

STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH

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Roy Romer
Governor

Thomas M. Verr
Executive Director

August 23, 1991

Mr. Joseph Wienand
DOE Rocky Flats Plant
P.O. Box 928
Golden, CO 80403-0928

Dear Mr. Wienand:

The Colorado Department of Health Hazardous Materials and Waste Management Division, "The Division" approves the release of the "Proposed Interim Measure/Interim Remedial Action Plan Decision Document for the Solar Ponds Operable Unit 4" to begin the sixty day public comment period as long as the following items are changed in accordance with the meeting on August 20, 1991 and the telephone conversation which took place the afternoon of August 22, 1991.

Section 3.1.2.2 Equipment Description of the Surge Tanks page 3-15:

In order to meet the RCRA definition of a double walled tank, for purposes of secondary containment the tank design must be modified to include a bottom under the liners which provides structural support made of primarily non-earthen materials, concrete, metal or asphalt.

In order to prevent overfilling and to provide secondary containment for overfilling all three tanks must be provided with high level alarms which will automatically shut down the feed pumps and begin pumping excess water to either Building 374 or some other tank which is not full. The amount of freeboard required for the surge tanks will be addressed during the public comment period. If there was a catastrophic failure of any of the surge tanks there is a distinct probability that endangerment to the public would occur as the result of stirring up the radioactively contaminated sediments in the "A Series" ponds on North Walnut Creek.

The surge tanks should be more accurately described as "double-walled tanks" which provide secondary containment from spills at the bottom of the tank by the double wall and the automatic leak detection system in the sump and from overfilling by the automatic high-level feed cut off and pump system to other tanks. The 80-mil HDPE primary liner should be referenced as an 80-mil HDPE primary wall.

Table 4-1 Potential Chemical Specific ARAR's/TBC's for Parameters page 4-12.

Trichloroethylene has been left off the list of organics and must be added.

The "Division" will address the adjustable operational details of the IM/IRA during the public comment period. If you have further questions regarding these comments please feel free to contact Noreen Matsuura of my staff at (303) 751-4890.

Sincerely,



Gary W. Baughman, Unit Leader
Hazardous Waste Facilities
Colorado Department of Health
Hazardous Materials and Waste Management Division

cc. Tom Lukow, DOE
Kirk Ticknor, EG&G
Arturo Duran, EPA
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