

Comment 1

Section 2 5 3 The last sentence, first paragraph, regarding Segment 5, is incorrect and the classification of Segment 4 should be added. Acceptable replacement text is: Classifications of Segment 4 and Segment 5 are aquatic life, warm water (Class 2), water supply, agricultural and recreational Class 2.

Response 1

The text has been replaced as suggested.

Comment 2

Section 4.2.3.2: In reporting accidents or incidents, DOE must include remediation activities that may contribute radionuclide contamination to the surface water system. For example, earthwork could be impacted by heavy precipitation/runoff or high wind erosion before DOE is able to protect or containerize soils. Such an event may potentially contribute radionuclides to water that has been characterized under pre-release sampling procedures. Should this type of event occur, DOE must notify CDH to allow a determination of the validity of the pre-release water quality data. DOE must, at all times, maintain coordination and communication between individuals or groups responsible for the performance of this work plan and the individuals or groups responsible for remediation activities to ensure reporting of such incidences. These coordination and communication activities should be incorporated into the work plan.

Response 2

RFP will notify CDH if there is an incident which could cause the potential for the transport of radionuclides to surface waters from erosion caused by remediation activities. The mitigating or corrective actions and emergency responses for remediation activities or any other spill or release incidents, are described in the following RFP documents: *Plan for Prevention of Contaminant Dispersion, effort in progress*, *Spill Prevention Control Countermeasures and Best Management Practices (SPCC/BMP) Plan, under revision*, *EG&G Rocky Flats Plant Hazardous Waste Requirements Manual, Section 4 0, Response & Reporting Procedures, in progress*, *Procedure for Containment of Spills Within the Rocky Flats Drainages, in progress*, *Occurrence Categorization Procedure 1-15-200-ADM-1602 (EG&G 1992)*, *Emergency Classification 1-15-200-EPIP-04 01 (EG&G 1992)*, *Occurrence Notification Process 3-15-600-EPIP-04 02 (EG&G 1991)*, and *Rocky Flats Plant Emergency Plan (EG&G 1991)*.

Concurrent with the notifications made to CDH, per the above discussion, RFP will make similar notifications to EPA and to local municipalities. RFP will also notify CDH, EPA, and local municipalities of significant changes in its discharge regime resulting from changes in operational or remediation factors.

ADMIN RECORD

A-SW-000352

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Comment 3

Section 4.2.3.4. DOE has assumed that an exceedance of the 30-day moving average may occur on an occasional basis and can be addressed through "appropriate measures" DOE apparently has not considered what measures would be taken in the event the average is exceeded on a continual basis and pond levels continue to increase DOE must be as specific as possible on the appropriate measures that would be used to alleviate this potential condition since remediation activities could contribute to increased radionuclide levels in surface waters Emergency release procedures should not be the final answer to non-attainment of CWQCC standards for radionuclides

Response 3

Currently, the 30-day running averages are well below the stream standards for radionuclides on untreated pond water samples If the 30-day averages on the untreated samples for the radionuclides should exceed the stream standards RFP will consider treatment of discharges and consult with CDH regarding the proper course of action Since there are no technologies available to remove radionuclides at the sub-picocurie level, on-going treatability studies are being performed to identify possible treatment strategies to lower radionuclide levels as much as technically possible RFP recognizes the importance of attempting to conform to the site-specific stream standards set by the CWQCC The emergency release procedures are in place to prevent uncontrolled releases from the ponds, and to protect the integrity of the pond dams and safety of downstream populations, not to circumvent stream standards

Comment 4

Section 4.4.3.7. The Division welcomes the annual reviews of potentially applicable treatment technologies Additionally, the Division would like the annual review to include an updated and revised schedule comparable to Figure 4 4-2 Likewise, the Division would like annual updates on the progress of improvements to DOE analytical capabilities, schedules for any additional work should be included

Response 4

An update to this Workplan will be a followup report that summarizes the advances in technology and evaluates these advances for potential applicability to RFP based on the need to control radionuclide discharges by application of treatment technology Plans for additional work will be included, as appropriate This followup report will be included as part of the Sitewide Treatability Study Plan (TSP) annual report

Comment 5

City of Broomfield, Item 2. DOE's response to this item regarding the transfer of Pond C-2 water to Pond B-5 is inadequate for two reasons First, the clarifications referred to cannot be found in the paragraphs to which the City of Broomfield made reference (See Sections 3 3 1, 3 3 5 and 4 1 4) Although the Division recalls clarification of this issue elsewhere in the document, the above referenced sections remain contradictory Second, the potential for routing Pond C-2 water to Pond B-5, at any time prior to the abandonment of Great Western Reservoir as a drinking water source, has been ignored Although the water from Pond C-2 currently goes into the Broomfield Diversion Ditch, the City of Broomfield is reserving the right to draw water from Walnut Creek and is not agreeable to water from Woman Creek being diverted into Walnut Creek This concern must be resolved and set forth within the work plan

Response 5

Revisions were made to sections 2 4 3, 2 4 1, 3 3 1, 3 3 4, 3 3 5, 4 1 4, and 4 4 1 1 to clarify Pond C-2 water transfer capabilities. The capability to transfer Pond C-2 water to Pond B-5 is present to maximize DOE's ability to manage water on plantsite and is approved under RFP's National Pollutant Discharge Elimination System (NPDES) Permit CO-0001333. The possibility of a Pond C-2 to B-5 transfer is remote, however, the ability to transfer must be in place if an emergency situation arises and water must be removed from Pond C-2 before pre-discharge data can be obtained. In case of a transfer, the Rocky Flats Program Unit of CDH and the City of Broomfield would be notified in advance. The City of Broomfield would likely exercise their water rights for Walnut Creek only during extremely dry periods or drought, since they do have the capability of receiving additional raw water supplies from the Denver Water Board. Concurrently, in a drought situation, there would be little water present in Pond C-2, and transfers to Pond B-5 would not be necessary.