

# ER/WM&I DDT



000111022

WDS cad 110306 01 06

Activity: IB519712.00 Line Item 3

**Source/Driver** (Name & Number from ISP, IAG milestone, Mgmt Action, Corres Control, etc )

**Closure #** (Outgoing Correspondence Control #, if applicable)

**Due Date**

F Rukavina

**Originator Name**

*G. D. DiGregorio*

G. D. DiGregorio

**QA Approval**

*N.P. Cypher*

N P Cypher

A. M. Tyson

**Contractor Manager(s)**

G H Setlock

**Kaiser-Hill Program Manager(s)**

Document Classification  
Review Waiver Per  
Classification Office

T. G Hedahl

**Kaiser-Hill Director**

**Document Subject.**

KH00003NS1A

TRANSMITTAL - NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM/FEDERAL COMPLIANCE AGREEMENT SEMI-ANNUAL REPORT- AMT-036-97

April 8, 1997

**Discussion and/or Comments:**

The Semi-Annual Progress Report as required under Section V C of the National Pollutant Discharge Elimination System (NPDES) Federal Facilities Compliance Agreement (FFCA) is enclosed for your review. The report covers FFCA activities during the period of October 1, 1996, through March 31, 1997, and is due to the Environmental Protection Agency Region VIII on April 25, 1997. Two draft letters for your use in transmitting the report to DOE and for DOE's use in transmittal to EPA are included.

Please contact Norm Cypher at extension 5782 or Frank Rukavina at extension 7370 if you have any questions.

Attachment  
As Stated

cc  
N P Cypher, RMRS  
F M Huffman, RMRS  
K R Koebel, RMRS  
K M Motyl, RMRS  
F Rukavina, RMRS  
A M Tyson, RMRS  
RMRS Records

**ADMIN RECCRD**

Date

Michael Reed  
U S Environmental Protection Agency, Region VIII  
ATTN Rocky Flats Project Manager, 8HWM-RI  
999 18th Street, Suite 500, 8WM-C  
Denver, Colorado 80202-2405

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM / FEDERAL FACILITIES COMPLIANCE AGREEMENT SEMIANNUAL PROGRESS REPORT AND CONFIRMATION OF RESCOPE**

The enclosed Semi-Annual Progress Report is required under Section V C of the National Pollutant Discharge Elimination System (NPDES) Federal Facilities Compliance Agreement (FFCA) The report covers FFCA activities during the period of October 1, 1996 through March 31, 1997, and is due to the Environmental Protection Agency Region VIII on April 25, 1997

A summary of FFCA related activities during this period follows

Tank Management Plan (TMP) had inspected 95 tanks as of March 20, 1997 The TMP is on schedule to inspect 200 tanks during FY97 The TMP Project Plan has been revised and Building Managers/Tank Owners are reviewing the operational status of all remaining tanks on Site to prioritize tank inspections needed to complete the initial testing and inspection cycle

Construction of the influent and effluent tanks at the Waste Water Treatment Plant (WWTP) is ongoing and expected to be complete in July 1997 as forecast In addition to the planned upgrades, an ultraviolet disinfection process is being installed to eliminate the use of chlorine and sulfur dioxide and to reduce the hazard classification of the WWTP

The Tank Surveillance Procedure, which was put into effect July 20, 1992 to identify leaks or spills from tanks, will be removed from service on April 30, 1997 Completion of the Drain Identification Study and other source control measures such as the TMP and normal building surveillance operations have eliminated the need for a specific tank surveillance walkdowns Historically, the TSP walkdowns proved to be redundant of normal building surveillance operations which include RCRA inspections, general housekeeping sweeps, shift manager fire loading checks performed weekly in each room, fire watch, weekly glove checks, weekly window checks, and utility personnel walkdowns performed three times per day

Attachment 1 is the NPDES Semi-annual Progress Report Questions concerning this correspondence should be addressed to me at (303)966-\_\_\_\_ or John Stover at (303) 966-9735

Name  
Title

Attachment  
As Stated

Enclosure  
As Stated

cc  
N P Cypher - RMRS, B374  
F Rukavina - RMRS, T893A  
G H Setlock - Kaiser-Hil, T130C  
A Tyson - RMRS, T893B

Date

John Stover  
Environmental Compliance, Liaison Division  
DOE, RFFO

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM/FEDERAL COMPLIANCE AGREEMENT  
SEMI-ANNUAL REPORT- GHS-xxx-97**

The Semi-annual Progress Report as required under Section V C of the National Pollutant Discharge Elimination System (NPDES) Federal Facilities Compliance Agreement (FFCA) is enclosed for your review. The report covers FFCA activities during the period of October 1, 1996 through March 31, 1997, and is due to the Environmental Protection Agency Region VIII on April 25, 1997. A draft letter for your use in transmitting the report to EPA is included.

Please contact me at X4457 if you have any questions.

George H Setlock  
Kaiser-Hill Compliance and Performance Assurance

GHS xxx

Enclosure  
As Stated

Attachment  
As Stated

cc

N P	Cypher	-	RMRS, B374
F M	Huffman	-	RMRS, B995
K R	Koebel	-	RMRS, T130B
K M	Motyl	-	RMRS, T893A
F	Rukavina	-	RMRS, T893A
G H	Setlock	-	Kaiser-Hil, T130C
A	Tyson	-	RMRS, T893B

NPDES FFCA  
SEMI-ANNUAL  
PROGRESS REPORT

(Attachment 1)

April 4, 1997

REPORT NUMBER 25

The NPDES Federal Facilities Compliance Agreement (FFCA) Section V C 1 requires quarterly progress reports be submitted to EPA within 28 days following the end of the quarter. This reporting requirement was changed from quarterly to semi-annual in the EPA letter of March 6, 1996 (Ref 8P2-W-P). This report is submitted in response to that requirement, and covers activities during the period October 1, 1996 through March 31, 1997.

FFCA Item	Required Action	Due Date	Status
FFCA Effective Date		March 25, 1991	Complete Signed by DOE Rocky Flats Office, March 19, 1991 Signed by EPA Region VIII, March 25, 1991
Effluent Limitations (Sect I)	Effluent limitations for Outfall 001 apply at the STP discharge rather than Pond B-3. Chromium limitations at Outfalls 005, 006, and 007.	April 1, 1991	Complete Monthly reporting was modified to incorporate revised effluent monitoring requirements. These changes were implemented beginning with the April 1991 Discharge Monitoring Report (DMR).
Effluent Monitoring (Sect II)	Monitoring of STP effluent for volatile organic compounds and metals. Whole Effluent Toxicity (WET) monitoring of the STP effluent, and A-4, B-5, and C-2 pond discharges.	June 30, 1990	Complete Monthly reporting has been modified to incorporate revised effluent parameters and monitoring requirements. These changes were implemented beginning with the April 1991 DMR. Data collected in good faith prior to the signing of the FFCA, between June 1, 1990 and March 30, 1991, were summarized and included with the Progress Report submitted for fourth quarter 1991. Whole Effluent Toxicity (WET) testing of the STP and the terminal ponds was decreased from monthly sampling and analyses to quarterly sampling and analyses per the September 1, 1992 letter to James Hartman signed by Glenn Rodriguez, EPA Region VIII. Quarterly WET testing of the STP and terminal ponds at discharge was implemented October 1, 1992.
Compliance Plan (Sect III A)	Submit a Compliance Plan to EPA to include a diagnostic evaluation of the STP, instrumentation upgrades, sludge drying bed improvements, and influent/effluent containment provisions.	July 30, 1990	Complete Implementation of the Compliance Plan has been initiated (see following)

FFCA Item	Required Action	Due Date	Status
Compliance Plan (Sect III A - continued)	Influent Instrumentation to monitor pH, conductivity, and other STP influent parameters (Compliance Plan Sect II A 1)	May 1990	Complete
	Autochlorination/ Dechlorination (Compliance Plan Sect II A 2)	March 1991	Complete
	Instrumentation to include a Parshall flume, backwash control for sand filters, dissolved oxygen for aeration basin and additional effluent monitoring controls (Compliance Plan Sect II A 3)	December 1991	Complete
	STP Facility Upgrades Phase I Drying Beds Capacity Improvements (Compliance Plan Sect II B)	October 1992	Complete
	STP Facility Upgrades Phase II Miscellaneous utility, equipment and facility upgrades (Compliance Plan Sect II C)	Baseline Completion October 1992 Forecast Completion April 1996	Complete Design engineering was completed in December 1994, and the construction contract was awarded in April 1995 Construction commenced in May 1995 and was completed in April 1996
	STP Facility Upgrades Phase III Influent/effluent containment, nitrification/denitrification (Compliance Plan Sect II C)	Forecast Completion Construction July 97, Project Acceptance & Transfer October 97, Operational Startup December 97	A solicitation was issued on October 3, 1995 for a design-Build subcontract for influent/effluent storage tanks Contract was awarded February 1996, construction was delayed due to the removal of the OJ9 process waste pipeline Construction commenced and completion is anticipated in forth quarter FY97 In addition to planned upgrades, an ultraviolet disinfection process has been added to replace chlorine & sulfur dioxide use
	Perform a diagnostic evaluation of the STP and implement operational recommendations (Compliance Plan Sect II D)		The nitrification/denitrification portion of the project has been canceled because the unionized ammonia standard for the Walnut Creek drainage on plant site was removed  Complete

FFCA Item	Required Action	Due Date	Status
Chromic Acid Incident Plan (Sect III B)	Submit a Chromic Acid Incident Plan (CAIP) to EPA addressing the findings of the Report of the Chromic Acid Incident Investigation at Rocky Flats	November 15, 1990	Complete Implementation of the CAIP has been initiated (see following)
	Tank Management Plan (CAIP Sect 1 1)	Baseline Completion November 30, 1995 Forecast Completion November 30, 1998	The Tank Management Plan is an above ground tank inspection and testing program. An initial inventory of 2685 tanks was completed September 15, 1994. The Master Tank Database currently contains a total of 2824 tanks. The initial testing and inspection cycle began as scheduled on December 1, 1992. To date all but 405 tanks have received visual inspection and/or ultrasonic testing. Tank inspections were not funded during FY96. In FY97 the TMP is funded to inspect 200 tanks, work is on schedule and 95 tank inspections were completed by 3/20/97. Funding to complete the TMP by the forecast schedule will be pursued for FY98.
	Tank Surveillance Program (CAIP Sect 1 2)	December 22, 1992	Complete The Tank Surveillance Procedure (TSP) was effective 7/20/92. The TSP will be removed from service 4/30/97. Completion of the DIS, other source control measures including the TMP and normal building surveillance negate the need for more structured weekly walkdowns.
	Instrumentation Development (CAIP Sect 2 0)	Ongoing	Respirometer Complete Microtox Toxicity Test Complete  Telemetry and Water Quality Reporting Remote monitoring equipment located at ten sites has been collecting and reporting water quality and surface water flow data for some 63 months. Data is used to supplement regulatory reporting requirements for the DMR and the NPDES monthly reports for flow discharge.
	Geotechnical Evaluation of the B-5 Dam Structure (CAIP Sect 3 0)	August 31, 1993	Complete
	Drain Identification Study (CAIP Sect 4 0)	Baseline Completion March 31, 1996 Forecast Completion September 30, 1996 Completed August 30, 1996	Complete The Drain Identification Study (DIS) was a source control program conducted in buildings which contain inappropriate sources of influent to the sanitary sewer system. The DIS rescope excluded low potential risk Buildings from the DIS and was accepted by EPA correspondence on March 6, 1996. Of the Site's 196 buildings the DIS inspected 114 moderate to high risk potential buildings. 71 buildings were excluded from inspection after initial walkdowns and 11 buildings either no longer existed or were exempted as terminal process waste pits.
Groundwater Monitoring Plan for the Sludge Drying Beds (Sect IV C)	Submit a groundwater monitoring plan to EPA for the area beneath the STP sludge drying beds	July 30, 1990	Complete

6/6