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# STATE OF COLORADO



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Executive Director

**COLORADO DEPARTMENT OF HEALTH**  
*Dedicated to protecting and improving the health and environment of the people of Colorado*

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April 26, 1993

Mr. Richard J. Schassburger  
U.S Department of Energy  
Rocky Flats Plant  
Building 116  
P. O. Box 928  
Golden, Colorado 80402-0928

**RE: SOLAR PONDS REMEDIATION PROJECT PATH FORWARD (OU-4)**

Dear Mr. Schassburger,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division) and the U. S. Environmental Protection Agency (EPA) hereby respond to a letter from DOE (Fraser Lockhart to the undersigned) dated April 6, 1993 on the referenced subject.

We support DOE's concept of investigating alternatives to the remediation baseline (Halliburton-NUS poncreting) for the elimination of excess liquids and the removal and stabilization of sludges from the 207B-Series Ponds and Pond 207C. We have yet to conclude that consolidating sludge in relined ponds is the only or most viable approach nor do we specifically endorse the proposed administrative mechanism or the proposed schedule. Nevertheless, in view of the uncertainty that has arisen over the availability and waste acceptance criteria of the Nevada Test Site (NTS) coupled with our insistence that potential sources of contamination be eliminated, we believe that the respective consolidation of sludges from the above referenced ponds into relined Ponds B-North and B-Center **may** be an acceptable, temporary solution. Consolidation of all B-Series sludges into B-South as a first step to allow the continuation of RFI/RI investigations is acceptable and should proceed, if possible, at an accelerated pace.

We question the need for a "new" IM/IRA in addition to the IAG scheduled IM/IRA Decision Document. If the initial RFI/RI data is sufficient to determine whether the existing liners of Pond B-North and B-Center must be removed, then the data should be sufficient to perform a RCRA closure of these two ponds. Also, by integrating RFI/RI investigations with IM/IRA decisions and developing a flexible, staged IM/IRA Decision Document, the closure of all solar ponds can be administered under a single IM/IRA. Closure may entail the removal of the liners and underlying contaminated soils or closure in place if hazardous waste is not found in the form of

liners or contaminated soil. By moving the closure IM/IRA DD forward, it may be possible to recover a portion of the IAG schedule.

As stated above, we have not determined whether consolidation of sludge is the most viable option. Additional time is needed to review the Pond sludge options analysis previously transmitted to EPA and the Division. For example, at our monthly status meeting of April 20th, the concept of drying Pond 207C brine was revitalized with RFP's disclosure that the brine may not be an oxidizer, and therefore not a storage risk, as previously suggested by RFP.

We also do not at this time concur that the removal and containerized storage of sludge is "no quicker" than sludge consolidation at emptying the ponds; this issue requires further consideration by the Division and EPA.

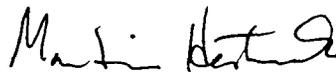
In view of these factors, departure from the baseline is acceptable but the new course of action may be further altered in the ensuing months.

If you have any questions, please call Harlen Ainscough of the Division at 692-3337 or Arturo Duran of EPA at 294-1080.

Sincerely,



Gary W. Baughman, Chief  
Facilities Section  
Hazardous Waste Control Program



Martin Hestmark, Manager  
Rocky Flats Program  
U. S. Environmental  
Protection Agency

cc: Daniel S. Miller, AGO  
Jackie Berardini, CDH-OE  
Frazer Lockhart, DOE  
Scott Surovchek, DOE  
Ed Lee, EG&G  
Wanda Busby, EG&G  
Randy Ogg, EG&G