



## Department of Energy

ROCKY FLATS OFFICE  
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93-DOE-09964

AUG 25 1993

Mr. Gary Baughman  
Hazardous Waste Facilities Unit Leader  
Colorado Department of Health  
4300 Cherry Creek Drive South  
Denver, CO 80222-1530

Dear Mr. Baughman:

In response to your letter of July 29, 1993, RE: Appendix E, Quality Assurance Addendum (QAA) to the IM/IRA Decision Document for the Solar Evaporation Ponds, in which you commented on RFO's unwillingness to seek a Prevention of Significant Deterioration Permit for the operation of the Building 910 Evaporators, we wish to clarify the strategy that RFO is pursuing in this regard.

First and foremost, we want to reiterate that the 114 operational days for the evaporators is more than adequate to handle the expected water volumes that will be pumped from the Interceptor Trench System (ITS). The 114 days is based on all three evaporators operating simultaneously at the design capacity of 18,000 gallons, per day, per evaporator, twenty four hours a day. This equates to over six million gallons per year. This six million gallons was based on inputs of an anticipated two million gallons of excess water from the ponds (the first year only) and an estimated four million gallons collected by the ITS. As you are aware the excess pond water has been successfully transferred to and processed by the Evaporators at Building 374. It is anticipated that no pond water will ever be processed at Building 910.

Based on current knowledge, we also believe that the four million gallons of ITS water was an extremely conservative estimate. Since the Modular Tanks have come on line, we have been collecting accurate data on ITS water collection rates due to the fact that a flow totalizer has been installed in the ITS pump house and water level scales have been installed at the tanks. From April 1993 through July 1993, approximately 724,800 gallons of water have been pumped from the ITS sump to the Modular Tanks. With this information and precipitation data from the current and past years (1976 to 1992), we have performed an analysis and estimate that the ITS collection rate would be approximately 2.5 million gallons per year.

In addition, the EG&G Surface Water Division estimates that 36% to 56% of the ITS water is due to runoff from the Building 779 area and thus should not be collected by the ITS. Plans are underway to divert this runoff from the ITS. This diversion should be in place early in fiscal 1994. Taking the conservative figure of a 36% contribution from the Building 779 area would bring the yearly total of water collected at the ITS to approximately 1.55 million gallons per year. This figure does not account for the evaporation rates at the tanks, which, based on our observations, is substantial.

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As to our reasons for not seeking a Prevention of Significant Deterioration Permit, the overall strategy for air emissions control at Rocky Flats has influenced our choices for Building 910. In the fall of 1991, when permitting for Building 910 was begun, the Rocky Flats Plant was considered a "major source" of oxides of nitrogen (NO<sub>x</sub>); that is, the plant was considered to have the potential to emit over 250 tons per year of NO<sub>x</sub>. As a major source, any new source such as Building 910 was limited to emissions of 40 tons of NO<sub>x</sub> per year unless a Prevention of Significant Deterioration (PSD) permit was obtained.

Since that original designation as a major source assumed all sources were in operation 24-hours a day, and since many of those sources were equipment such as *emergency generators* that did not, in practice, operate very often, DOE chose to apply for permits for the plant's significant sources. By controlling those individual sources via permit, the plant could be redefined as a minor source. This approach will create permits that more closely reflect actual operations. CDH is presently in the process of reviewing the plant's applications and we feel the plant will, indeed, be considered a minor source. NO<sub>x</sub> emissions can then be permitted without resort to a PSD permit, as long as the plant remains a minor source.

In light of the extreme conservatism of the operating-capacity of Building 910 allowed under the current permit, and the opportunity that will exist to increase operating hours once CDH has completed all the Rocky Flats permit applications, DOE believes pursuit of a PSD permit would add no value to the IM/IRA operation of Building 910.

As to your granting of a "conditional approval" to the Quality Assurance Appendix (QAA), we feel it is inappropriate in light of the discussions above and due to the fact that the QAA is not the document that governs the operational time of the Building 910 Evaporators, but one that governs the operational quality of the evaporators. We, therefore, request that your approval to the QAA be granted.

Sincerely,



Richard J. Schassburger  
Acting Director  
Environmental Restoration Division

cc:

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