Consultation Posting 010819

Purpose: To provide notice of a reportable condition for trichloroethene (TCE) at Area of Concern (AOC) well 10304 and document the plan and schedule to evaluate the reportable condition. On December 6, 2018, the *Rocky Flats Legacy Management Agreement* (RFLMA) parties consulted on the reportable condition and proposed response.

Concurrence Date: Concurrence with the actions specified in this notification was received via email from the Colorado Department of Public Health and Environment (CDPHE) and the U.S. Environmental Protection Agency (EPA) on January 8, 2019.

Related Contact Records: 2015-10

Description of Activity:

The RFLMA defines several categories of groundwater monitoring wells at the Rocky Flats Site. Of these, AOC wells have reportable conditions defined. AOC wells are located within a drainage and downgradient of one or more contaminant plumes and are monitored semiannually to determine whether the plume(s) may be impacting surface water quality. The primary objective of AOC well 10304 is to evaluate groundwater quality adjacent to Woman Creek, downgradient of the former 903 Pad and Ryan's Pit (Figure 1).

As documented in Contact Record 2015-10, the TCE concentration in AOC well 10304 triggered a reportable condition under RFLMA in the fourth quarter of 2015. This reportable condition lasted through the second quarter of 2017 (see Figure 1 table inset). The TCE concentration at well 10304 in the fourth quarter of 2017 was below the RFLMA Table 1 standard, ending the reportable condition for TCE that had applied since the fourth quarter of 2015. However, in the second quarter of 2018, the TCE concentration in this well was 26 micrograms per liter (µg/L), which is above the RFLMA Table 1 standard of 2.5 µg/L. As outlined in RFLMA Attachment 2, Figure 7, a reportable condition for an AOC well exists when two consecutive, routine, semiannual samples contain the same analyte at concentrations exceeding the corresponding RFLMA standard. The fourth-quarter 2018 sample collected from well 10304 showed TCE at 5.43 µg/L, which is also above the RFLMA Table 1 standard (see Figure 1 table inset). The fourth-quarter 2018 sample result represents the second consecutive semiannual result above the RFLMA standard, and, therefore, a reportable condition was triggered for AOC well 10304 at that time. In accordance with the RFLMA, within 15 days of receiving validated data defining a reportable condition, DOE must notify the agencies. Within 30 days of that date, DOE must provide a plan and schedule to the regulators for an evaluation to address the occurrence.

DOE received validated data for the fourth-quarter sample at well 10304 on December 3, 2018, and notified EPA and CDPHE of the reportable condition at a consultation meeting held on December 6, 2018. During this consultation, the parties agreed on the following plan for evaluating the reportable condition at AOC well 10304, which is the same plan the parties agreed to in CR 2015-10:

- Concurrent with the next routine RFLMA sampling of well 10304, which is scheduled to occur in the second quarter of 2019, a grab sample will be collected from surface water sample location SW10200. SW10200 is located within Woman Creek downgradient and downstream of well 10304 (Figure 1). The results of this sample will be used to evaluate the potential for volatile organic compound-contaminated groundwater to adversely affect surface water quality in this reach of Woman Creek.
- When validated results from second-quarter 2019 sampling of well 10304 and SW10200 are available, DOE will consult with EPA and CDPHE to determine if further action or evaluation to address the reportable condition is warranted.
- Grab samples will be collected from SW10200 each time AOC well 10304 is sampled until there is no longer a reportable condition for TCE at the well.

Analytical results from these samples will be included in the corresponding quarterly and annual reports.

The RFLMA parties agreed in the December 6, 2018, consultation that this notification would be used to document the reportable condition at AOC well 10304 and the plan for evaluation in lieu of a contact record. EPA and CDPHE concurrence on this notification indicates agreement with the plan and schedule to evaluate the reportable condition at AOC well 10304 as outlined above.

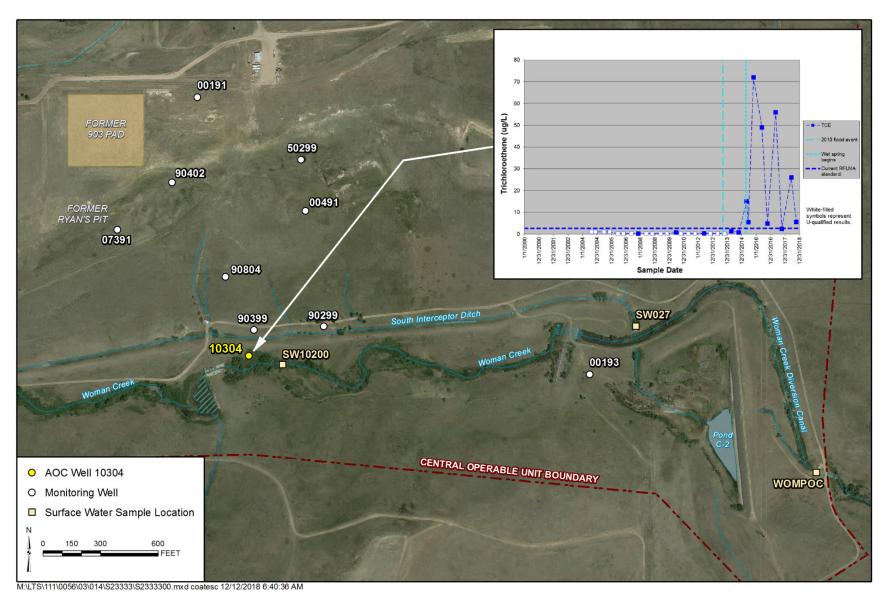


Figure 1. AOC Well 10304 Location and TCE Data