

Colorado Department of Health  
Hazardous Materials & Waste Management Division

Comments

on

DRAFT

WORKPLAN FOR

CONTROL OF RADIONUCLIDE LEVELS IN

WATER DISCHARGES FROM THE ROCKY FLATS PLANT

APRIL 5, 1991

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**Section 1.0:** In the 1st paragraph, page 1, reference is made to the " Work Statement, Attachment 1". The Statement of Work of the IAG is Attachment 2, Attachment 1 is a map of the IHSSs. Please amend this section to eliminate possible confusion for individuals less familiar with the agreement.

In the 2nd paragraph, page 1, reference is made to "Section XII of the IAG. Please revise text to indicate that Section XII is within the Statement of Work, Attachment 2, of the IAG. Again this will avoid confusion.

**Section 2.4.1:** In paragraph 1, page 9, the statement is made that the Rock Creek drainage is "generally unimpacted by plant operations or potential contaminant releases to surface water". The swirling and diurnal winds of the Rocky Flats site may have deposited contaminants onto the surface of this drainage; consequently, until scientific or statistical data are presented to the contrary, it is appropriate to address this as an issue within this workplan.

In the last sentence, 2nd paragraph, page 11, please indicate the year as well as the month that the largest flow was observed.

**Section 2.4.2:** Please amend Figure 2.5 to show the routes of the Upper Church, McKay, Kinnear and Reservoir Co. ditches. The figure shows Church Ditch, does this differ from Upper Church Ditch?

**Section 3.1.1:** Regarding the 1st bulleted item, page 20, how are pool elevations equivalent to a 10% capacity determined, is there a level marker? What effect does sediment volumes have on the ability of the terminal ponds to meet the 90% reserve holding capacity requirement of the NPDES permit? Will sediment be removed periodically, or on a scheduled basis, to maintain the 90% factor.

ADMIN RECORD

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Section 3.1.2: Paragraph 2, page 21, discusses the management practices and uses of ponds. A chart showing pond capacities, pond uses and decision criteria for water transfers etc. is needed to simplify this and similar discussions.

Section 3.2.2: Paragraph 2, page 26, refers to "substantiating the absence of contaminants" as a prerequisite for water release. Contaminants must be within CWQCC standards not totally absent.

Section 3.2.6: On page 33 it is stated that "EPA approval to convey the Pond C-2 (water) to BDD" has ended. Where will the C-2 water be directed now, or later, under the work plan?

Section 3.2.7: In the 2nd paragraph, page 33, the option of recirculating to the source pond is presently used. Please clarify that the proposed option is also the current option.

Section 3.4.1: The bulleted items on page 44 make reference to a filter press. Where, and how, are treatment wastes or residues disposed?

Section 3.4.2: Item 2, page 45, discusses a significant reduction of plutonium and americium levels. Please provide quantitative versus subjective descriptions of the reduction.

Section 4.1.3: Does the model, scheduled for completion in the 2nd quarter 1992, account for sediment infilling of the ponds and subsequent impacts on pond capacities? The 90% reserve holding capacity of the terminal ponds, in respect to actual determinations of the 20% action level could be seriously affected by sediment infilling.

Section 4.1.5: In paragraph 1, page 50, it states that RFP will develop a sampling program. The sampling program must be incorporated into the workplan as a SOP to direct current and future sampling personnel. If adequate and appropriate the sitewide SOPs may be referenced; a SOPA (SOP Addendum) may be necessary. A sampling program cannot be an objective of the workplan but a component of the plan.

In paragraph 2, page 50, it is stated that "Each composite sample will be collected in sufficient volume...". Sample volumes must be addressed within a SOP as discussed above.

Section 4.1.6: Please explain specifically how "running 30-day average(s)" are calculated. (Explain, to the benefit of the public, that 30 consecutive days of data are not required.)

Section 4.1.8: Under the Pond Water Discharge Plan, Item 3, please clarify the following procedure. Will water discharges exceeding a standard be routed to treatment for continued discharge or will all discharge be halted immediately?

Section 4.2.2: The methods, page 57, for sampling of pond and discharge waters must be a section in this workplan, not an objective of the plan. These methods will be subject to review and approval.

Section 4.4: Treatment options, page 61, will have to be incorporated into the plan as developed.