

# **NOTICE:**

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The Administrative Record Staff



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Ref: HWM-PF

MEMORANDUM

TO: Mark Van Der Puy (DOE)

FROM: Bill Fraser (EPA) *WLF*

SUBJECT: Comments on Draft Outline for the Ponds IM/IRA

I have reviewed the subject document and discussed it with Bob Shankland. In general EPA supports those comments submitted by CDH. In particular we want to second the motion that the "mind set" of maintaining the current non-discharging vs. discharging pond setup reflected in the document organization be dropped. If that is the best way to manage things, the alternatives analysis will demonstrate it, but we should start with a clean slate and an open mind. We would also like to add the following to the CDH comments.

General Comments

1. Chapters 1 and 2 should be brief, and limited to relevant material. We only need to lay the foundation for a decision, not repeat everything that is known about the site and the drainages. Pertinent sections of workplans and other documents could be briefly summarized and/or referenced.
2. While we agree with CDH that discussion of the "Option B" project is inappropriate here, the commitment made under the associated "Option J" to maximize recycling and limit discharges from the plant to the drainages must be factored into the pond management program. Very little mention is made of recycling, and it may deserve a bit more emphasis.

Specific Comments

1. Section 2.3 doesn't seem to mention Ponds B3 and B4; they need to fit in somewhere.
2. Section 2.6 appears to deal with water quality and monitoring, not management as the title would indicate.
3. Section 4.1.1 should refer to Federal (CWA) Ambient Water Quality Criteria, not Standards.
4. Section 5.3.2 may need to include consideration of treatment technologies for limiting ammonia and nitrate levels in the ponds due to STP discharges.

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5. Section 6.1 needs to include a discussion of the monitoring and reporting scheme which will be employed to demonstrate and ensure compliance.

6. Section 7.1 looks a good deal like "excuses for failure" we should talk about the wisdom of including this and what DOE feels needs to be said here.

cc: Norma Castaneda (DOE)  
Gail Hill (DOE)