

 **EG&G ROCKY FLATS**
INTEROFFICE CORRESPONDENCE

20505

DATE: February 12, 1991 Evap.Mtg2-91
TO: P. W. Edrich, Manager, RCRA Permitting, T130C, x7752
FROM: *KWT* K. W. Ticknor, RCRA Permitting, T130C, x6344
SUBJECT: MEETING WITH CDH, EPA AND DOE TO DISCUSS PERMITTING OF THE
EVAPORATION TECHNIQUES FOR THE SOLAR EVAPORATION PONDS

On January 24, 1991, representatives from CDH, EPA, DOE, and EG&G met to discuss permitting of the evaporation techniques (i.e., blue dye, floating aerators, heater/soaker pipe system, and portable evaporators) and french drain surge tanks for the solar evaporation ponds. The purpose of this memo is to document the discussion of that meeting. A list of meeting attendees is attached to this memo.

A brief presentation was given by J. Wienand (DOE-RFO). He noted that water from the ponds' french drain system currently discharges to the 207B North pond. He stated that the water from the french drain system needed to be sent to surge tanks in order to prevent further accumulation of liquids in the ponds. He gave a general description of the proposed design and location for the temporary surge tanks that would be used to hold french drain water prior to treatment of the water in the portable evaporators (see attached meeting handout). Wienand noted that permanent french drain surge tanks would be installed in the mid 1990's if still needed.

Wienand stated that DOE's position was that no RCRA permits would be required for the evaporation techniques and the french drain surge tanks. He stated that the evaporation techniques and surge tanks could be incorporated into the reports that are required as part of the corrective action for the solar evaporation ponds outlined in the Environmental Restoration Inter-Agency Agreement (IAG).

Baughman (CDH) stated that a modification to our RCRA Part B Operating Permit would eventually be needed for the evaporation techniques and french drain surge tanks if we planned to operate them beyond the deadline for operation of interim status units (November 8, 1992). This was a surprising statement because this was contrary to CDH's previous position that no permits would be required for treatment or storage of hazardous wastes generated as part of corrective actions. Baughman further stated that once our permit is issued, changes to interim status would no longer be used and instead changes will be handled as permit modifications. *(Note: CDH's position on interim status changes makes sense for the units that will be included in the permit that is to be issued this spring. However, several RCRA-regulated units (e.g., NOID and TRU units) at Rocky Flats will not be included in that permit. In my opinion, those units will still be operating under interim status after the permit is issued. If we make changes*

ADMIN RECORD

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REVIEWED FOR CLASSIFICATION/UCNI
BY <u>G. T. Ostdiek</u> <i>GO</i>
DATE <u>5-5-93</u>

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to those units, I think we will have to submit a change to interim status or a modification to our Part B Application rather than submit a permit modification. CDH's position also explains why they required a change to interim status for the evaporation techniques and surge tanks. It appears as if CDH views these techniques and tanks as permitted units. Therefore, a change to interim status is needed to operate the evaporation techniques and tanks under interim status and a permit will be needed to operate those units beyond the deadline for interim status. However, I don't understand why they haven't asked us to assign a RCRA unit number to the techniques and tanks.)

Baughman noted that the draft HSWA Permit (also called the corrective action part of the permit) would be included as part of our Part B Permit when it is issued this spring. Baughman thought the corrective action part of our permit might also require modification if the evaporation techniques and surge tanks will operate beyond the deadline for interim status. *(Note: The corrective action part of our permit will contain a reiteration of all the corrective action milestone dates that are in the IAG. Therefore, CDH was waiting for the IAG to be finalized and signed before they would issue our Part B Permit.)*

During the meeting, I noted CDH's position on permitting for corrective actions conflicted with a previous agreement made during a meeting last fall with CDH and EPA. The agreement was that no RCRA permits would be required for corrective actions conducted under the IAG. Specifically, no RCRA permits would be required for the storage tanks on the decontamination pads that would be used for cleaning equipment associated corrective actions. Baughman said that they meant that no permit would be required for the tanks on the decontamination pads as long as the wastes were stored no longer than 90 days. *(Note: If CDH really intends to require permits for all hazardous waste treatment and storage units associated with corrective actions, then the scope of the submittals required under the IAG will change drastically. This position was also a surprise to R. Ogg (ER), who was not planning on submitting permit modifications for corrective actions. CDH's position appears to be consistent with the draft HSWA Permit. The draft HSWA permit states that "For all Operable Units at which hazardous constituents are identified to be present at the end of the Feasibility Study/Corrective Measures Study stage, the State will prepare a Corrective Action Decision (CAD) and modify the permit to incorporate the selected remedy." It also states that "All units that treat, store, or dispose of hazardous and/or mixed waste generated by facility operations are subject to the substantive and procedural requirements of the CHWA including permitting requirements.")*

E. Lombardi (EG&G, Waste Programs) asked if a change to interim status or a permit modification for the french drain surge tanks should be submitted. Baughman thought that the technical information required by a permit modification and a change to interim status would be the same. Therefore, he concluded that the format of the request would make no difference to CDH. Baughman thought the format of our request would only depend whether or not the Part B

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Permit is issued at the time of the request (i.e., a permit modification would be required if the permit was issued). Baughman expected the Rocky Flats Part B Permit would be issued in the next couple of months. *(Note: I agree the technical information required for the permit modification would be essentially the same as the information for a change to interim status. However, the format of a permit modification makes it much more difficult to prepare. Therefore, I think it would be advantageous to submit our request as a change to interim status.)*

M. Hestmark (EPA CERCLA Division) thought a permit modification or change to interim status would bypass the CERCLA process. EPA and CDH argued over this issue at length. *(In my opinion, both EPA and CDH want as much control in the cleanup of the solar evaporation ponds as possible.)* CDH and EPA seemed to reach agreement that the CERCLA process would basically be satisfied if DOE submitted a change to interim status, the change to interim status was subjected to public comment, and the information required for an Interim Measure Decision Document was submitted with the request. *(Note: An Interim Measure Decision Document for the surge tanks would basically consist of a project description, discussion of alternatives, comparison of the expected contamination levels of the french drain water against health based levels, and the standards applicable to the tank design. I think the only difficult information to provide would be the comparison of the contamination levels against health based levels. However, I do not necessarily agree that the installation of the surge tanks constitutes an "interim measure". We should review this with ER and determine whether or not the interim measure information needs to be submitted.)*

J. Bruch (CDH Water Division) made the point that she wanted a regulatory framework that would provide the quickest way to start the cleanup of the ponds in order to minimize any further migration of the contaminants in the ponds.

After the meeting, Hestmark and Shankland (EPA NPDES Permit Division) told me that they thought airborne suspension and runoff of radionuclides during construction of the french drain surge tanks would be a major public concern based on their experience with other cleanup actions at Rocky Flats. They suggested we address those issues as part of the change to interim status for the surge tanks.

Attachments:

As stated

KWT:aaf

cc:

M. B. Arndt
P. M. Arnold

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A. A. Church
P. W. Edrich *PWE*
J. E. Evered
D. R. Ferrier
T. C. Greengard
J. M. Kersh
M. E. Levin
E. F. Lombardi
R. V. Morgan
R. *Ogg*
G. L. Potter
J. D. Roberts
P. Robledo
A. L. Schubert
G. S. Taylor
P & C Files

List of Attendees

CDH:

- H. Ainscough
- G. Baughman
- J. Bruch
- F. Dowsett
- J. Love
- N. Matsuura
- D. Mauer

EPA:

- A. Duran
- M. Hestmark
- B. Shankland

DOE-RFO:

- J. Wienand
- B. Lewis

EG&G:

- M. Arndt
- D. Ferrier
- E. Lombardi
- R. Ogg
- K. Ticknor

DOE mtg handout
1/24/90

AGENDA

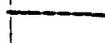
PLANS FOR FRENCH DRAIN WATER CONTAINMENT/TREATMENT

- TANK LOCATION
- FRENCH DRAIN REPAIRS

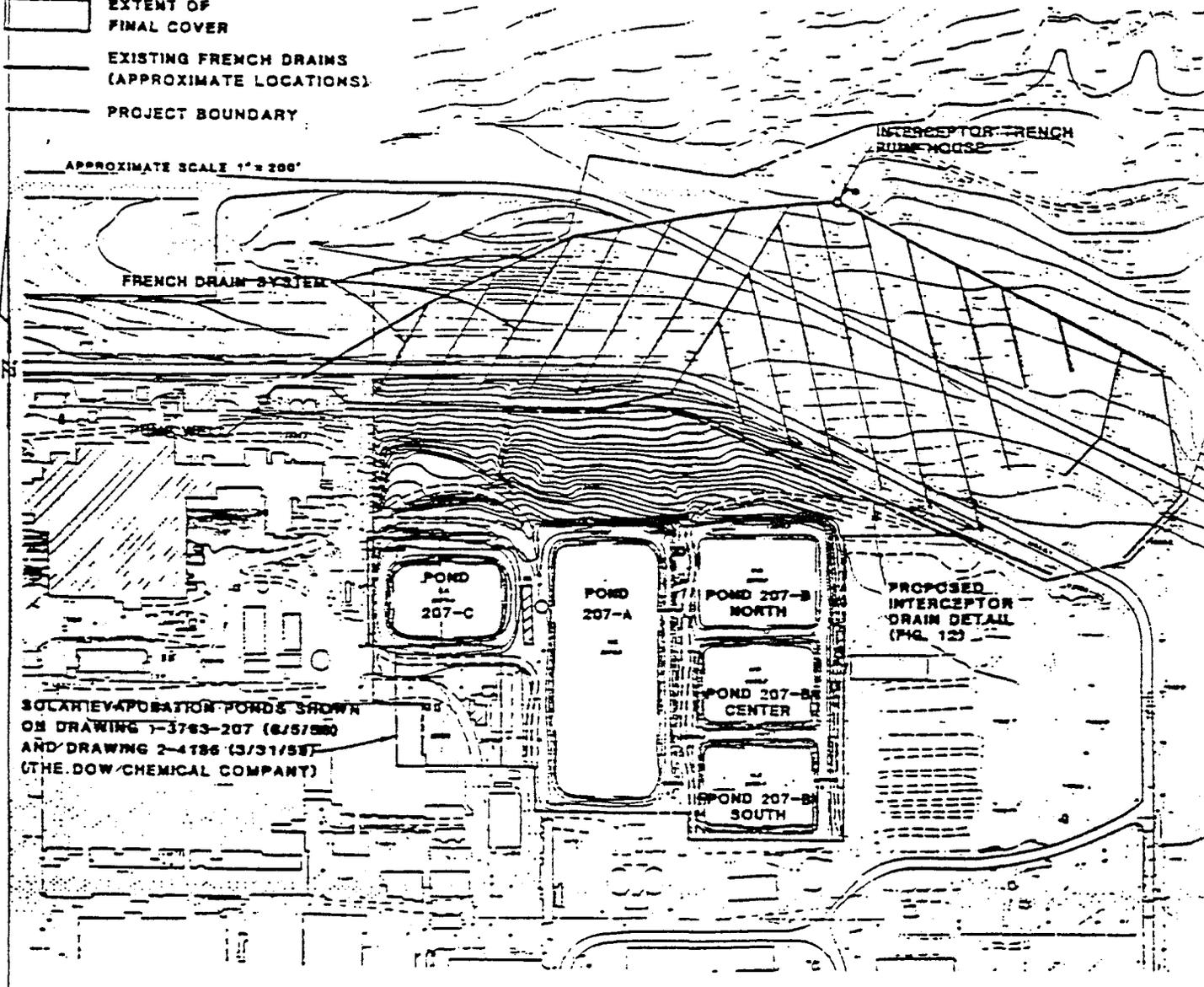
SCHEDULE FOR PORTABLE EVAPORATOR INSTALLATION

PROPOSED STRATEGY FOR PERMITTING TANKS/TREATMENT UNITS

DISCUSSION

-  EXTENT OF FINAL COVER
-  EXISTING FRENCH DRAINS (APPROXIMATE LOCATIONS)
-  PROJECT BOUNDARY

APPROXIMATE SCALE 1" = 200'

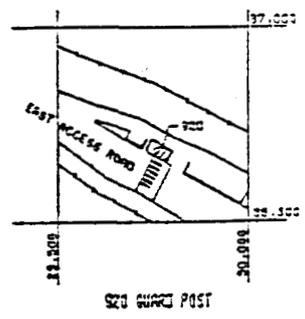
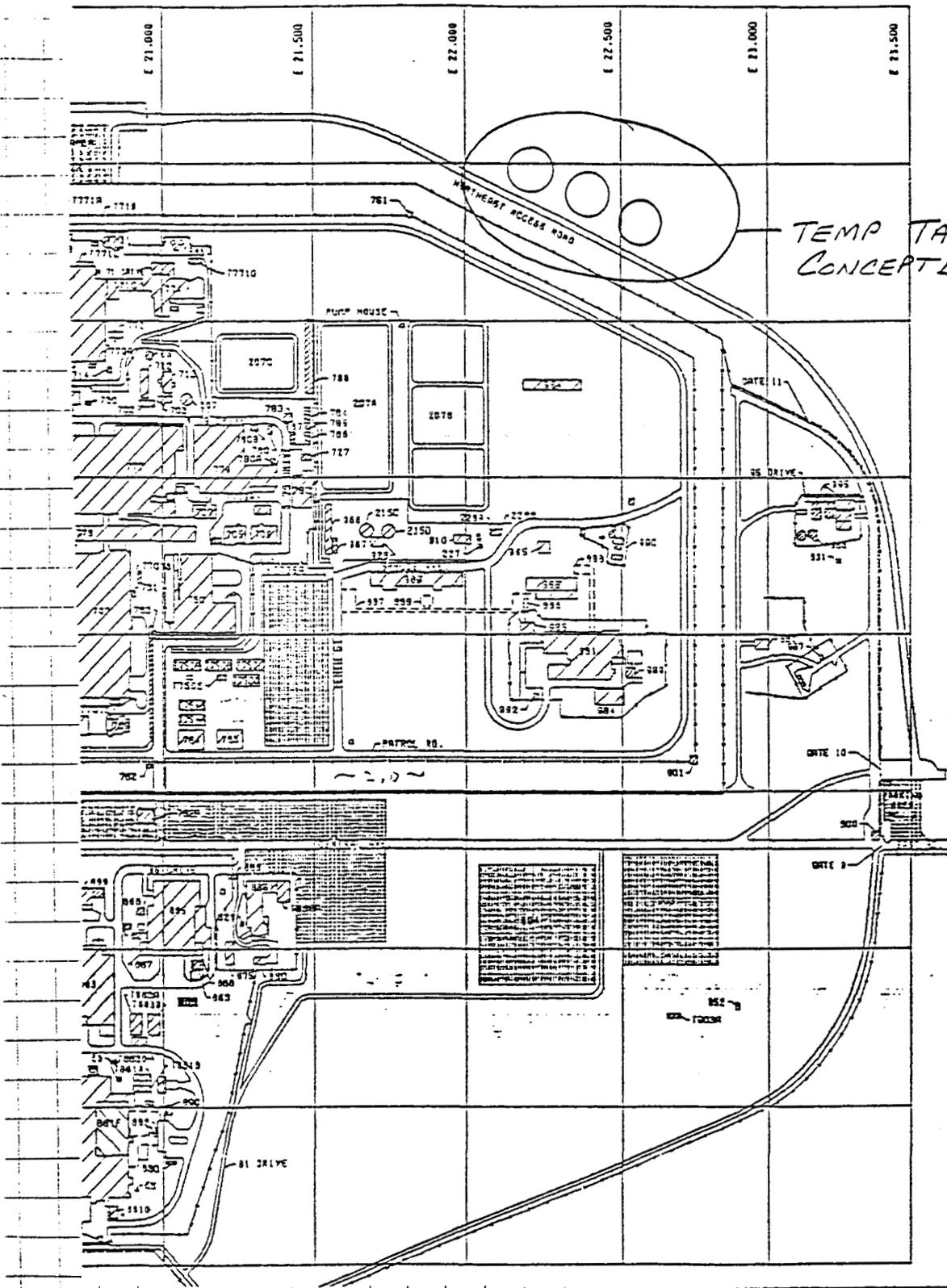


FRENCH DRAIN SURGE TANKS

- TEMPORARY SURGE TANKS PLANNED (3-750K GAL MODULAR)
DOUBLE CONTAINMENT/LEAK PROTECTION
DOUBLE PIPING BETWEEN TANKS
HDPE LINERS
CONSTRUCTION SCHEDULED FOR COMPLETION LATE SUMMER '91
- TANK LOCATION NEAR FRENCH DRAIN PUMP HOUSE
- PERMANENT TANKS PLANNED FOR MID 90'S SAME AREA

LEGEND

-  BLOCK OR STRUCTURE
-  PAVED AREA
-  FENCE
-  RAILROAD TRACK
-  UNDERGROUND STRUCTURE

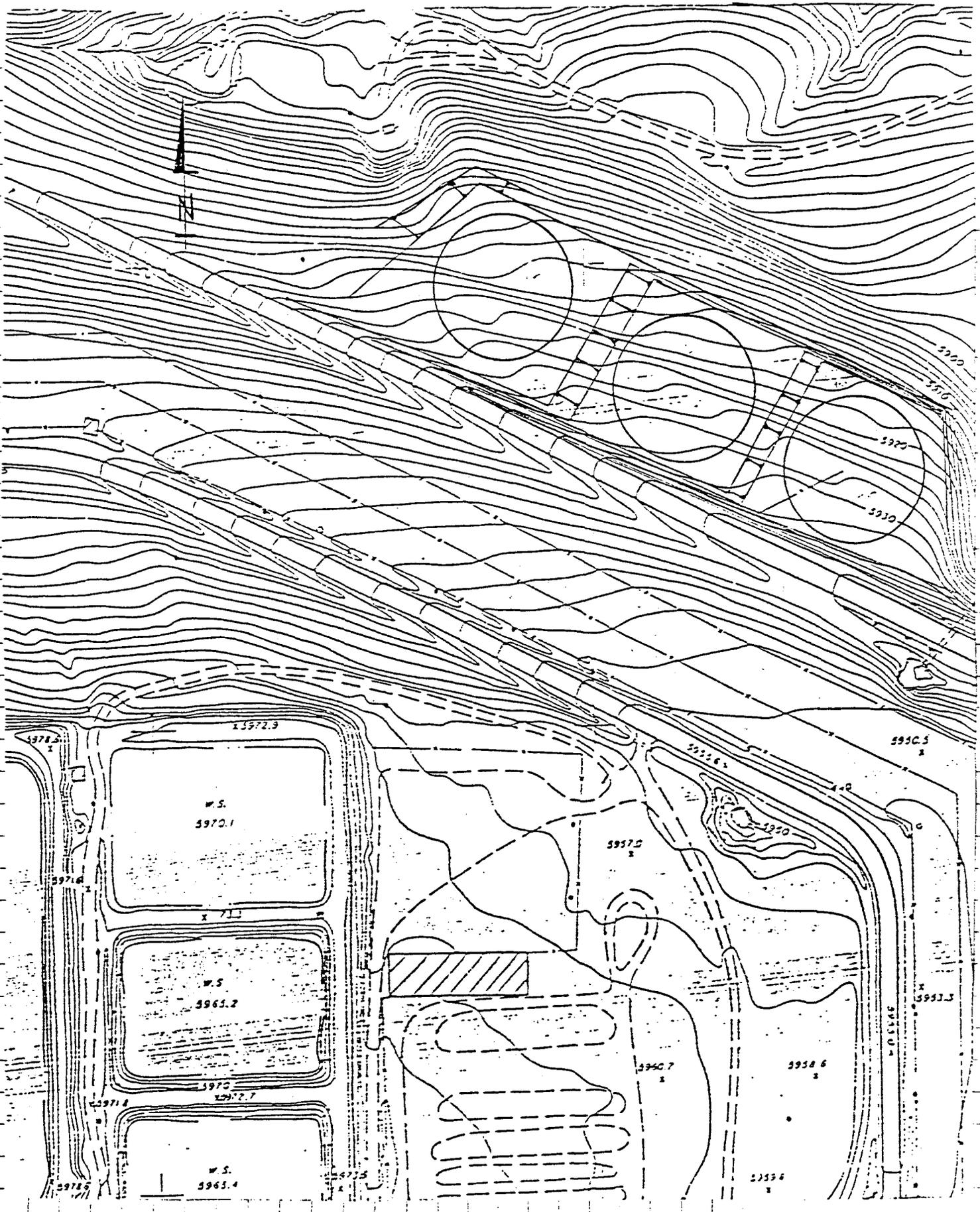


CONCEPTUAL TEMPORARY TANK LOCATION

NOT TO SCALE

SRK 1-23-91

REVIEWED FOR CLASSIFICATION/UCMII
 By *[Signature]*
 Date *Jan 23, 1991*



REVIEWED FOR CONSTRUCTION PERMITS
 By James M. Adams **CONCEPTUAL TEMP TANK LOCATION**
 Date Jan 23, 1991 APPROX SCALE: 1" = 282' S.R.K. 1-23-91

PLANNED REPAIRS TO FRENCH DRAIN

- SOUTHERN MOST FRENCH DRAIN REPAIRS BY MID FEB 91
- HILLSIDE AREA IN PSZ WILL BE FENCED BY MID FEB 91 TO PREVENT TRAFFIC FROM DISTURBING DRAINAGE
- AREA RESEEDDED FOR PROPER DRAINAGE
- PUMP HOUSE MAINTENANCE (POSSIBLE NEW IMPELLERS) FOR INCREASED CAPACITY

PROPOSED PERMITTING STRATEGY

- REQUEST FOR CHANGE TO INTERIM STATUS SUBMITTED- WATER IN PONDS
- PERMIT NOT REQUIRED FOR MANAGING WATER FROM FRENCH DRAIN OR OTHER ER ACTIVITIES
- OPTION TO INCORPORATE ALL WATER MANAGEMENT AND SLUDGE MANAGEMENT IN CLOSURE PROCESS OR INTERIM REMEDIAL ACTION

OTHER POTENTIAL TANK/EVAPORATOR USES

- WATER FROM OTHER PLANT ER ACTIVITIES

ATTENDANCE

<u>NAME</u>	<u>ORGANIZATION</u>	<u>PHONE</u>
Joe Wienand	DOE - Rocky Flats	966-5926
KIRK TICKNOR	EG + G - Rocky Flats	966-6344
HARLEN AINSWORTH	CDH	331-4977
Randy T Oges	EG + G	966-7079
Michael Arault	EG + G	966-4294
JUDY BRUCH	CDH - RFPU	331-6735
Jeb Love	CDH - RFPU	331-4771
Norman Matsum	CDH	331-4920
Ernest F Lombardi	EG + G	966-7298
Fred Dowsett	CDH	331-4850
Gary Baughman	CDH	331-4847
Dellie Spear	CDH	331-6738
Arturo Duran	EPA	294-1133
MARTIN HESTMARK	EPA	294-1134
Bob Shankland	EPA - Permits	293-1597
DON FERRIER	EG + G	966-6456