

**ROCKY FLATS SITE
REGULATORY CONTACT RECORD**

Purpose: Installation of snow fencing north of the Original Landfill (OLF) and approval of work after closeout of Contact Record.

Contact Record Approval Date: October 16, 2009

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

Discussion: Snow fencing will be installed north of the OLF to minimize snow drifting that could cause snow and ice to build up on the OLF cover, as discussed during consultation regarding the OLF geotechnical investigation work (refer to RFLMA Contact Record 2008-07).

The snow-fence design includes nine sections of snow fence, with H-bracing on the ends of each section and fencing T-posts spaced between the H-braces. Each H-brace has two wood posts, each 4 inches in diameter. To place each post, a hole (1 foot in diameter) must be drilled, the post must be put in it, and the rest of the hole must be filled with post mix. T-posts are installed using a post driver.

Attachment 1 shows the planned location of each section of fencing in relation to the OLF waste footprint outline. The OLF has a soil cover at least 2 feet thick over the waste footprint. The southern ends of snow fence sections 7 through 9 are over the waste footprint.

The H-braces within the OLF waste footprint will be installed to a depth of not more than 2 feet below the surface, to stay within the OLF soil cover material depth. The H-braces outside the OLF waste footprint will be installed to a depth of approximately 3 feet below the surface. The T-posts inside and outside the OLF waste footprint will be installed to a depth of approximately 2 feet.

The construction involves excavation prohibited by the institutional controls (ICs) incorporated into the Rocky Flats Legacy Management Agreement (RFLMA). The post holes for the H-braces outside the OLF waste footprint may slightly exceed the 3-foot-depth limit specified by ICs (RFLMA, Attachment 2, Table 4, IC 2), and drilling, excavation, and construction on the cover of the OLF is prohibited, except for remedy-related purposes (RFLMA, Attachment 2, Table 4, IC 6). Thus, CDPHE must approve the planned excavations and snow-fence construction on the cover of the OLF.

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 1×10^{-6} . As discussed in the information involving soil excavation below, the proposed work achieves the objective and risk management policy goal.

The objective of IC 6 is to ensure the proper functioning of the landfill cover. Minimizing snow and ice buildup on the cover, as discussed in RFLMA Contact Record 2008-07, is consistent with this objective.

Soils removed from the post holes will be spread in the area of the holes to blend in with the surrounding soils and minimize the impact on existing vegetation. The best management practices in the July 2007 *Erosion Control Plan for Rocky Flats Property Central Operable Unit* (DOE-LM/1497-2007) will also be considered if erosion controls for the excavated materials or construction work are deemed necessary.

CDPHE has requested that the following information be included in Contact Records that involve 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 vicinity, so minimum cover assumptions will not be violated. A buried Xcel Energy natural gas line is located in the snow fence area north of the OLF. Utility locates will be done, and the location of the gas line will be marked prior to soil disturbance.

2 - Provide information about any former Individual Hazardous Substance Sites (IHSSs)/Potential Areas of Concern or other known soil or groundwater contamination in the vicinity (or state that there is no known contamination).

This OLF is former IHSS 115. The construction will take place in the 2-foot soil cover material in the OLF waste footprint, and will not impact the OLF waste.

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).

The final ground contours will approximate the pre-excavation contours. Excess soils generated from the excavation will be spread in with the surrounding soils.

Closeout of Contact Record: This Contact Record will be closed when the construction is completed.

The RFLMA Parties agreed, as documented in RFLMA Contact Record 2007-08, that the status of actions or activities in RFLMA Contact Records will be documented by DOE from time to time, and included in RFLMA quarterly or annual surveillance and maintenance reports for tracking purposes. The RFLMA Parties also agreed that to facilitate status reporting, Contact Records should include a short discussion of the anticipated actions or activities to close out the RFLMA Contact Record. Thus, RFLMA Contact Record 2007-08 and subsequent Contact Records now include the closeout discussion. However, under certain situations, activities previously approved in a Contact Record that has been closed out will need to be performed. For example, the snow fence posts will need to be maintained by replacing broken, bent or rotted posts and realigning the fence after heavy snow or wind. A simple notification and approval process has been developed for these situations, as described below.

After this Contract Record is closed out, snow fence maintenance activities may be performed in accordance with it, after CDPHE has been notified of and approves the activities. The notification and approval may take place over the phone or in person, and followed up with an e-mail.

Similarly, CDPHE may approve activities previously covered by Contact Records that have been closed, even if the work was otherwise prohibited by ICs. CDPHE may receive notification of and approve the activities over the phone or in person, with e-mail follow-ups. The notification and approval of such work shall be reported in the next RFLMA annual report, in relation to the Contact Record that originally covered the work. This protocol is consistent with RFLMA paragraph 34.

Resolution: The installation of the snow fence is approved as described in this Contact Record. The protocol for providing notification of, and approving, work for activities previously covered under other Contact Records is also approved.

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Rocky Flats Contact Record

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