

ROCKY FLATS SITE REGULATORY CONTACT RECORD

Purpose: Resource Conservation and Recovery Act (RCRA) Well Monitoring Results at Original Landfill (OLF) and Present Landfill (PLF)

Contact Record Approval Date: April 25, 2011

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

Discussion: Groundwater monitoring results were reviewed in accordance with Rocky Flats Legacy Management Agreement (RFLMA) requirements and for the preparation of the 2010 RFLMA Annual Report. The results of statistical evaluations of analytical data from the OLF and PLF RCRA wells required consultation among the RFLMA Parties. This contact record documents the specific results driving the need for consultation. More detailed information will be provided in the 2010 Annual Report.

The RFLMA decision flowchart for RCRA wells at the OLF and PLF is presented in Figure 10 of Attachment 2 to the RFLMA. The following summary describes conditions that require consultation to determine an appropriate response. These conditions were discussed in a consultation meeting on March 31, 2010.

OLF

1. Downgradient groundwater contains statistically significant higher concentrations of a constituent included in RFLMA Table 1 than are present in upgradient groundwater, *OR*
2. Trending calculations indicate a constituent in downgradient groundwater at the OLF is on a statistically significant increasing trend.

PLF

1. Downgradient groundwater contains statistically significant higher concentrations of a constituent included in RFLMA Table 1 than are present in upgradient groundwater, *AND* trending calculations indicate a constituent in downgradient groundwater at the PLF is on a statistically significant increasing trend.

Analytical data from the RCRA wells at each landfill was evaluated using the analysis of variance (ANOVA) approach to determine if downgradient concentrations significantly exceeded upgradient concentrations; and using the Seasonal Kendall trending method to assess whether any constituents are on a statistically significant increasing trend.

OLF

At the OLF, the result of corresponding evaluation condition number 1 above is true for 2010: the groundwater results for all three downgradient wells indicate a statistically significant higher

concentration of boron (B) is present in downgradient than upgradient groundwater. The same applies to uranium (U) in downgradient groundwater monitored at well 80205, the easternmost of the three downgradient wells. The concentration of B is below the RFLMA Table 1 standard and the concentration of U is below the RFLMA groundwater threshold value. Furthermore, the U in this well has been characterized as 100% natural U by Los Alamos National Laboratory using Thermal Ionization Mass Spectrometry analysis.

The result for evaluation condition number 2 is not true for 2010.

The overall 2010 evaluation results for these analytes were no different than the 2009 results, which are summarized in contact record 2010-05 and the 2009 RFLMA Annual Report.

PLF

At the PLF, the result of the corresponding evaluation condition is true for 2010 for B in groundwater monitored at well 73105. The concentration of B is below the RFLMA Table 1 standard.

The overall 2010 evaluation results were no different than the 2009 results, which are summarized in contact record 2010-05 and the 2009 RFLMA Annual Report.

Resolution: The appropriate response is to continue monitoring RCRA wells in accordance with RFLMA.

The RFLMA Parties also agreed that no further contact record documentation for evaluation of these analytes at the PLF or OLF is required, and the evaluation is to be provided in subsequent RFLMA Annual Reports. After review of the RFLMA Annual Reports, the RFLMA Parties may decide that subsequent consultation regarding appropriate response is appropriate. Such consultation will be documented in a contact record.

Closeout of Contact Record: This contact record will be closed when it is posted to the Rocky Flats website.

Resolution: Carl Spreng, CDPHE, approved this contact record.

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Distribution:

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Rocky Flats Contact Record File