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EG&G ROCKY FLATS, INC.
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January 5, 1990



89-RF-4376

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David P. Simonson
Manager
DOE, RFO

This is in response to your letter to Rockwell International dated October 24, 1989 dealing with monitoring of the Building 374 evaporator effluent.

As you know, Rockwell was a signatory to the letter agreement dated August 22, 1989. The technical staff that participated in the drafting of that letter agreement understood at that time, and continue to believe, the Plant's obligation to monitor Building 374 evaporator effluent extended only to "VOC's and metals for which MCL's have been established" (See page 3 of the referenced letter.) They were somewhat surprised to learn that CDH intended that monitoring extend to those constituents "listed in 40 C.F.R. 141, Subpart B (with the exception of turbidity and microbiological contaminants) and for the initial analysis, the 83 contaminants listed in May 22, 1989, Federal Register (Vol. 54, No. 97, page 22140), again with exception of turbidity and microbiological contaminants. (See your letter dated October 24, 1989.)

Accordingly, we are bringing the following issues to your attention:

1. The monthly sampling program for monitoring Building 374 product water was finalized on October 20, 1989, at which time sampling activities commenced, in compliance with our understanding of the agreement letter dated August 22, 1989. However, to accommodate CDH's wishes, an initial screening analysis for the 83 contaminants listed in the May 22, 1989, Federal Register (Vol. 54, No. 97, Page 22140) will be performed by an off-site independent laboratory. Arrangements are currently underway to expedite this action. Should this analysis detect any of the 83 contaminants, the sampling plan will be revised to include monthly monitoring for these contaminants.
2. In the interim, the monthly sampling will continue to ensure the evaporator product water meets the same standards as that of incoming raw water to Rocky Flats Plant.

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3. Control values for radionuclides have been established and are incorporated in the NPDES Permit. The Building 374 product water sampling plan uses these established site-specific control parameters rather than those set forth in 40 C.F.R. Sections 141.15 and 141.16.

We request that you seek CDH concurrence with respect to these three items.

B. P. Warner
General Manager

Orig. and 1 cc - D. P. Simonson

I have held discussions with both Bob Lerche and Greg Underberg on this. We concur that at the wording here was a good idea at the time (December) but is not so good now. The original idea was to use 50 pCi/l for α and 50 pCi/l for β as in the NPDES permit. Due to the new standards, we will have to find another way to explain the values - we choose to