

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: June 21, 2005/ 0900 – 1330 hrs.

Site Contact(s): Cliff Franklin, DOE, Bob Fiehweg, FEI, and Frank Huffman,
RFCSS

Phone: 303-994-1941

Regulatory Contact: Colleen Gillespie, Bruce Kent, and Aaron Urdiales, EPA

Phone: 303-312-6133

Agency: EPA

Purpose of Contact: Annual NPDES Inspection

Discussion

EPA scheduled a final NPDES inspection of the Rocky Flats Environmental Technology Site (RFETS) to confirm the removal of the removal of the wastewater treatment plant and storm water outfall SW022. The agency representatives also expressed interest in the remaining storm water outfalls, and wanted to review the installed erosion controls.

Following badging and the video tape introduction to the Site, the 6 participants identified above made their way across the Site to begin at SW093, then to an overlook just east of the former site of B995, on to the B-series ponds, and finally, over to SW027.

The EPA representatives were satisfied that the direct discharge outfalls have, indeed, been removed, as well as storm water outfall SW022. Overall, they were satisfied with the erosion control and storm water pollution prevention activities; the only deficiency noted was one storm grate on the south side of B440 that did not have straw bale protection.

One of the main reasons for the Site visit was to assess current conditions so that the agency can make a decision on the future Clean Water Act permitting of RFETS. The current permit expires on September 30, and while there has been no formal reapplication submitted (reapplication would have to have been submitted by April 1, 2005), EPA claims flexibility on filing reapplications and permit renewal i.e., the RFETS permit could be renewed even at this late date. Bruce Kent, the current NPDES permit writer for Rocky Flats, agreed that there were no direct discharge points left to permit, and that the original industrial activities for which the individual storm water permit was issued no longer exist. In order to allow the current permit to expire by its own terms and

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conditions, Bruce favors publication of a notice to that effect, with additional notification sent to the stakeholders. While there is no regulatory basis for a public notice regarding a permit expiration, Bruce favors the open forum approach. With no wastewater plant and no industrial activities, it seems that no amount of public comment would forestall the planned termination of the NPDES permit as we know.

As for any future Clean Water Act controls for the Site, the EPA visitors had no strong leanings. They plan to confer with the Region VIII storm water manager and the EPA RFCA Project Coordinator.

Contact Record Prepared By: Bob Fiehweg, 303-994-1941

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