

DIST.	TR	ENC
MARAL, M.E.		
NEDETTI, R.L.		
NJAMIN, A.		
NRMAN, H.S.		
NANCH, D.B.		
NRNIVAL, G.J.		
NRPP, R.D.		
NRVIS, J.G.		
NRRRERA, D.W.		
NRNNI, B.J.		
NRMRMAN, L.K.		
NRALY, T.J.		
NRDAHL, T.		
NRBIG, J.G.		
NRBY, W.A.		
NRJESTER, A.W.		
NRANN, H.P.		
NRFX, G.E.		
NRDONALD, M.M.		
NRKENNA, F.G.		
NRNTROSE, J.K.		
NRORGAN, R.V.		
NRATTER, G.L.		
NRZZUTO, V.M.		
NRLEY, J.H.		
NRSING, T.L.		
NRNDLIN, N.B.		
NRFLOCK, G.H.		
NRSEWART, D.L.		
NRILLIVAN, M.T.		
NRVANSON, E.R.		
NRKINSON, R.B.		
NRLLIAMS, S. (ORC)		
NRLSON, J. M.		
NRYANT, R.B.		
<i>W. Boyle</i>		
<i>J. Brubinger</i>		
<i>J. Edwards</i>		
<i>C. Gorden</i>		
<i>H. Nestor</i>		
<i>T. Ogg</i>		
<i>A. Ringle</i>		
<i>L. Ryder</i>		
<i>T. Shain</i>		
<i>5/2</i>		
<i>5/7 Records</i>		
NRBRES CONTROL	x	x
NRMIN RECORD		
NRTS/T-130G		
NRAFFIC		

EG&G ROCKY FLATS, INC.
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August 31, 1993

93-RF-10641

F. R. Lockhart
Environmental Restoration Division
DOE, RFO

ANNUAL REPORT ON SOLAR PONDS MITIGATION IMPLEMENTATION - SRK-189-93

EG&G is currently preparing the annual Mitigation Implementation Plan Verification Report, as required by DOE Order 5440.1E. The report will include the status of mitigation activities from the Solar Ponds Environmental Assessment (DOE/EA-0487). Most of the mitigation commitments will be reported as closed, but several remain open. Since the report format is tailored to meet the needs of National Environmental Policy Act (NEPA) implementation, I am providing this letter to transmit some additional, programmatic information to you that supports the upcoming report.

1. A group of commitments are related to controlling the cementation process for pond sludge and disposal of the resulting pondcrete. These items will remain open until sludge is solidified. Solidification will probably be deferred until a disposal site is ready to accept the solidified waste form, and can therefore provide waste acceptance criteria to guide processing, so the storage period for the sludge is likely to continue for several years. DOE should expect to see no change in the status of these commitments during the sludge storage period.

Commitments within this group include: Solidify sludge in a wet process (I. D. Number 03.005); ship pondcrete in compliance with DOT and 49 CFR requirements (05.001, 06.001 & 002); comply with RCRA regulations such as Land Disposal Restrictions (05.002 & 004); and certify the pondcrete meets waste acceptance criteria (05.005 & 008).

2. A group of commitments are related to the eventual installation of permanent tanks to replace the Temporary Modular Storage Tanks placed in service in April, 1993. The installation of permanent tanks has not yet progressed to the point of requiring explicit planning on a Work Package level. EG&G expects to link the planning for permanent tanks with the Phase II remediation of Operable Unit 4 ground water. DOE should expect to see no change in the status of these commitments until Phase II remediation begins.

Commitments in this group include: Permanent tanks will be fabricated (01.005); a berm will be installed around the permanent tanks (01.012); and the old tank pad will be stabilized (01.016).

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 PARTIAL/OPEN
 CLOSED

APPROVALS:

DRIG & TYPIST INITIALS

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R. F. Lockhart
August 31, 1993
93-RF0-10641
Page 2

3. A group of commitments are related to controlling migration of contaminants from the empty ponds. EG&G has deferred planning for the installation of a coating or covering on the dry pond bottoms, as was committed in the EA. It seems prudent to develop some information on the closure options to be considered prior to such installation, so EG&G could reasonably assure that any coating or covering proposed would not impede closure.

We are aggressively planning to accelerate the IAG schedule for closure, and the necessary information should be available by December, 1994. We feel this delay is acceptable since migration of constituents does not appear to be a problem: air-monitoring data (which will be presented in the annual report) indicate no significant increase in air-borne plutonium has been observed since the 207 A pond was emptied (plutonium should provide a good tracer for any resuspended constituents), and precipitation water is actively removed from the empty ponds, rather than left to evaporate (or percolate) naturally. It may be possible to omit the coating/covering entirely if the ponds can be promptly closed.

Commitments in this group include: Use of impermeable materials (10.001); temporary measures to prevent resuspension (10.002), and minimize dust generation (02.007).

Call me @ X8541 if you wish to discuss these commitments further.


S. R. Keith
Program Director
Solar Pond Projects
EG&G Rocky Flats, Inc.

KCL/clh

Orig. and 1cc-R. F. Lockhart

cc:

A. H. Pauole-DOE, RFO
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R. Schassburger-DOE, RFO