Raynes, Scott

From: Kaiser, Linda
Sent: Tuesday, August 11, 2009 9:11 AM
To: Carl Spreng
Cc: Surovchak, Scott; DiSalvo, Rick; McLaughlin, Jeremiah
Subject: Contact record for upcoming roads project
Attachments: RFLMA CR 2009-03 DRAFT 080509.DOC

Carl, here is the contact record for the upcoming roads project that we plan to start next week. Please review and let me know if you approve, or call with questions.

Thanks!
Linda

ROCKY FLATS SITE
REGULATORY CONTACT RECORD

Purpose: Soil disturbance for road maintenance and improvement work involving the construction of roadside drainage ditches that will not return excavation to preexisting grade.

Contact Record Approval Date:

Site Contact(s)/Affiliation(s): Jeremiah McLaughlin, S.M. Stoller; Rick DiSalvo, S.M. Stoller

Regulatory Contact(s)/Affiliation(s): Carl Spreng, CDPHE

Discussion Maintenance, repair and upgrades to certain portions of gravel roads within the Central Operable Unit are planned for mid- to late August, 2009. Upgrades will include installing/repairing shallow drainage ditches along some portions for better precipitation run on and run off controls. These ditches are the same basic design as ditches approved under Contact record 2007-04 for the Phase III road repair/maintenance work conducted in August 2007.

One existing drainage ditch along the road bordering the east side of the Original Landfill east diversion channel (S-curve) will be extended and a new drainage ditch will be constructed along the south side of road to the Solar Ponds Plume Treatment System. When they are completed, the center of the ditches will be 1 foot below the existing grade with an approximately 3:1 taper up to the existing grade. The ditches will be lined with permanent erosion matting and the disturbed area will be reseeded.

The Rocky Flats Legacy Management Agreement (RFLMA), Attachment 2, Table 4, Institutional Control (IC) Number 3, stipulates that soil disturbance must be in accordance with the CDPHE-approved Erosion Control Plan (ECP) and that the soil surface must be restored to the preexisting grade after any soil-disturbance activity has occurred. Work will be done in accordance with the ECP, but of necessity, soil will not be restored to the preexisting grade where the ditches are to be constructed.

The ditches are needed to meet the design objective to facilitate drainage, and the construction is a field modification. DOE may implement field modifications that are consistent with the intent of the approved action (in this case, IC Number 3) upon approval by CDPHE, in accordance with RFLMA, paragraph 34. This contact record is to document CDPHE approval.

The objective of the IC 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 1x10-6. Based on a review of the areas where ditches are to be constructed, and based on the limited aerial extent, the minor change in depth to subsurface contamination does not impact meeting the risk management policy.

CDPHE has requested that the following information be included in contact records for soil excavation related to this IC that will not return soil to the preexisting grade:

1) Provide information about any remaining subsurface structures in the vicinity so that the minimum cover assumption will not be violated (or state that there are none if that is the case).

None of the areas where ditches are planned to be constructed have remaining subsurface structures in the vicinity of the planned ditches.

2) Provide information about any former IHSSs/PACs or other known soil or ground water contamination in the vicinity (or state that there is no known contamination).

There is no known soil or ground water contamination in the vicinity of the planned ditches.

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).

When completed, the center of the ditches will be 1 foot below the existing grade with a 3:1 taper up to the existing grade.

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

Resolution

Carl Spreng, CDPHE, approved the placement of the ditches as described in this contact record.

Contact Record Prepared by: Jeremiah McLaughlin and Rick DiSalvo

---

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