

STATE OF COLORADO

Bill Owens, Governor
Jane E. Norton, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department
of Public Health
and Environment

October 5, 2001

Joseph A. Legare, Assistant Manager
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Stephen Nesta, Environmental Safety Manager
Remediation, Industrial D&D, & Site Services
Kaiser-Hill Company, L.L.C.
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Golden, Colorado 80403-8200

RE: Management of Groundwater from Building 444 at the Rocky Flats Environmental Technology Site (RFETS)

Dear Mr. Nesta and Mr. Legare:

Recently, Kaiser-Hill Remediation, Industrial D&D, and Site Services (K-H RISS) staff requested a determination from the Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") regarding the management of groundwater from Buildings 444 and 447. Historically and presently, groundwater has entered and collected in sumps in the basements of Buildings 444 and 447. It has been, and continues to be, necessary to pump out these sumps to prevent flooding of the basement. This groundwater is accumulated in and transferred through an interim status tank system which includes the following units: Canister Filter RCRA Unit 39.01 (for removal of solids; also known as "Fabric Filtration Unit 39.01"); Process Waste Tanks T-2 (RCRA Unit 40.04) and T-3 (RCRA Unit 40.05); Filter System Holding Tank T-4 (RCRA Unit 40.35); Sump Tank Under Fabric Filter (RCRA Unit 40.36); and Holding Tank T-6 (RCRA Unit 40.37). An August 23, 1999 letter from the Division confirmed the approval of the "RCRA Stable" status of these units and allowed the continuing use of these tanks for the collection of groundwater prior to transfer to Building 374 for treatment.

In order to proceed with the decommissioning of Building 374, RFETS stopped all transfers of wastewaters to the Building 374 wastewater treatment plant as of October 1, 2001. In light of this decision, RFETS would prefer to transfer the groundwater from Building 444/447 to the CERCLA Wastewater Treatment Plant located onsite in Building 891.

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ADMIN RECORD

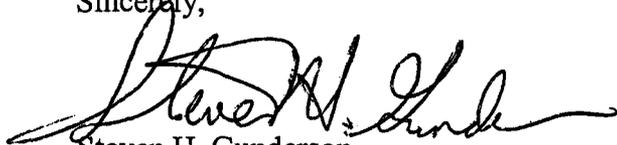
B444-A-000005

The Division has reviewed the analytical data for recent aqueous samples collected from Process Waste Tanks T-2 and T-3 in the basement of Building 444. The Division has also reviewed the data for recent aqueous samples collected from the Building 444 groundwater sump and has considered the information provided during discussions with Kaiser-Hill RISS staff. Based on the information provided, the Division has determined that the groundwater entering and leaving these RCRA Stable units is a remediation waste per the *Rocky Flats Cleanup Agreement (RFCA)*, and as such it may be managed in the CERCLA Wastewater Treatment Plant at Building 891 with the following conditions:

1. The groundwater must meet the acceptance criteria of the CERCLA Wastewater Treatment Plant at Building 891;
2. The Building 891 CERCLA Wastewater Treatment Plant must be able to treat the groundwater to meet applicable surface water discharge standards;
3. The groundwater must be sampled and analyzed for hazardous waste constituents (per 6 CCR 1007-3, Part 261, Appendix VIII) at least quarterly (adequate process knowledge may be used to eliminate some hazardous waste constituents from analysis);
4. If the levels of any hazardous constituent (per 6 CCR 1007-3, Part 261, Appendix VIII) exceed an action level of ten (10) times the respective MCL (i.e., Tier 2 MCLs as identified in *RFCA*, Attachment 5, Table 2 - Ground Water Action Levels), then the groundwater will be considered to be significantly impacted by RCRA process waste and will require treatment in an approved RCRA treatment unit.

Alternatively, the Division recommends that RFETS reconsider the deferral of completing closure of these RCRA units in Building 444/447. If these units are clean closed in accordance with the approved closure plan for interim status units, then they can be used for the management of groundwater without needing to meet at least condition number 4 as listed above. If you have any questions concerning these matters, please contact James Hindman at (303) 692-3345.

Sincerely,



Steven H. Gunderson
RFCA Project Coordinator

cc: J. Legare, DOE-RFFO
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