

INTEROFFICE CORRESPONDENCE

DATE January 31, 1990 750&904-90
TO A.H. Burlingame
FROM G.L. Potter
SUBJECT WATER MANAGEMENT AT THE 750 AND 904 PADS

As a result of the recent incident at the 904 Pad in which precipitation being collected from the pad was inadvertently released outside of the pad's bermed area, you requested guidance on the requirements for managing precipitation on the pads.

The Colorado Hazardous Waste Regulations define the pads as container storage areas as opposed to surface impoundments. As such, the regulations do not require management of precipitation on the pads. However, the regulations do require that containers of waste are managed in such a way that their contents are not released to the environment; i.e., deteriorating or leaking containers must be immediately repackaged.

Because a number of the waste containers are known to have leaked on the pads in the past, we recommended and subsequently initiated sampling and analysis of precipitation on the 904 and 750 Pads. Results of analysis indicate elevated levels of nitrates and gross alpha radioactivity in the water from both pads. Water on the 904 Pad is amenable to collection, storage and treatment due to the pads slight slope and availability of a portable tanker and treatment capacity in Building 374. A program has been in place to collect and treat this water in order to minimize adverse environmental impacts to the B-series ponds (the run-off from both pads eventually end up in the B-series ponds). Collection, storage, and treatment of the water from the 750 Pad is still needed but has not been implemented.

Since we continue to see elevated levels of nitrates and gross alpha radioactivity in waters from both pads, we recommend that water from the pads be collected and treated in Building 374.

ALS:dkf

cc:
M.B. Arndt
R.V. Bynum
K.B. McKinley
F.P. McMenus
A.L. Schubert

ADMIN RECORD

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REVIEWED FOR CLASSIFICATION/UCNI
BY G. T. Ostrowski
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