0021892 (P)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII
1860 LINCOLN STREET
DENVER COLORADO 80295

000025295

REF: 8E-PC

Mr. Earl W. Bean
Assistant Area Manager for Operations
Department of Energy
Rocky Flats Area Office
P. O. Box 928
Golden, Colorado 80401

RE: NPDES Permit No. CO-0001333 and Surface Water Control Plan for Rocky Flats

Dear Mr. Bean:

A copy of the drawings for the surface water control facilities presently being constructed at Rocky Flats was obtained by Bob Shankland of my staff to provide background information to be used in developing the renewal NPDES permit (CO-0001333) for the Rocky Flats Plant. In looking over these drawings it is apparent that the three dams, A-4, B-5, and C-2, do not have impermeable cores and that there would be no dead storage areas behind the dams, where sediment could accumulate. It is our understanding that the dams were designed on the basis of providing only temporary storage of water and that the surface water control plan for Rocky Flats calls for the release of water from behind the dams as soon as the monitoring of the water and/or other information indicates that the water is of suitable quality for release downstream.

Would you please provide us with the following information regarding the three dams and the surface water control plan.

1. What was the basis of designing the three dams for only temporary storage of water? Did the bedrock conditions at the dam sites influence the decision to design the dams for temporary storage of water? If yes, please explain how.

2. What is the maximum length of time that water should be stored behind each dam without requiring a detailed inspection of the dam. Did the design criteria for the dams specify minimum and/or maximum storage times? If yes, please explain.

ADMIN RECORD

SW-A-002979

3. Will the monitoring program for the water retained behind the dams be able to detect the presence of significant concentrations of pollutants that settle out with the sediment washed into the reservoirs? Plutonium is an example of a pollutant that would tend to accumulate in the sediment rather than be dissolved in the water.

4. It is our understanding that field studies will be conducted with the pilot reverse osmosis unit to determine the feasibility of using a reverse osmosis unit to treat any contaminated waters that might be retained behind any of the dams. What are the interim plans for treating or disposing of any contaminated waters that might be retained behind any of the dams?

5. What are the plans for retaining and disposing of any contaminated sediment that settles out behind any of the dams? With the present design it appears that contaminated sediment could be flushed through the outlet works when water is drained from behind the dam. If this occurs it would negate one of the system's purposes which is to control the spread of surface contamination from existing sources or emergency episodes.

6. Can the pool area behind each dam be safely modified to include a dead storage area for the accumulation of sediment? If the answer is no, please explain why. If the answer is yes, please describe what measures are being taken to incorporate the necessary modifications into the project.

We would appreciate your prompt response in providing the above information. If you have a question regarding the above, please contact Bob Shankland of my staff at telephone 837-4901.

Sincerely yours,

Roger E. Frenette
Chief, Permits Administration
and Compliance Branch
Enforcement Division