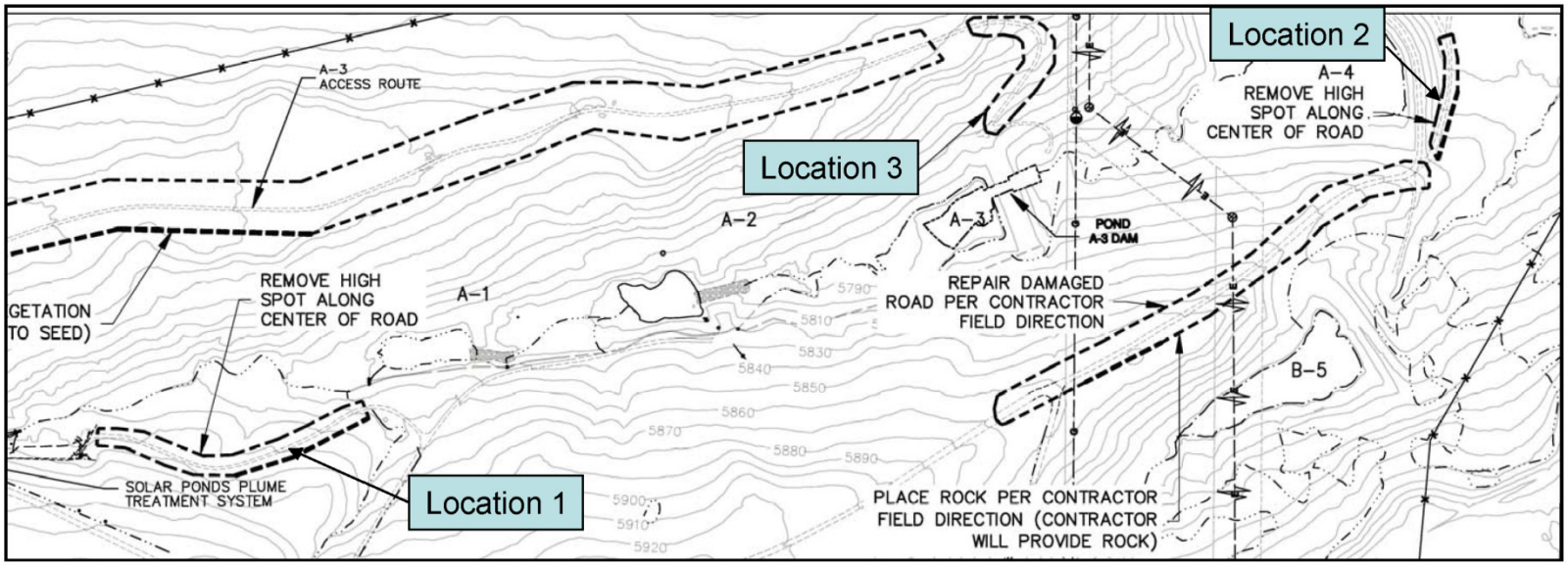

Figure 1. Road Maintenance Locations

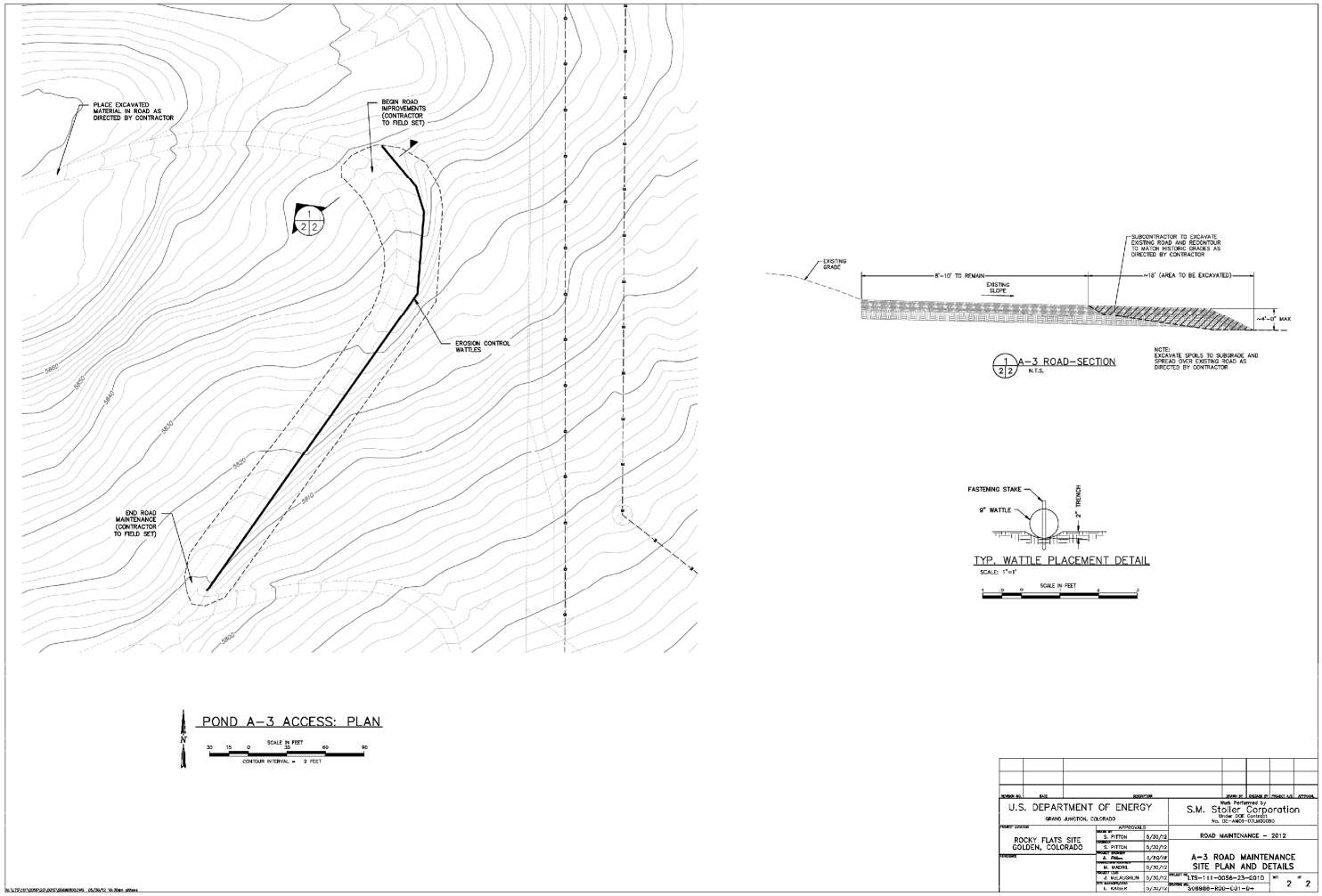

Figure 2. Road to Former Pond A-3