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CORRES. CONTROL  
INCOMING LTR. NO.

United States Government

Department of Energy

Rocky Flats Office

C211RF 90

# Memorandum



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DATE 6-27-90

BY *F. Hobbs*

JUN 26 1990

ER/EPD:JJR:7114

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- LLOYD, F.H.
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- SHANNON, W.M.
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- WARNER, R.B.
- YOUNG, E.B.

Proposal to Recycle Water From Pond C-2

Jack Kersh, Associate General Manager  
Environmental Restoration and Waste Management  
EG&G Rocky Flats, Inc.

We received a briefing from your staff on June 14, 1990, regarding the potential to recycle water from Pond C-2 for use in the plantsite raw water loop, where it would be used in cooling towers and other process applications. It is our understanding that your analyses indicate that these applications will consume all the runoff captured by C-2 in a typical year, plus the runoff generated by a three-day, 100-year storm event.

We are very interested, given the information that has been generated thus far, in having your staff prepare a more detailed analysis of this C-2 recycling option for potential incorporation into the plant's long-term water management plan. Specifically, we ask that this analysis address the following issues:

- I. It must be assured that the quality of water pumped from C-2 is compatible with its planned uses under this option. In particular, we are concerned with the levels of plutonium in C-2 raw water as indicated in your analysis. Are these levels representative of the most recent analytical data? Do the levels of plutonium present a concern when cooling tower blowdown is discharged to the sewage treatment plant and thence to the B-series ponds? How does the overall C-2 raw water chemistry compare to the chemistry of water now entering the cooling towers via the process water stream? Does the chemistry of C-2 water as we know it raise any concerns as regards its potential classification as a RCRA hazardous waste? The next phase of your analysis must address these and related questions, particularly as regards quantities and fates of plutonium.
- II. The next phase of the analysis must address the compatibility of the C-2 recycling option with other potential water quality management options. What will be the impacts of this action the proposal to recycle sewage treatment plant effluent for on-site uses? Will implementation of C-2 recycling adversely affect options currently being considered for treatment of highly contaminated waters from the solar pond areas? How does the admitted impermanence of this action affect its interaction with the longer-term management options now being developed, and what are the drawbacks in developing this as a permanent design? What are the additional costs associated with a permanent solution?

- BEYCHER, J.R.
- CARNIVAL, G.J.
- HARMAN, L.R.
- WHEAT, J.L.
- HOFFMAN, S.B.
- KLAMMAN, R.L.
- KRIEG, D.M.
- LOUCENBERG, G.E.
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- III. The next phase of the analysis must address this option's regulatory impacts, particularly as regards NEPA and the prospect of construction in SWMU's.

We intend to present this option to the regulatory entities involved to determine whether or not this action presents any regulatory concerns that have not yet been considered by us. As such, we would also like your staff to prepare a schematic diagram showing the pathways and fate of recycled C-2 water, as well as a timeline for design and construction of this system, assuming DOE approval.

It is our understanding that you want to implement this proposal by December, 1990. We will offer our support to expediting technical and regulatory review. We ask that you provide the information requested by June 27, 1990. Pending positive outcome of our review, we will request the funding necessary for implementation.

Please call Tom Lukow of my staff at extension 4561 if you have any questions.

*Thomas E. Simonson*  
*for*

David P. Simonson, Acting Assistant Manager  
for Environmental Management.

cc:

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