

CORRES. CONTROL
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92RF8130

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

July 16, 1992

92-RF-8130



000022273

Terry A. Vaeth
Manager
DOE, RFO

Attn: J. K. Hartman

RESPONSES TO COMMENTS ON THE DRAFT 1991 ANNUAL SITE ENVIRONMENTAL REPORT -
JMK-0683-92

Ref: J. K. Hartman ltr (7344) to J. M. Kersh, Comments on the Draft 1991 Annual Site
Environmental Report, July 1, 1992

Per your July 1, 1992, request, my staff has compiled responses to comments received from your
office on the 1991 Annual Site Environmental Report for the Rocky Flats Plant (RFP). Enclosed
with these responses is a replacement copy of the entire report.

In addition, Section 3.6, Ecological Studies, has been modified as a result of a meeting on July 10,
1992, among EG&G Resources Information Management Division, Ecological and NEPA Division,
and Cliff Franklin of your staff.

If you have any questions regarding this information, please contact D. B. Costain of my Resources
Information Management Division (x8528).

J. M. Kersh, Associate General Manager
Environmental & Waste Management

DBC:clc

Orig. and 1 cc - T. A. Vaeth

Enclosures:
As Stated (2)

cc:
T. Lukow

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IN REPLY TO REFERENCE NO:
3471-2A-192

CTR EM STATUS
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3431

Enclosure I

1. *Page xiv, 1st para., 1st line: This line should include some reference to the NESHAP Compliance Order that RFP received.*

For clarity, the referenced paragraph has been divided into two paragraphs and revised to read:

The Environmental Protection Agency's (EPA) National Emissions Standards for Hazardous Air Pollutants (NESHAPs) set a yearly limit of 10 millirem per year (mrem/yr) effective dose equivalent (EDE) to any member of the public. Radionuclide air emissions from RFP are within the required limits.

The RFP's radionuclide emissions monitoring systems are not in full compliance with EPA's monitoring requirements; however, the currently existing monitoring deficiencies are not likely to cause emissions to be underestimated. RFP is responding to a Compliance Order (issued to RFP by EPA Region VIII) that requires compliance with the effluent monitoring requirements of 40CFR61.93(b).

2. *Page xiv, 1st para.: After last sentence please add "The RFP's radionuclide emissions monitoring systems are not in full compliance with EPA monitoring requirements. However, the deficiencies are not likely to cause emissions to be underestimated."*

See response to comment #1.

3. *Page xiv, 4th para., last line: The October 1991 date should be changed to December 1991.*

Text has been revised as requested.

4. *Page xiv, 5th para., 2nd line: If there is a definite date to replace "in a timely fashion" it should be placed here, or this statement removed.*

The statement has been removed.

5. *Page xiv, 5th para., last sentence: Please replace NOV with Notice of Violation.*

Text has been revised as requested.

6. *Page xiv, 7th para.: Add to the end of this paragraph the following: "A second draft is expected by July 1992 and a final SPCC/BMP by October 1992."*

Text has been added as requested.

7. *Page xiv, 8th para., 2nd line: "Segment 5" should be defined or explained; in addition, Segment 4, used later, should also be defined.*

The paragraph has been revised to read:

In September 1991, the Colorado Water Quality Control Commission (CWQCC) agreed to hear a petition by DOE to reconsider the classification of Segment 5 (which includes tributaries from source to Ponds A-4, B-5, and C-2) of Big Dry Creek. Segment 5 is currently subject to narrative temporary modifications and goal qualifiers; this indicates that the waters are

presently not fully suitable but are intended to become fully suitable for classified use. The CWQCC must take action on these standards before February 1993, or standards now established for Segment 4 (from pond outlets to Standley Lake and Great Western Reservoir) will apply to Segment 5. The hearing is scheduled for October 1992.

8. *Page xiv, 8th para., 3rd line: Replace "goal Standards" with "narrative temporary modifications and goal qualifiers."*

Text has been revised as requested.

9. *Page xiii, 5th para., 2nd line: The acronym "FONSI" should be spelled out the first time.*

Text has been revised as requested.

10. *Page xv, 2nd para., 3rd line: This sentence should specify how much waste is being stored beyond the 1-year limit.*

Text has been added as requested.

11. *Page xv, 6th para.: These OU titles should include the OU number. For example, Evaporation Ponds (OU4).*

Text has been revised as requested.

12. *Page xvi, 6th para., 1st line: Change "... substances of CERCLA..." to read "... substances or CERCLA...."*

Text has been revised as requested.

13. *Page xvii, 2nd para., 1st line: After "Toxic Chemical Release Inventory" add (Form Rs).*

Text has been revised as requested.

14. *Page xviii, Surface Water Monitoring Tables: Consider converting the units in these tables to the generally acceptable conventional terminology. For example, pCi/L is generally used instead of uCi/ml.*

DOE "Guidance for the Preparation of Site Environmental Reports for the Calendar Year 1991" states that environmental measurements should be reported in units established by DOE Order 5400.1, Attachment II, Section 8d. Reporting surface water concentrations in units of uCi/ml is in compliance with that order; therefore, text has not been modified to units of pCi/L as suggested.

15. *Page xxi, 3rd para., last sentence: There should be some clarification of this sentence. Highest concentrations compared to what? What was that concentration?*

Text has been revised to read:

Of the soil samples taken, those from the eastern portion of the buffer zone recorded the highest plutonium concentrations: site 1-090, 1.49 pCi/g; site 1-108, 9.76 pCi/g; site 1-126, 2.13 pCi/g; and site 2-090, 3.61 pCi/g.

16. *Page 1, 1st para., last sentence: The word "operations" is not spelled correctly.*

Spelling has been corrected.

17. *Page 14, 6th para., 3rd line: The sentence "... subject to "goal" standards, a qualifier that ..." should be changed to read "... subject to narrative temporary modifications and goal qualifiers that"*

Text has been revised as requested.

18. *Page 14, 6th para., 5th line: After the sentence "... classified use." the following sentence should be added: At the October meeting, DOE/EG&G will ask for an extension of these goal qualifiers and temporary modifications and to revise the site-specific organic standards to achieve consistency with the statewide numeric standards for organic chemicals.*

Text has been revised as requested.

19. *Page 15, Compliance Issues Section top of page: There should be a discussion of the Cross-Connection Control Program in this section.*

The following text has been added as requested.

In May 1990 the RFP established the Cross Connection Control Program to meet commitments made by the DOE to the CDH to ensure that RFP fully complies with the Colorado Primary Drinking Water Regulations (CPDWR) pertaining to cross connections. A cross connection exists when a drinking water supply is connected to a possible source of contaminated water without an approved backflow preventor device to stop backflow or backsiphonage of polluted water into the drinking water system. During 1991 the RFP was not in compliance with the CPDWR regarding cross connections; however, work on the program is continuing and EG&G Plant Engineering has made the commitment to provide semiannual progress reports to the CDH.

20. *Page 15, 5th para., 6th sentence: The sentence "... regulatory provisions." should be changed to read "... regulatory provisions, including some wastes subject to land disposal restrictions."*

Text has been revised as requested.

21. *Page 35, 2nd para., 4th line: The sentence "The wind...at night" should be changed to read "The wind generally blows downslope from the mountains to the plains at night; however, daytime wind directions are non-preferential (Fig. 3.1-4)."*

Text has been revised as requested.

22. *Page 41, 2nd para., last line: Shouldn't this year be 1991 instead of 1990?*

Date has been corrected to 1991.

23. *Page 62, 1st para., 6th line: The sentence "Carbon adsorption facilities..." should be changed to "Carbon adsorption and filtration facilities...."*

Text has been revised as requested.

24. *Page 62, 2nd para., 5th line: The "C-1" in this sentence and the next sentence should be "C-2."*

Text has been revised as requested.

25. *Page 62, 2nd para., last line: This sentence should be broken with a period after "... tritium." and the new sentence should read "Daily samples are composited weekly for plutonium, uranium and americium analysis."*

Text has been revised as requested.

26. *Page 63, 3rd para., 3rd line: Change sentence "... data collection rather than characterization..." to read "data collection and additional characterization...."*

Text has been revised as requested.

27. *Page 64, Table 3.3-2: Item Discharge 007 states that there was no discharge in 1991; however, Table 3.3-3 shows results from samples taken during discharge in 1991.*

As shown in their titles, Table 3.3-2 reflects discharges from January through April 1991 and Table 3.3-3 reflects discharges from April through December 1991. For further clarification, Table 3.3-2 text for Item Discharge 007 has been revised to read: There were no discharges January through April 1991.

28. *Page 76, 2nd para., 4th line: This sentence should be dropped; there are some serious questions as to whether caliche layers are developed in this manner. In addition, the caliche layer at RFP is often not impervious and definitely not continuous.*

Referenced sentence has been deleted.

29. *Page 76, Table 3.4-1: Proper scientific notation should be used on this table; e.g., 1×10^{-5} .*

Table has been revised as requested.

30. *Page 78, last para., 1st sentence: Monthly water level measurements have been changed to quarterly measurements.*

Text has been revised as requested.

31. *Page 79, Table 3.4-3: Fluoride is missing from this list.*

Fluoride has been added to the list.

32. *Page 79, Table 3.4-3: Footnote e states that dissolved radionuclides replaces total ...; however, total Pu and Am were collected starting in 3rd quarter 1990.*

Footnote e has been modified to read:

Dissolved radionuclides replaces total radionuclides (except tritium) beginning with the third quarter 1987; however, total Pu and Am were collected starting in third quarter 1990.

33. *Page 79, Table 3.4-3: Under "NOTES" it states that phosphates were analyzed in 1986 only; however, orthophosphates were analyzed in 1990 and 1991.*

Text has been modified to read:

Total suspended solids and phosphates were analyzed in 1986 only; orthophosphates were analyzed in 1990 and 1991.

34. *Page 133: Haven't there been any activities that occurred in 1991 for OUs 12 through 16 that can be shown here? This reflects a relative lack of progress.*

Initial remedial investigations for OUs 12 through 16 were originally scheduled to begin at the end of 1991 but were deferred to 1992 because of budget uncertainties; therefore, text has not been modified.

35. *Page 149, 4th para., 3rd line: The sentence "to reflect actual potential..." should read "... to reflect potential...."*

Text has been revised as requested.

36. *Page 197, Table B-5: Remove the subtitle "As Amended - October 30, 1991." RFP standards have not officially been amended until the October 1992 hearing.*

Subtitle has been deleted as requested.

37. *Page 197, Table B-5: These standards are actual standards for Segment 4 of Big Dry Creek and are goal qualifiers for Segment 5 of Big Dry Creek. Therefore, the subtitle "Goal Standards, Segment 5 of Big Dry Creek" is not correct.*

Subtitle has been changed to "Goal Qualifiers, Segment 5 of Big Dry Creek."

38. *Page 197, Table B-5: Since the units column is in mg/l the standard for mercury is .00001 mg/l rather than .01.*

Text has been revised as requested.