

ROCKY FLATS SITE

REGULATORY CONTACT RECORD 2025-03

Purpose: Minor modification of the *U.S. Department of Energy Rocky Flats Site Original Landfill Monitoring and Maintenance Plan* (Monitoring and Maintenance Plan): inspection frequency

Contact Record Approval Date: November 4, 2025

Site Contacts and Affiliations: Michelle Franke and Joyce Chavez, U.S. Department of Energy (DOE); Jon Vail and Ryan Wisniewski, RSI EnTech, LLC (RSI)

Regulatory Contacts and Affiliations: Brian Walker, Colorado Department of Public Health and Environment (CDPHE); Brandon Nicholson, U.S. Environmental Protection Agency (EPA)

Date of Consultation Meeting: July 10, 2025

Consultation Meeting Participants: Brian Walker, CDPHE; Brandon Nicholson, EPA; Michelle Franke and Joyce Chavez, DOE; Jon Vail, Ryan Wisniewski, John Boylan, Eric Matynowski, George Squibb, and Caleb Artz, RSI

Related Contact Records: Contact Record (CR) 2008-07, CR 2013-02, CR 2013-03, CR 2014-09, CR 2015-03, CR 2015-06, CR 2018-02, CR 2019-02

Introduction:

The Original Landfill (OLF) at the Rocky Flats Site, Colorado, was used to dispose of solid sanitary and construction wastes generated during plant operations from 1952 to 1968. As part of the Rocky Flats Closure Agreement, DOE installed an engineered cover over the landfill which is also a component of the selected remedy/corrective action for the site. Today, DOE maintains this cover in accordance with the OLF Monitoring and Maintenance Plan, which is an enforceable requirement of the *Rocky Flats Legacy Management Agreement* (RFLMA) by reference.

After closure, the 2006 OLF Monitoring and Maintenance Plan required monthly inspections with the anticipated reduction to quarterly inspections in the long term. In 2007, as part of the required inspections, DOE identified conditions that warranted repair or triggered further investigation, which included localized slumping and settling of the cover as well as intermittent and continuous seeps on the cover. Through the years, DOE has addressed these conditions in the related CRs (as identified above) to ensure the integrity of the cover. These efforts culminated in the 2019 OLF Stabilization Project, which installed 267 ground anchors with reaction blocks to stabilize the hillside. Additionally, DOE installed ground anchor drains, exfiltration galleries, and trench drains to control the groundwater level, which is a significant factor in achieving stability.

Discussion:

Since the completion of the OLF Stabilization Project in 2020, DOE completes inspections of the OLF cover on a monthly basis. It conducts the inspections through visual examinations of the surface of the landfill cover for cracks, depressions, heaving, sinkholes, and seeps. Additionally, DOE surveys eight landfill settlement monuments quarterly to confirm that conditions remain within the expected design calculations.

The overall condition of the OLF soil cover has not changed since the completion of the stabilization project. Settlement has been within design limits, and there have been no observed conditions that warrant further repair or that trigger further investigation. Therefore, the RFLMA Parties agree to reduce the required frequency of periodic inspections from monthly to quarterly starting in the 4th quarter of calendar year 2025. DOE will continue to report the results of these inspections and the surveys of the settlement monuments within the Rocky Flats Site quarterly and annual reports. In the event that there is a reportable condition at the OLF, the RFLMA Parties will initiate a RFLMA consultation to determine what corrective measures and inspection frequency is appropriate.

DOE will incorporate this modification to the OLF Monitoring and Maintenance Plan with the next comprehensive revision of the plan, which is currently scheduled for the 4th quarter of 2025.

Resolution:

CDPHE, after consultation with EPA, approves this CR.

Action Complete:

The actions approved in this CR will continue as part of the OLF Monitoring and Maintenance Plan, as identified in the sections above and documented within the RFLMA. The RFLMA Parties will document any future changes to these steps separately.

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