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OF HEALTH

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May 26, 1992

Mr. Frazer Lockhart
U. S. Department of Energy
Rocky Flats Plant
Building 116
P. O. Box 928
Golden, Colorado 80402

RE: Workplan for Control of Radionuclide Levels in Water Discharges from the Rocky Flats Plant, U. S. Department of Energy, Rocky Flats Plant, Golden, Colorado, January, 1992.

Dear Mr. Lockhart,

On March 2, 1992 the Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division) granted conditional approval to the subject workplan. The Document Review Comment Record (Responsiveness Summary), was reviewed concurrently with the workplan, but not granted specific approval.

On April 15, 1992 DOE provided revised sections to the work plan and a summary of the Division's March 2nd comments along with DOE's associated responses. The Division finds that DOE's response to our comment on Section 4.2.3.2 and to the comment by the City of Broomfield remain inadequate.

Section 4.2.3.2:

Our comment on Section 4.2.3.2 was specifically concerned with remediation activities that may, due to precipitation/runoff, contribute contaminants to the ponds. (If water samples are collected before the event, the analysis results may be invalidated.) DOE's response was to refer to the Plan for the Prevention of Contaminant Dispersion (PPCD) and other "spill" control measures. Unfortunately, the PPCD pertains only to windblown dust resulting from RFI/RI investigations and IM/IRA activities. Neither precipitation events, nor final remediation activities, are covered by the PPCD. Also, remediation activities may not be accorded the same recognition under the spill control protocols; consequently, a precipitation "event", with the potential to invalidate water quality data, may not be reported.

Furthermore, the Division specifically instructed DOE to incorporate "coordination and communication activities" into the work plan. This has not been done. The Division recognizes that EG&G's surface water management personnel will need to be informed of specific events by the environmental restoration group in order to fulfill this requirement. It is this line of communication that must be established and then described in the work plan. Please recognize that events resulting in deteriorated water quality may occur without the occurrence of "significant changes in ... discharge regimes"; seemingly insignificant events may need to be reported.

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Be assured, that it is not the Division's intent nor desire to impose a complex process or the creation of a lengthy internal document. Primarily, our concern is that DOE and EG&G recognize that it is their responsibility, and in their best interest, to report events that have the potential to invalidate water quality data and, thereby, result in the release of water exceeding standards (Section XII of the IAG Statement of Work).

City of Broomfield:

The response to the City of Broomfield comment states that the transfer of water from Pond C-2 to B-5 is approved under the plant's NPDES permit. DOE should clearly state that the NPDES permit does not specifically allow nor does it specifically prohibit the transfer from Pond C-2 to B-5.

In the event of an emergency situation, DOE should also include in the workplan a commitment to sample water as it is being transferred from Pond C-2 to B-5 prior to mixing with B-5 water. The samples should be analyzed, at a minimum, for the radionuclides listed in Section XII.

DOE should formally respond to this letter as soon as possible, but not later than June 26, 1992. DOE should provide revised responses for Division consideration in letter format. Upon approval of the revised responses, DOE will be instructed to update the work plan, with replacement pages, to reflect the resolution of these additional comments. Additionally, the responsiveness summary will need to be updated by removing the unacceptable responses and incorporating approved responses.

DOE may wish to discuss these issues with the appropriate technical staff members. If you have any questions concerning this subject, please contact Harlen Ainscough of my staff at 331-4977.

Sincerely,



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

cc: Daniel S. Miller, AGO
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