

APR 23 1990

J Kersh

2

4 Assuring any discharge of water from the Rocky Flats Plant (RFP) are safe

We need to be able to demonstrate that water discharges from RFP are safe. That demonstration needs to be done in comparison with some standard. The National Pollution Discharge Elimination System (NPDES) permit effluent limits and Water Quality Control Commission (WQCC) standards should be used for this purpose. Alternatively, we can develop health based standards for the complete list of WQCC standards specific to a variety of potential beneficial uses (drinking water, irrigation, recreation, etc.) Any decision related to alternate standards should be based on consideration of all factors related to water discharge. In support of any proposed revision to WQCC standards, a comparison of RFP effluent to upstream or offsite water quality would be required.

5 Development of discharge systems that are sensitive to societal concerns.

As you know, the cities have proposed the purchase of Great Western Reservoir and the construction of an additional dam and diversion around Standley Lake. In order to be successful, the RFP plan needs to consider the cities proposal and develop recommendations with regard to adoption, modification, or alternative discharge options. Also, if Objective 4 is met, discussion of alternatives must evaluate the need for such a diversion both in terms of the risks associated with water use and overall societal concerns.

RFO wishes to involve the cities, state, EPA, and general public in the development of this plan. Accordingly, provisions should be made in your planning for the development of a small oversight group, periodic progress briefings to the RFWMG, briefings to the Rocky Flats Environmental Monitoring Council, and opportunity for public comment.

As discussed with our staffs, please prepare a WMP schedule which addresses, as a minimum, all of the above planning issues by May 4, 1990. Because this represents a major change of effort from that described in your March 23, 1990, proposal, we would like to meet with you to discuss this matter in your office at 1:00 p.m., April 25, 1990.

Please feel free to contact me or Tom Lukow of my staff on extension 4561 if you have any questions.


Jack R. Roeder, Acting Assistant Manager for
Environmental Management

Attachment

cc w/o Attachment.
D P Simonson, RFO
M. E Van Der Puy, RFO
-F Hobbs, EG&G

2/20/90

EPD MEVDP 5037

Surface Water Discharges From the Rocky Flats Plant (RFP)

B P Warner
General Manager
EG&G Rocky Flats, Inc

We have received your letter of January 29, 1990, requesting \$15 million for funding of pond water zero discharge options. While we appreciate your eagerness to resolve the controversy surrounding RFO effluent, we are convinced that the various aspects of waste water management should be coordinated and properly planned. Without such integration and planning, we cannot be assured that the actions taken are consistent with NEPA or other regulatory requirements, or optimally use limited funds. Therefore, we cannot approve of your request at this time. Rather, we request that you begin the preparation of a comprehensive waste water management plan (WWMP) for RFP.

Based on recent regulatory drivers, including the draft Federal Facilities Compliance Agreement (FFCA) for past violations of National Pollutant Discharge Elimination System (NPDES) permit requirements, the recently adopted surface water quality standards, letters from the City of Westminster, the Colorado Department of Health (CDH) and the U S Environmental Protection Agency (EPA) addressing concerns about spray irrigation, and the Agreement in Principle, we believe the WWMP should address short, mid, and long term efforts necessary to meet all such drivers. These efforts are defined as follows:

Short Term Efforts Those necessary to obtain CDH approval for release of surface water. Such actions would include obtaining necessary portable treatment units, piping water back to Building 374 for further treatment, etc. Short term efforts would also include provisions for working with the cities and irrigation companies to allow for diversions should the water not meet the new standards (it is unlikely that CDH will allow for discharge of such water unless city concurrence is obtained). If possible, short term efforts would include elimination of spray irrigation.

Mid Term Efforts Those necessary to meet all NPDES permit requirements. Such actions would include sewage treatment plant upgrades and other actions as required in the draft FFCA Remedial Action Plan, including alternatives to spray irrigation.

Long Term Efforts: Those necessary to develop "ideal" waste water management which includes the zero discharge study and consideration of alternatives.

EPD
VanDerPuy bmr
2/09/90

EPD
Wilson
2/ /90

EPD
Gerton
2/ /90

DEP MGR
Simonson
2/ /90

MANAGER
Nelson
2/ /90

3/14

B. P Warner

-2-

As agreed upon by our staffs, you are requested to prepare a draft outline (with the section on short-term efforts completed and a schedule for completion of the WWMP) two weeks prior to the need for pond water release.

On February 8, 1990, you indicated the desire to meet with local community representatives to discuss water quality issues. We request that you coordinate such a meeting with Rocky Flats Office. We suggest that such a meeting include the review of the draft WWMP outline and be timed subsequent to RFO approval of that document. In order to facilitate timely RFO approval, we suggest that the WWMP outline be prepared in close coordination with RFO staff.

Please feel free to contact me or have your staff contact Mark E. Van Der Puy of my staff on extension 2473, if you have any questions.

Robert M. Nelson, Jr.
Manager

cc:
- K. McKinley, EG&G
- F. Hobbs, EG&G

11/1