

**ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE
ER REGULATORY CONTACT RECORD**

Date/Time: July 21, 2005 / 10:00 a.m.

Site Contact(s): K-H Karen Wiemelt, Susan Serreze

Phone: 303-692-2035 – CDPHE
303/312-6312 - EPA
303/966-4226 – DOE

Agency: CDPHE: Harlen Ainscough
EPA: Sam Garcia, Larry Kimmel, Todd Bechtel
DOE: Norma Castañeda

Purpose of Contact: A meeting was held on July 21, 2005 to discuss the PICs HRR Write ups and the 600, 100, and 300 Area HRR Write ups.

Discussion: See meeting minutes below.

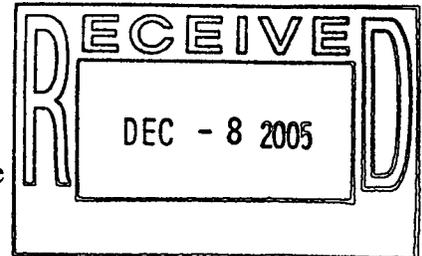
Contact Record Prepared By: Susan Serreze

**July 21, 2005 Comment Resolution Meetings
For
PICS HRR Write ups
600 Area HRR Write ups
100 Area HRR Write ups
300 Area HRR Write ups**

A meeting was held on July 21, 2005 to discuss the PICs HRR Write ups and the 600, 100, and 300 Area HRR Write ups.

Attendees

DOE: Norma Castaneda
CDPHE: Harlen Ainscough
EPA: Sam Garcia, Larry Kimmel, Todd Bechtel (Greystone)
K-H Team: Karen Wiemelt, Nick Demos, Carla Rellegert, Susan Serreze



II. Report Status

Issues

ADMIN RECORD

BL
12

No Sitewide issues were discussed.

Specific Comments

PICS HRR Write up

The attached written comments were received from CDPHE and EPA. The following resolutions were agreed to:

- MSDS information will be added if appropriate.
- The reason for the NFAA will be added.
- PICs will reference the IHSS or PAC that they are associated with (if necessary).
- All PICs will be checked for consistency.
- All other comments will be addressed.

600 Area HRR Write up

The attached written comments were received from CDPHE and EPA. The following resolutions were agreed to:

All comments will be addressed. No further discussion was needed.

100 Area HRR Write up

The attached written comments were received from EPA. The following resolutions were agreed to:

All comments will be addressed. No further discussion was needed

300 Area HRR Write up

The attached written comments were received from EPA. The following resolutions were agreed to:

All comments will be addressed. No further discussion was needed.

Other Issues

There were no other issues for discussion.

V. Meetings

The next meeting will held on August 4 , 2005 at 10:00 AM in the Breckenridge Room.

Colorado Department of Public Health and Environment
Hazardous Materials & Waste Management Division

Comments

Draft

PIC REFERENCE NUMBERS:

1-61

Comprehensive

Historical Release Report

2005

Specific Comments:

PIC 1:

- 1. No Further Action Recommendation:** Please be specific. State that the September letter approved NFA, the term then in use, for the PIC. Please consider this comment to be global for all 61 PICs, as necessary. A brief summary of the relative toxic properties, etc. of hydraulic oil, from a MSDS, would be insightful and reassuring for the public.

PIC 4 (6, 9, 11, 14, 15, 17, 18, 41, 42, 44, 47 & 57):

- 2. References:** The date of April 15, 2004 is the date of the PIC recommendation report. The approval of the document occurred on April 30, 2004 as correctly indicated in the No Further Action Recommendation section. Accordingly, the reference to the CDPHE concurrence, rather than the document, must also include the date of April 30, 2004. This comment has been made during prior reviews of individual PIC documents, please address.

PIC 5:

- 3. General:** The map *Approximate Locations of Potential Incidents of Concern* states that insufficient information is known to locate PIC 5 and several other PICs. However, since Building 729 is a known location, it would be appropriate to place a "5" over Building 729, perhaps in an italic font, and explain it in the legend. This comment should be considered for any similar occurrences.
- 4.** The MSDS and IRIS information provided in the PIC 11 document would be a useful addition to PIC 5.

PIC 6:

- 5. Historical Summary:** Reference to CDPHE should be changed to CDH. In the last sentence of the section change "oil" to "fuel".

PIC 7:

- 6. No Further Action Recommendation:** A brief summary of the relative toxic properties, etc. of hydraulic oil, from a MSDS, would be insightful and reassuring for the public.

PIC 13:

- 7. No Further Action Recommendation:** A brief summary of the relative toxic properties, etc. of compressor oil, from a MSDS, would be insightful and reassuring for the public.

PIC 17:

- 8. PIC Investigations:** Please include the approval date of the Sanitary Sewer System (PAC 000-500) NFAA, March 21, 2005, and include it in the references.

PIC 27:

- 9. No Further Action Recommendation:** A brief summary of the relative toxic properties, etc. of hydraulic fluid (oil), from a MSDS, would be insightful and reassuring for the public.

PIC 28:

- 10. No Further Action Recommendation:** A brief summary of the relative toxic properties, etc. of compressor oil, from a MSDS, would be insightful and reassuring for the public.

PIC 30, 31, 32:

- 11. No Further Action Recommendation:** A brief summary of the relative toxic properties, etc. of hydraulic oil) from a MSDS, would be insightful and reassuring for the public.

PIC 37:

- 12. General:** PICs 2, 10, and 33, all gasoline spills, would benefit from the discussion of benzene included in the discussion of PIC 37.

EPA Comments

HRR 2005

Potential Incidents of Concern

July 2005

General Comment

The second sentence of the *No Further Action Recommendation* section for each PIC states, "Based on these discussions, agreement was reached that an NFA was justified because the spill is believed to have been cleaned up, the spill was not a reportable quantity, and the spill was very likely to asphalt, concrete, or another man-made surface and did not adversely impact soil or water." This statement is used very generously and insinuates that all of these conditions were met for each PIC, which is not the case. This statement should be made more specific as to the exact disposition of the spill or release and clearly state the reason for NFA. Specific examples include the following PICs:

- PIC 16 (page 32) - The Historical Summary section states picric acid was burned in a pit. None of the reasons stated above for NFA were met, with the possible exception of "not a reportable quantity". The reason for NFA should be clearly stated.
- PIC 26 (page 52) - The Historical Summary section states the spill was to soil, the spill was contained and cleaned up. This same statement should be made in the No Further Action section rather than the templated statement above.
- PIC 27 (page 54) - The Historical Summary section states the spill was to gravel, the spill was contained and cleaned up. This same statement should be made in the No Further Action section rather than the templated statement above.
- PIC 30 (page 60) - The Historical Summary section states the spill was to the soil, was roughly one gallon, and the spill was cleaned up. This same statement should be made in the No Further Action section rather than the templated statement above.
- PIC 37 (page 75) - The Historical Summary section states the spill was to a ditch, the spill was contained and cleaned up. This same statement should be made in the No Further Action section rather than the templated statement above.
- PIC 40 (page 81) - The Historical Summary section states the spill was to the ground and was cleaned up. This same statement should be made in the No Further Action section rather than the templated statement above.

Clearly state the reason or reasons for an NFA justification rather than using a statement that is design to meet every scenario.

Colorado Department of Public Health and Environment

Hazardous Materials & Waste Management Division

Comments

Draft

PAC 600s

Comprehensive

Historical Release Report

2005

Specific Comments:

PAC REFERENCE NUMBER: 600-120.2:

- 1. PAC Investigations:** On the first page, please reference the RFCA Tier II Soil AL version, i.e., 1996, 2000, or 2003. Although “significantly less than RFCA Tier II Soil”(e.g., an Open Space Tier II of 69.8 pCi/g for Pu239/240) implies that the WRW AL of 50 pCi/g has been met, providing maximum detections for each of the named constituents consistent with PAC 600-117.3 and 600-152, is appropriate.
- 2.** On the second page, please find and delete the artifact “II” that follows RFCA WRW.
- 3. No Further Action Recommendation:** In the first bullet, please find and delete the artifact “II” that follows “RFCA WRW”.

PAC REFERENCE NUMBER 600-152:

- 1. Historical Summary:** It appears that IHSS 153 has been used, erroneously, twice in place of IHSS 152. The HRR Area 600 map shows that 152 overlaps with 117.3. Please address.
- 2. No Further Action Recommendation:** Only one IHSS, in this context, “was” recommended for NFA.

PAC REFERENCE NUMBER 600-160:

- 1. PAC Investigations:** Providing maximum detections for each of the named constituents consistent with PAC 600-117.3 and 600-152, is appropriate. Since accelerated action closeout was based on the 2003 version of RFCA Attachment 5, please compare the VOC concentrations to the 2003, not 2000, WRW ALs.
- 2.** SS441294 should be deleted in the second paragraph since it is adequately discussed in the first and fourth paragraphs of the section and was not an accelerated action, but historic, occurrence.
- 3.** Clarification is needed in the fourth paragraph of the section. Please state the depth interval to indicate the applicability of the WRW AL 3x provision to “subsurface” soil, i.e., up to three feet in depth.

PAC REFERENCE NUMBER 600-161:

- 1. PAC Investigations:** Providing maximum detections for all of the named constituents consistent with PAC 600-117.3 and 600-152, would be appreciated. (Unlike some PAC narratives and the Pu/Am values, comparisons of the uranium isotopes and metals were to the 2003 version of RFCA Attachment 5 and activity levels/concentrations are provided in the DSR. The comparison of organics to detection limits, in this instance, is adequate)

PAC REFERENCE NUMBER 600-189:

- 1. PAC Investigations:** Providing maximum detections for each of the named constituents consistent with PAC 600-117.3 and 600-152, is appropriate.

PAC REFERENCE NUMBER 600-1003:

- 1. PAC Investigations:** In the second sentence of the second page, edit to “collected”. In the fifth sentence edit to “Pu-239/240”.

PAC REFERENCE NUMBER 600-1004:

Historical Summary: In the first sentence, either the word “of” preceding “several” is extraneous, or text is missing between “several” and “Site and CDPHE representatives....” Please address

EPA Comments

HRR 2005

Area 600

July 2005

General Comment

Due to the fact that many acronyms are used in every PAC, PIC, and Area write-up, please include an all-inclusive acronym list at the beginning of the completed 2005 Historical Release Report.

Specific Comments

1. **PAC Reference Number: 600-1001, page 2, PAC Investigation section, second paragraph.** This paragraph states that only two confirmation samples were collected. Please include a short discussion as to why only two were collected.
2. **PAC Reference Number: 600-1003, Page 1, Historical Summary section.** Remove extra period after first sentence, change EG&E to read EG&G, and insert a space in the second to last sentence between "the" and "2004".
3. **PAC Reference Number: 600-117.3, Dates of Operation or Occurrence.** The date of operation is currently 1955 – 1996, however, the Historical Summary section states that the area was used for chemical storage until 1966. Please correct this discrepancy, if necessary.
4. **PAC Reference Number: 600-152, Dates of Operation or Occurrence.** The date of operation is currently 1955 – 1996, however, the Historical Summary section states that the area was used for chemical storage until 1966. Please correct this discrepancy, if necessary.

EPA Comments
HRR 2005
100 Areas
May 2005

1. **PAC Reference Number 100-600, No Further Action Recommendations.** This paragraph states, "NFA was justified for PAC 100-600 because the spill was cleaned up." Also state that analytical results for samples collected justifies an NFA.
2. **PAC Reference Number 100-601, PAC Investigations.** This paragraph states, "...actions included immediate disposal of the remaining phosphoric acid." Please include a discussion as to the recommendations and final disposition of acid contaminated soil. The NFA was based on the disposal of the remaining acid, however, there is no discussion on the acid that was spilled on the ground.
3. **PAC Reference Number 100-603, Page 1, last sentence.** Please remove the stray "0".
4. **PAC Reference Number: 100-609.** This PAC has not been included on its associated figure. Please correct this oversight. Additionally, please consider including only those PACs that are discussed in the text. In this particular case, 100-602 could be removed from the map.
5. **PAC Reference Number 100-612, Historical Summary.** The last two sentences in this paragraph are unclear. Was a total of six quarts or three quarts of battery solution spilled? These sentences should be consolidated into one sentence.

HRR 2005
300 Areas
May 2005

1. **PAC Reference Numbers: 300-134N and 300-134S, Page 1, Historical Summary, second paragraph.** Please remove the stray "900" that appears towards the end of the paragraph.
2. **PAC Reference Number 300-151, page 1, last paragraph.** Please make the units of volume consistent. Use either gallons or liters, but not both.
3. **PAC Reference Number 300-151, page 2, No Further Action Recommendation.** The second sentence should be restructured.
4. **PAC Reference Number 300-171, page 3, No Further Action Recommendation.** Please change the word "required" to "justified" for the NFA.
5. **PAC Reference Number 300-181, page 2, References.** Please consider combining all references into one section.
6. **PAC Reference Number 300-186, page 3, No Further Action Recommendation.** Please change the word "required" to "justified" for the NFA.
7. **PAC Reference Number 300-206, page 2, References.** Please consider combining all references into one section.
8. **PAC Reference Number 300-703, page 1, Historical Summary, first sentence.** This sentence states, "PAC 300-703 is located north of Building 331, as shown on Figure The PAC 300-703 area overlaps with IHSS 134N." According to the associated figure, it appears that this PAC overlaps with IHSS 135S instead of 134N.
9. **Figure XX for Area 300, IHSSs, PACs, and UBCs.** Please consider including only those PACs that are discussed in the 300 Area text. In this particular case, 500-908, 500-907, and 000-501 could be removed from the map.

