

United States Government

Department of Energy

memorandum

Albuquerque Operations Office

Rocky Flats Area Office

DATE: APR 12 1990



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REPLY TO
ATTN OF: EM/EPD:MEVDP:5657

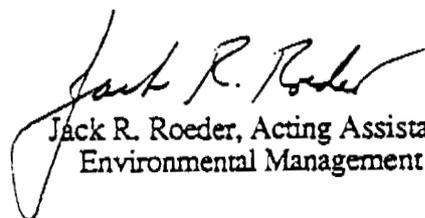
SUBJECT: Spray Irrigation

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

Please refer to the March 21, 1990 letter from the Department of Energy Rocky Flats Office (RFO) to the Colorado Department of Health (CDH) and the Environmental Protection Agency (EPA) (Attachment 1), responding to EPA's letter of January 9, 1990. The letter addressed the draft proposed Interim Measure/Interim Response Action Decision Document for Medium Priority Sites (Attachment 2), which was previously discussed with your staff.

In support of our response to CDH and EPA, please submit all available data on the quality of water spray irrigated. If the volume of data is cumbersome, please summarize the data and indicate where the original data may be reviewed. Also, please submit all available site characterization data for the areas at which spray irrigation has occurred in the past. This information should be provided to RFO within 15 days of receipt of this letter, as agreed by our staffs.

Please feel free to contact either myself or Mr. Tom Lukow of my staff on extension 4561 if you have any questions.


Jack R. Roeder, Acting Assistant Manager for
Environmental Management

2 Attachments

cc w/attachments:
K. B. McKinley, EG&G
F. Hobbs, EG&G

ADMIN RECORD

IA-A-000310

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MAR 21 1990

Mr. Robert L. Duprey, Director
 Waste Management Division
 U.S. Environmental Protection Agency, Region VIII
 999 18th Street, Suite 500, 8 WM-C
 Denver, Colorado 80202-2405

90 DOE 5537

Mr. Gary Baughman, Unit Leader
 Hazardous Waste Facility
 Colorado Department of Health
 4210 East 11th Avenue
 Denver, Colorado 80220

Gentlemen:

In January 1990 you provided this office with comments on the Draft Proposed Interim Measure/Interim Remedial Action (IM/IRA) Decision Document for the Medium Priority Sites. These comments raised, among other things, concerns about continued use of spray irrigation from the sewage treatment plant. Since your letter indicated a desire to discuss the matter, conveying no sense of urgency, we responded by indicating that we are preparing a document which would address discontinuing use of spray irrigation. Since then, we have learned from your staff that any spray irrigation at the current location is considered to be unacceptable, and regardless of location may be in violation of the Colorado Solid Waste Management Act. This letter serves to outline the historical perspective of spray irrigation at the Rocky Flats Plant (RFP), and to request your concurrence with agreements reached informally by our staffs.

As you know, the RFP has historically used spray irrigation at the present site as a preferred option to releasing water from the holding ponds, as allowed for under the existing National Pollutant Discharge Elimination System (NPDES) permit. Unfortunately, there has been past miscommunication between the U. S. Environmental Protection Agency (EPA) and RFP as to what constitutes "good engineering practices" with regard to spray irrigation. This has led to spray irrigating during conditions which have resulted in overland flow and ice buildup during freezing weather. In recognition of the potential problems associated with the manner of spray irrigation, the Rocky Flats Office (RFO) recommended specific wording in the draft Federal Facility Compliance Agreement (FFCA) to eliminate surface runoff and ice buildup. Also, recognizing potential problems with the current spray field location, RFO recently directed EG&G to develop a plan to address all aspects of water management, including spray irrigation, with the desired intent of being able to stop irrigation once treatment units needed to meet new Water Quality Control Commission (WQCC) regulations are in place.

In discussing the matter with your staff, we explained that immediate cessation of all spray irrigation would have the undesirable effect of forcing pond water discharge prior to the emplacement of temporary treatment units, now being procured to enable RFP discharges to meet new stream standards. Such discharge would also result in a violation of the

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MAR 21 1990

Mr. Robert L. Duprey
Mr. Gary Gaughman

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Agreement in Principle with the State of Colorado and undoubted outcry from downstream water users. Since spray irrigation has occurred at the site for years, we pointed out that some compromise needed to be reached.

As a result of discussions with Ms. Judy Bruch and Mr. Fred Dowsett from the Colorado Department of Health (CDH), and Mssrs. Nat Muillo and Robert Shankland from the EPA, the following conclusions were reached and agreed upon:

1. RFP must discontinue spray irrigation at the west half of the spray field.
2. RFP may continue to spray irrigate on the east half provided no surface runoff or ice buildup occurs.
3. RFP may restart irrigation at the north side of Pond B-3 and install a new field to the south of B-3.
4. RFP will continue it's efforts to procure treatment capability, with the potential for eliminating the need for spray irrigation.
5. RFP will supply EPA and CDH with available data on the quality of water spray irrigated. RFP will also provide available site characterization data.
6. CDH agrees that spray irrigation in accordance with NPDES permit conditions is not a violation of the Colorado Solid Waste Management Act.

Your concurrence to the above is requested.

If you or your staff have any question, please feel free to contact me or Tom Lukow of my staff at 966-1576.

Sincerely,

Robert M. Nelson, Jr.
Manager

cc: P. Frohardt, CDH
J. Kersh, EG&G/RF
F. Hobbs, EG&G/RF