

From: [Ward, David \(CONTR\)](#)
To: [Sprenng - CDPHE, Carl](#)
Subject: RE: DRAFT RFLMA CR 2014-08 Provide flexibility to the flow configuration at the Solar Ponds Plume Treatment System (SPPTS) as part of the ongoing optimization effort.
Date: Thursday, July 10, 2014 2:31:00 PM
Attachments: [DRAFT RFLMA CR 2014-08 preapproval. jle.docx](#)

Carl,

Here is the revised CR. – forgot to attach it to the prior e-mail.

Sorry,

David

From: Sprenng - CDPHE, Carl [mailto:carl.sprenng@state.co.us]
Sent: Thursday, July 10, 2014 2:10 PM
To: Ward, David (CONTR)
Cc: Moritz.Vera@epa.gov; Surovchak, Scott; Kaiser, Linda (CONTR)
Subject: Re: DRAFT RFLMA CR 2014-08 Provide flexibility to the flow configuration at the Solar Ponds Plume Treatment System (SPPTS) as part of the ongoing optimization effort.

David,

Looks good to me. You might consider adding, "A hole approximately 8 feet × 8 feet and 6 feet deep will be excavated" to the Soil Disturbance Review Plan item #1. It's stated in the CR, but would be appropriate to repeat it here to fully describe the extent of the project.

Thanks,
Carl

On Thu, Jul 10, 2014 at 10:50 AM, Ward, David (CONTR) <David.Ward@lm.doe.gov> wrote:
Carl,

On behalf of Scott, I am transmitting the attached Draft Contact Record 2014-08 for your review and approval. Adding flexibility to flow configuration of the Solar Ponds Plume Treatment System is an expedited effort because of the Site's construction schedule this summer. Therefore, CR 2014-08 is out of sequence. CR 2014-07 Abandonment of Sentinel 88104 will be issued soon for your approval.

Upon approval, after incorporating any changes required for approval, we will add the approval date, remove "DRAFT" from the footer and watermark, change the tense of the Resolution section from present to past ("will approve, approve with modification or disapprove" to "has approved"; "will determine if" to "has determined that" and "will also determine if" to "has also determined that", post to the public website and send the email notification to stakeholders.

If you have any questions please call me.

Thanks

David Ward

David Ward
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[**Carl Spreng**](#)
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ROCKY FLATS SITE

REGULATORY CONTACT RECORD 2014-08

Purpose: Provide flexibility to the flow configuration at the Solar Ponds Plume Treatment System (SPPTS) as part of the ongoing optimization effort.

Contact Record Approval Date:

Site Contact(s)/Affiliation(s): Scott Surovchak, U.S. Department of Energy (DOE); John Boylan, Linda Kaiser, David Ward, The S.M. Stoller Corporation, a subsidiary of Huntington Ingalls Industries (Stoller)

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

Discussion: The ability to alter the flow configuration between treatment components will support ongoing efforts to optimize the operation and effectiveness of the SPPTS at the Rocky Flats Site, Colorado. The existing piping between the treatment components will be modified to provide the needed flow-configuration flexibility. A hole approximately 8 feet × 8 feet and 6 feet deep will be excavated to access the existing piping and allow the installation of the new piping configuration. This excavation is entirely within the footprint of the Phase II and Phase III excavations and will only disturb the fill material in that area. Once the new piping configurations are complete, the excavation will be backfilled to the original grade with the excavated material.

The soil disturbance that occurs during the excavation of existing piping is subject to the requirements of certain *Rocky Flats Legacy Management Agreement* (RFLMA) institutional controls (ICs), as discussed below. An approved Soil Disturbance Review Plan (SDRP) is required and the RFLMA parties agree that Figure 1 provides sufficient information for the SDRP for the proposed work.

Institutional Controls Evaluation: The soil disturbance work is subject to ICs 3 and 6. Table 1 recaps these ICs.

Table 1. Institutional Controls

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.
IC 6	Digging, drilling, tilling, grading, excavation, construction of any sort (including construction of any structures, paths, trails or roads), and vehicular traffic are prohibited on the covers of the Present Landfill and the Original Landfill, except for authorized response actions.
	Objective: Ensure the continued proper functioning of the landfill covers. Rationale: This restriction helps ensure the integrity of the landfill covers.

The required SDRP is in Attachment 1. The *Erosion Control Plan for Rocky Flats Property Central Operable Unit*, approved by CDPHE and EPA, provides erosion control best management practices that meet the IC 3 requirements.

Resolution: CDPHE after reviewing information regarding the proposed soil disturbance and excavation and consultation with EPA, will approve, approve with modification or disapprove the proposed activity. CDPHE will determine if the proposed activity will not compromise or impair the function of the remedy or result in an unacceptable release or exposure to residual subsurface contamination. CDPHE will also determine if the proposed project meets the rationale and objectives of ICs 3 and 6.

The work will be conducted after CDPHE's approval, but DOE will not conduct the approved soil disturbance until 10 calendar days after this contact record is posted on the Rocky Flats site's website and stakeholders are notified of the posting in accordance with the RFLMA Public Involvement Plan. The work is planned to be conducted and completed in the summer of 2014.

Information regarding this excavation and piping installation will be reported in quarterly reports, annual reports, or both, depending on when the activities occur.

Closeout of Contact Record: This contact record will be closed when the new piping is installed, the excavation is backfilled, and any revegetation and erosion controls are in place.

Contact Record Prepared by: David Ward

Distribution:

Carl Spreng, CDPHE

Scott Surovchak, DOE

Vera Moritz, EPA

Linda Kaiser, Stoller

Rocky Flats Contact Record File

DRAFT

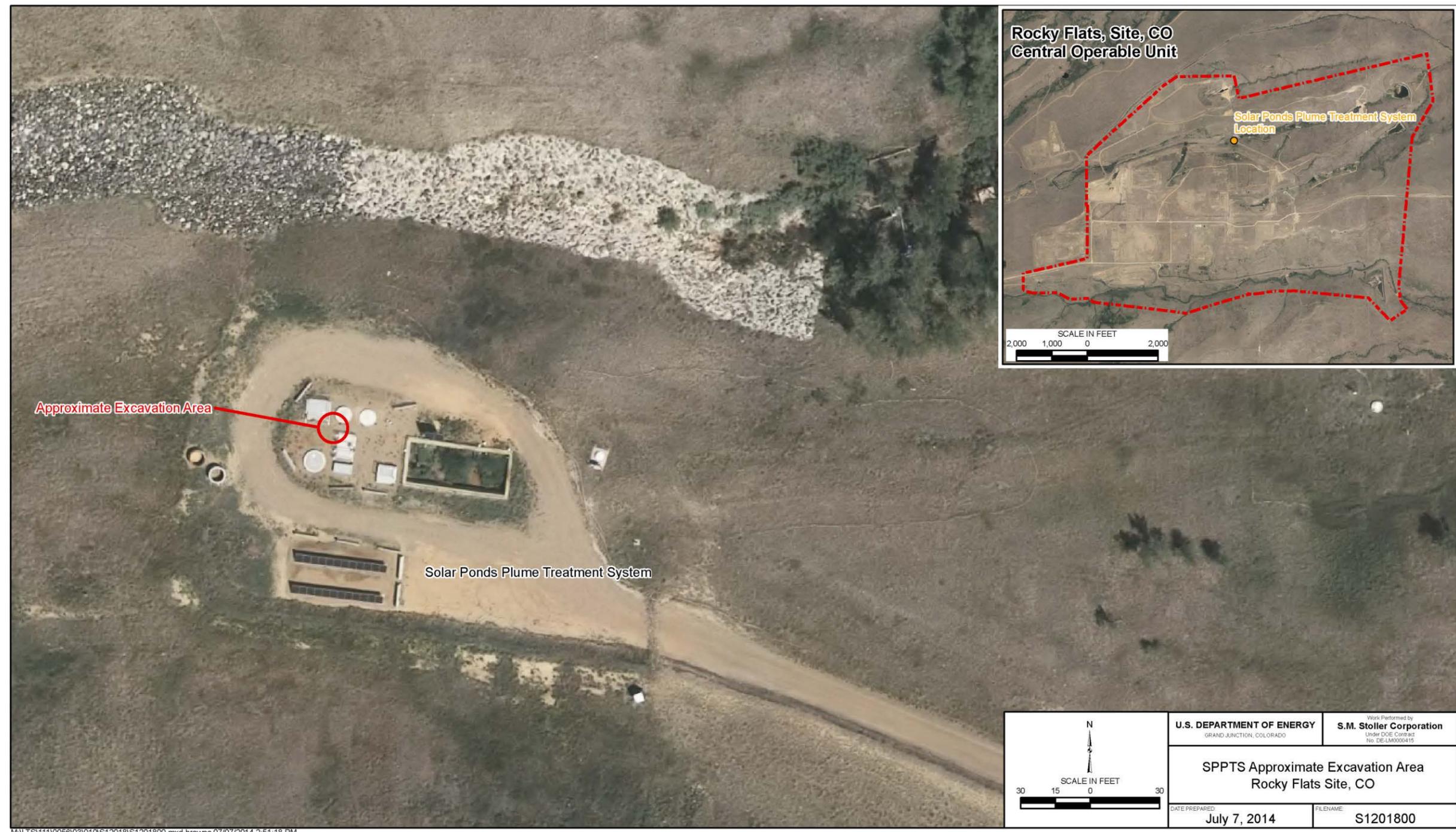


Figure 1. Location of Excavation for Piping Installation

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

Proposed Project: SDRP for providing flexibility to the flow configuration at the Solar Ponds Plume Treatment System (SPPTS) as part of the ongoing optimization effort.

This SDRP provides information required by RFLMA Attachment 2, *Legacy Management Requirements*, Section 4.1, “Soil Disturbance Review Plan,” regarding the work proposed by DOE.

1) Description of the proposed project, including the purpose, the location, and the lateral and vertical extent of excavation.

The purpose of the proposed project is to improve flexibility in the operations of the SPPTS.

A hole approximately 8 feet x 8 feet and 6 feet deep will be excavated to access the existing piping that requires modification to provide the needed flexibility. Figure 1 in Contact Record 2014-08 shows the location of the excavation and soil disturbance. This excavation is within the existing footprint and fill materials of the Phase II and Phase III upgrades to the SPPTS.

2) Information about any remaining subsurface structures in the vicinity of the proposed project.

The work is at the SPPTS. Except for SPPTS-related components, there are no other subsurface structures in the immediate vicinity.

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

The Solar Ponds Plume is upgradient of the SPPTS. There are no former IHSSs or PACs in the vicinity of the excavation area. The excavation is within fill materials from the Phase II and Phase III installations.

4) 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 the new piping configuration is installed at the SPPTS and the excavation is backfilled, the surrounding soil will be generally consistent with the existing grade.