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Department of Energy

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Rocky Flats Office

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BNIVAL, G.J.		
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IRDOVA, R.C.		
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RRERA, D.W.		
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ALY, T.J.		
DAHL, T.G.	<input checked="" type="checkbox"/>	
BIG, J.G.		
IBY, W.A.		
ESTER, A.W.		
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NN, R.P.		
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KENNA, F.G.		
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DUYO, V.M.		
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EY, J.H.		
DLIN, N.B.		
TERWHITE, D.G.		
HUBERT, A.L.		
LOCK, G.H.	<input checked="" type="checkbox"/>	
PLER, R.L.		
LIVAN, M.T.		
ANSON, E.R.		
KINSON, R.E.		
SON, J.M.		
IF		
MOTYL, K	<input checked="" type="checkbox"/>	
PETTIS, S	<input checked="" type="checkbox"/>	
MURRAY, D	<input checked="" type="checkbox"/>	

APR 27 1993

EG&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

EPD:GSH:05021

Spray Evaporation of Landfill Pond and Transfer of Water from Ponds B-1 and B-2

G.H. Setlock, Director
Environmental Management
EG&G Rocky Flats, Inc.

In reply to your letter of April 19, 1993, requesting approval to begin spray evaporation of the Landfill Pond, and transfer of water from Ponds B-1 and B-2 to Pond A-2, the Department of Energy/Rocky Flats Office (DOE/RFO) hereby grants permission to start the above referenced operations, as outlined in the Interim Pond Water Management Plan, and agreed upon with the Colorado Department of Health (CDH). Review of current water quality data from the ponds indicates that the water meets Big Dry Creek Segment 5 standards, which is being used by CDH to determine if the water of the interior ponds "contains" hazardous waste or constituents. CDH has been sent the latest results of sampling, and requests that records of all analyses and water transfers be kept for their review at any time.

If you have any additional questions concerning this matter, please contact Mark Van Der Puy at 966-2473, or Gail Hill at 966-3424.

James K. Hartman
James K. Hartman,
Assistant Manager for Transition and
Environmental Restoration

- cc:
- M. Van Der Puy, EPD, RFO
 - G. Hill, EPD, RFO
 - K. Motyl, SWD, EG&G
 - S. Pettis, SWD, EG&G
 - D. Murray, SWD, EG&G

RES CONTROL	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
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viewed for Addressee
ores. Control RFP

18-93
DATE BY

Ltr. #



ADMIN RECCRD
IA-IA-A-00249

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4/26/93

DRAFT

Mr. J. David Holm
Water Quality Control Division
Colorado Department of Health
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Dear Mr. Holm;

Consistent with the Agreement in Principle provision allowing the Colorado Department of Health the authority to determine pond water from the Rocky Flats Plant is safe for discharge, your concurrence on a discharge from Pond C-2 is requested. Also, as requested by your staff, we are enclosing additional information on Pond C-2 water quality, operational parameters, and the status of the Pond C-2 recycle project.

We propose to begin discharge from Pond C-2 Wednesday, April 21, 1993. Determination of the need to treat the water prior to discharge has been made based on existing water quality data (Enclosure). Since the data from the C-2 pond indicates the water quality conforms with, or is below stream standards, untreated discharge will proceed. Discharge water will be sampled in accordance with established discharge monitoring procedures, and an additional three samples will be taken at the beginning, middle, and end of the discharge cycle for splitting with your division for analysis. Additional data will be provided to you as it becomes available. The city of Broomfield has been contacted.

Your staff asked for additional information on the status of the Pond C-2 recycle project, some of the Pond C-2 operational parameters, and dilution factors that may be seen during a concurrent discharge of both Ponds A-4 and C-2. This information is summarized below.

1. The average depth of Pond C-2 is, of course, dependent on the volume of water contained in the pond at that time. Average approximate depths at selected Pond C-2 percentage volumes are: at 10%, depth is 8 feet; at 30%, depth is 12.5 feet; at 50%, depth is 15 feet.
2. The highest amount of dilution that could be realized from a concurrent discharge of Ponds A-4 and C-2 would be approximately a 3-to-1 dilution. This would entail a simultaneous discharge from Pond B-5 to raise the discharge rate to 1500 gpm, and a discharge rate from Pond C-2 of 500 gpm. Because of dam safety considerations, the draw down rate of the ponds cannot be increased to effect a higher dilution ratio. We do not monitor flows in Big Dry Creek. However, the creek has been checked by EG&G personnel, and they report a substantial flow in the creek at this time that may be available to further dilute Pond C-2 water.
3. Studies on Pond C-2 waters were initiated last summer to attempt to determine the cause of occasional exceedences of the stream standard for plutonium. From the initial results, it appears that the elevated levels of plutonium in Pond C-2 are a result of complex adsorption-desorption chemistry potentially related to runoff sediments and pond sediments. The draft reports on the studies that took place at Pond C-2 last summer have recently been transmitted to the Department of Energy/Rocky Flats Office (DOE/RFO) for review. We should be able to complete our review, and submit a detailed summary, and these reports to the Department of Health by June 1993.

4. Meetings have been held recently between DOE/RFO and EG&G regarding the Pond C-2 recycle project. We believe we have relieved concerns regarding possible cross-connections between the recycled water and the raw water system for the plant, and we are moving forward to install a temporary recycle system by March 1994. Before using Pond C-2 water for recycling, we must also purchase or lease the water rights on those waters through water court. We will attempt to secure additional funding to make the system permanent during the next budgeting cycle.

Because Pond C-2 water meets all applicable stream standards, we would like to discharge that water presently, so we may retain adequate capacity to hold precipitation that will occur this summer. Since Rocky Flats appears to be the only site in the state that regularly confirms that stream standards are being met on a consistent basis, we believe that your staff is becoming unduly concerned about the water quality of our discharges. If pond water meets the stream standards, additional dilution from another water source is unnecessary.

Colorado Department of Health staff has already been provided the data on Pond C-2 water, and has given verbal concurrence to begin the discharge. We would appreciate a formal concurrence follow-up letter. If you have any additional questions concerning this matter, please contact Gail Hill of my staff at 966-3424.

Sincerely,

James K. Hartman
Assistant Manager for Transition
and Environmental Management

Enclosure

cc w/ Enclosure
J. Bruch, CDH

cc: (w/o Enclosure)
R. Shankland, EPA
M. Van Der Puy, EPD RFO
G. Hill, EPD, RFO
J. Dion, EPB, RFO
K. Motyl, SWD, EG&G
S. Pettis, SWD, EG&G
E. Mende, SWD, EG&G

DRAFT

T.G. Hedahl
Associate General Manager
Environmental and Waste Management
EG&G Rocky Flats, Inc.

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Sincerely,

James K. Hartman
Assistant Manager for Transition and
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