

# STATE OF COLORADO

## COLORADO DEPARTMENT OF HEALTH

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December 21, 1990

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Roy Romer  
Governor

Thomas M. Vernon M.D.  
Executive Director

Gentlemen

Attached are the Colorado Department of Health, Hazardous Materials Waste Management Division, ( The Division ), comments on the Draft Treatability Studies Plan submitted September 21, 1990

The purpose of writing a Draft Treatability Studies Plan is to screen both practical conventional and innovative technologies to determine the technologies which need the additional information gained by performance of treatability studies. The screening process is a comprehensive literature search on each technology, followed by application of appropriate Rocky Flats contaminate levels and types which should result in the elimination of some technologies as being inappropriate for Rocky Flats and other technologies for having sufficient information available to eliminate them from the treatability study process. The Division finds it difficult to believe that only three technologies have sufficient information available to eliminate them from the 'treatability study' process. The major flaw in the screening process used by DOE and EG&G is that the 'Procedure for technology selection and screening' Figure 5-1 page 5-2 is not an accurate interpretation of the screening process outlined in the EPA Guide for Conducting Treatability Studies Under CERCLA EPA/540/2-89/058, page 9 Figure 2. A copy of both flow diagrams is attached. The rearrangement and addition of steps in the selection and screening process results in performance of treatability studies for almost every technology. In fact, only three of the twenty-two practical standard conventional technologies evaluated are judged to have enough information available to avoid treatability studies.

DOE's screening process substitutes 'Evaluate existing site data with Site characterization data', the difference being that all the site characterization data will not be available for several more years. The DOE screening process adds 'Identify potential ARAR's', of which there is no mention in the IAG Statement of Work definition of Treatability

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Study. The biggest hole in the DOE screening process is opened by the replacement of "Search Literature to determine data needs", with DOE's Determine Data needed for screening'. By not performing a comprehensive literature search before identifying data gaps almost every technology must fall into the 'Conduct Treatability Study' block.

In addition, the Interagency Agreement (IAG), Statement of Work, page 39 XI Treatability Study states, Within the Treatability Study Plan, DOE shall submit information on performance, relative costs, applicability, removal efficiencies, operation and maintenance requirements, and implementability of candidate technologies in addressing the below listed general types of waste. Each of these six parameters must be addressed for each of the candidate technologies. The information submitted in the Appendix C Technology Data Sheets is incomplete.

There are no innovative new technologies screened in the plan. EG&G's two phase approach is not acceptable to the Division. At a minimum, all of the technologies currently under review by the DOE's Office of Technology Assessment should be included in the Treatability Studies Plan.

The "Division" will not approve the Final Treatability Studies Plan unless the above concerns are addressed.

If you have any comments regarding our comments please contact Noreen Matsuura at 331-4920.

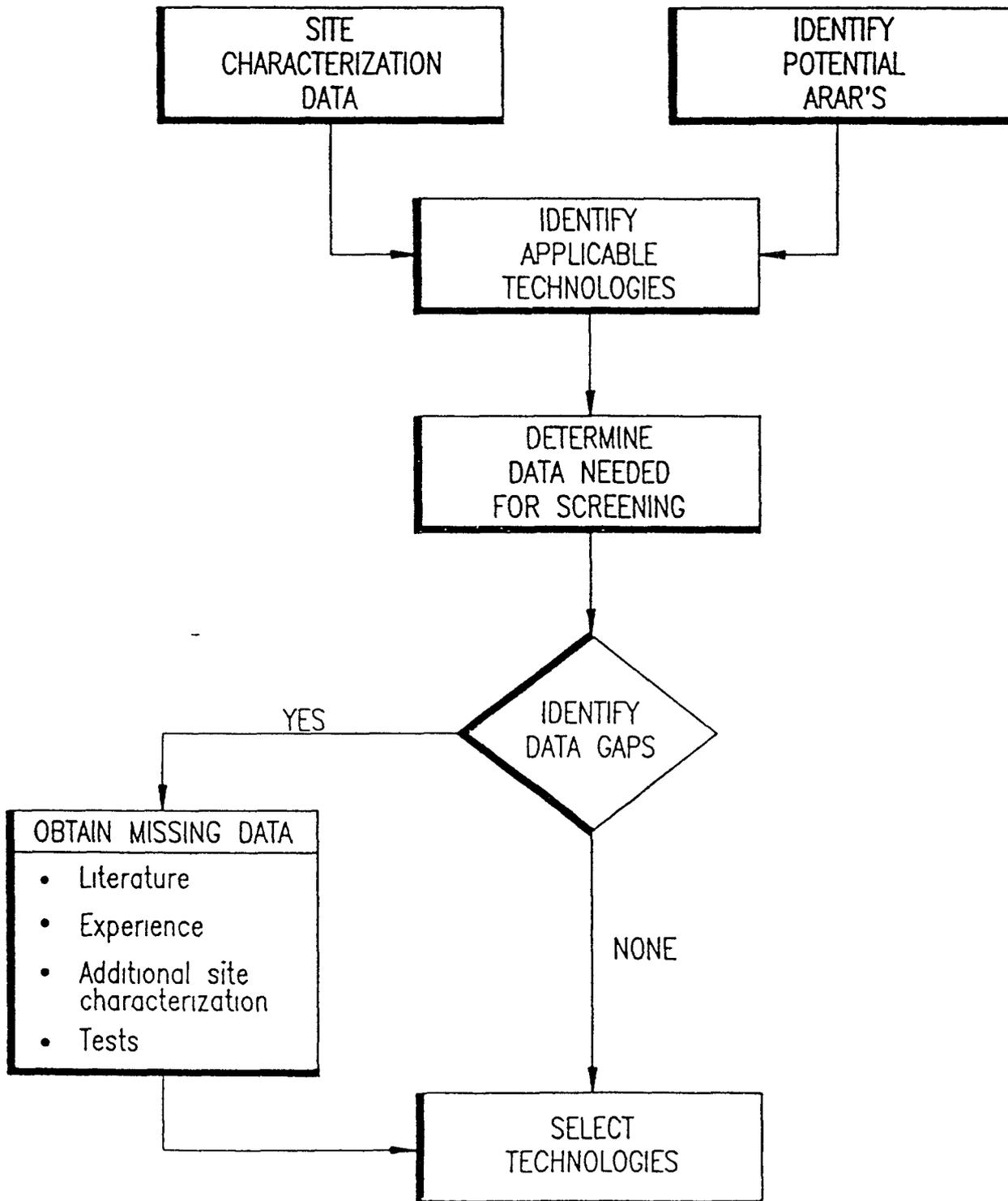
Sincerely,



Gary W. Baughman  
Unit Leader  
Hazardous Waste Facilities  
Hazardous Materials and Waste Management Division

cc Thomas T. Olsen, DOE  
Scott Grace, DOE  
Tom Greengard, EG&G  
Gary Anderson, EG&G  
Martin Hestmark, EPA  
Arturo Duran, EPA  
Teresa Hampton, AGO

# FIGURE 5-1 TECHNOLOGY SELECTION AND SCREENING PROCESS



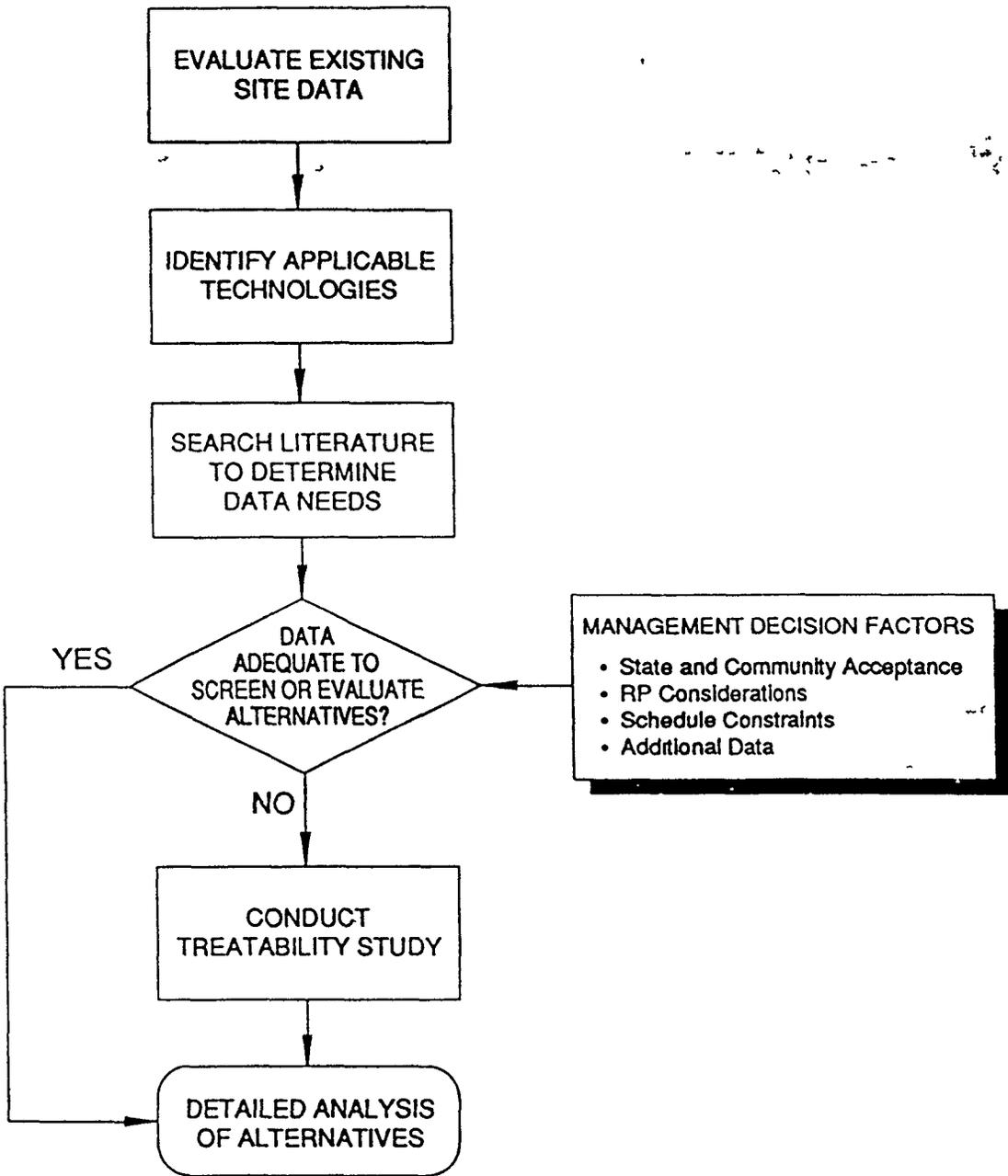


Figure 2 Decision tree showing when treatability studies are needed to support the evaluation and selection of an alternative

Block Diagram from EPA Guide for Conducting Treatability Studies Under CERCLA EPA/540/2-89/058 page 9.