



**COLORADO  
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OF HEALTH**

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273 L048

4/5/91

Randy

FYI, CDH's Comments  
on Solar Ponds EA.

*Steve Nestor*

April 4, 1991

Mr. Robert Nelson, Jr.  
Manager  
U.S. Department of Energy  
Rocky Flats Office  
P.O. Box 928  
Golden, Colorado 80402-0928

Dear Mr. Nelson:

Following are Colorado Department of Health Comments on the Environmental Assessment prepared for the Dewatering and Partial RCRA Closure of the Solar Ponds at the Rocky Flats Plant Site.

In general, there appear to be some inconsistencies in the descriptions of the proposed action and the associated regulatory actions that accompany it. In particular, initial descriptions of the proposed action appear to indicate that the activities for all of the ponds are identical. As this is not entirely true for Pond C, a background description for this pond should be added and initial descriptions of the proposed action should reflect which actions pertain to Ponds A and B and which pertain to Pond C.

Additionally, the discussion in the EA should discuss in more detail the regulatory actions associated with the holding tanks for ground water collected from the interceptor trench system. As this portion of the partial RCRA closure will be handled as an interim measure under the IAG, there will be additional provisions for public involvement. As there is likely to be concern for the possibility of contaminated ground water being held in these tanks to be released to North Walnut Creek, should the integrity of the tanks be breached, all precautionary measures to be taken and all additional regulatory actions pertaining to this part of the closure should be identified in the EA.

*Need interim measure study*

*Kirk Tinkner*

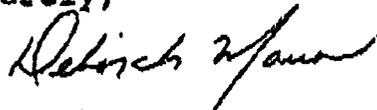
*Stoller will talk to Pickrel in FE. & get design info.*

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As considerable lag time appears to often exist between preparation of initial draft NEPA documents and the final version, it is imperative that the final version be revised to be accurate and contain the most current design information. Areas subject to additional modification should be identified as such.

Attached are more specific comments on the Solar Ponds Partial RCRA Closure EA. We appreciate the opportunity to provide our input. If you have any questions or concerns regarding our review, please contact me or Debbie Mauer of my staff at 331-6730.

Sincerely,



*for* Barbara L.S. Barry  
Rocky Flats Program Manager

cc: Dave Simonsen, DOE  
Tom Lukow, DOE  
Joe Wienand, DOE  
Gary Baughman, HMWMD  
Noreen Matsuura, HMWMD