

**Project Plan for
Monitoring and Disposition of Incidental
and Foundation Drain Waters**

**U.S. Department of Energy
Rocky Flats Environmental Technology Site
Golden, Colorado**

**Prepared by EG&G Rocky Flats, Incorporated
Environmental Protection Management Department
Surface Water Branch**

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ADMIN RECORD

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1.0 PURPOSE OF PROJECT

The purpose of this project is to enhance the monitoring and disposition of incidental and foundation drain waters in order to bolster the protection of surface water quality at the Rocky Flats Environmental Technology Site (RFETS), in support of the recommendation of the Industrial Area Interim Measures/Interim Remedial Action (IA IM/IRA). Incidental waters and foundation waters are presently controlled by the procedure Control and Disposition of Incidental Waters, 1-C91-EPR-SW.01, and the Rocky Flats Surface Water Management Plan (SWMP), respectively. The objectives of this project will be met primarily through the revision of these two documents.

It is important to fully characterize the incidental and foundation water at RFETS to ensure that, when necessary, the appropriate treatment facilities exist and are utilized. An evaluation performed during the development of the IA IM/IRA identified several additional data needs.

To fill these data gaps, the locations of building sumps and foundation drains will be verified, with newly identified discharges being added to the SWMP for monitoring and assessment. Foundation drain discharges will be monitored quarterly for flow and quality. Additionally, the analyte sampling list will be expanded for valve vault incidental waters, and field documentation of surface water samples will be enhanced.

Once these incidental and foundation drain waters have been characterized, the proper disposition method can be determined. Water found to have no characteristics beyond the allowable limits is generally discharged to the environment. If the water is found to be unsuitable for discharge to the environment, the next step is to determine whether the water can be treated by the Waste Water Treatment Plant (WWTP). This determination is made based on both regulatory and operational considerations. If the water cannot be treated by the WWTP, the third and final step is to determine which of the remaining treatment facilities on plantsite (such as the Building 374 or OU2 treatment facilities) is most appropriate for treating the water. While this disposition methodology is presently implemented, it is not proceduralized; therefore, this three tier system will be explicated in the revised CDIW procedure.

Also as part of this project, an assessment of the current treatment facilities, including pretreatment, at RFETS will be performed to assure that adequate capacities and capabilities exist. The assessment will include obtaining the support and concurrence of the facility operators to assure acceptance of contaminated waters when necessary and appropriate. The assessment will also address the routing requirements for conveying waters to the various treatment facilities.

2.0 OVERVIEW OF WORK SCOPE

2.1 Monitoring

2.1.1 Verify building sump and foundation drain discharge locations.

Newly identified discharges will be monitored in accordance with the SWMP.

2.1.2 Implement quarterly sampling of foundation drain discharges.

Foundation drain discharges will be monitored quarterly in order to characterize flow and quality. Monitoring will be conducted in accordance with the OU8 Technical Memorandum.

2.1.3 Add expanded analyte list for valve vault water to CDIW procedure.

2.1.4 Enhance field documentation of surface water samples.

2.2 Disposition

2.2.1 Revise CDIW procedure to describe the "three tier" disposition methodology.

2.2.2 Assess capacity and capabilities of treatment facilities.

Assessment of treatment facilities will address pretreatment capabilities. Concurrence from facility operators for acceptance contaminated waters when necessary and appropriate will be pursued.

2.2.3 Address routing of waters to treatment facilities.

3.0 APPLICABILITY OF THE PROJECT PLAN

This project plan controls the implementation and achievement of the objectives and work scope outlined in Sections 1 and 2 (above).

4.0 ORGANIZATION AND INTERFACES

4.1 Project Activities and Responsibility Matrix:

Major Activity/Task (Est. Effort) *	Responsibility **
<u>FY95</u>	
Project Management (20 hr)	Surface Water
Discharge Location Verification (100 hr)	Surface Water
Implement Quarterly Sampling (40 hr)	Surface Water
Expand CDIW Analyte List (20 hr)	Surface Water / Procedures
Enhance Field Documentation (40 hr)	Surface Water
Add "Three Tier" System to CDIW (40 hr)	Surface Water / Procedures
Assess Treatment Facilities (100 hr)	Surface Water
Address Routing (40 hr)	Surface Water
• <i>FY95 TOTAL (420 hr)</i>	

* Times are estimates of effort required to complete activity and are not interpretable as total activity durations.

** Lead organization for each major task is listed first.

5.0 PROJECT PLAN SCHEDULE

The project schedule is:

<u>FY95 Activity</u>	<u>To Be Completed</u>
Project Plan	May 19, 1995
Discharge Location Verification	June 30, 1995
Implement Quarterly Sampling	July 28, 1995
Expand CDIW Analyte List	September 1, 1995
Enhance Field Documentation	July 28, 1995
Add "Three Tier" System to CDIW	September 1, 1995
Assess Treatment Facilities	September 29, 1995
Address Routing	September 29, 1995

A project timeline appears in Appendix 1.

6.0 TASK DESCRIPTIONS

6.1 Task Identification

The tasks which comprise this project, as listed and described in Sections 1 and 2 (above), are all funded under Work Package 12196, charge number 986540-00. The tasks support the goals of the larger, IA IM/IRA project.

6.2 Task Justification

This project supports the enhanced monitoring of incidental and foundation drain waters as described in the IA IM/IRA.

6.3 Task Deliverables

This project provides the following major deliverables:

- Revised CDIW procedure
- Revised SWMP

6.4 Task Acceptance Criteria

The Project Manager will assure that document reviews for the project will be conducted according to the Environmental Protection Management (EPM) procedure, Document Review, 3-21000-ADM-06.01.

6.5 Task Procedures

The tasks which comprise this project will not involve technical or operational procedures. Procedures which will be utilized are administrative in nature and include Procedure Process, 1-AL1-PPG-001, as well as those procedures listed in Sections 6.4, and 6.6.

6.6 Task Records

Project information will be documented according to the ERM Procedure, Control of Scientific Notebooks (2-G06-ER-ADM-05.10, Rev 0.1, Draft). The Project Manager will assure any records used in developing, or required to substantiate the project will be controlled according to Records Management Guidance for Records Sources, 1-77000-RM-001.

6.7 Task Required Resources

The Monitoring and Disposition of Incidental and Foundation Drain Waters project is funded under FY95 Work Package (WP) 12196 specifically under the "Implementation of Surface Water Proposed Actions," Activity 12196130. The FY95 charge number for this activity is 986540-00.

<u>FY95 Activity</u>	<u>Funding</u>
Labor	420 hrs

The main driver of the Monitoring and Disposition of Incidental and Foundation Drain Waters project is the IA IM/IRA, the basis of which is protection of human health and the environment under Comprehensive Environmental Response Compensation and Liability Act (CERCLA). IM/IRA's are designed to address an imminent threat of damage to health or the environment. Enhancing the monitoring and disposition of incidental and foundation drain waters will lower the risk of exposing the public and the environment to harmful levels of contaminants which may be contained in these waters.

Potentially applicable or pertinent requirements include: Clean Water Act (CWA)/NPDES, Safe Drinking Water Act (SDWA), Resource Conservation and Recovery Act (RCRA), CERCLA, as well as pertinent state statutes and site-specific agreements (AIP, FFCA) and standards (CWQCC stream standards).

8.0 PROJECT PLAN REQUIREMENTS

IM/IRA's are intended to govern interim actions to address/mitigate the spread of contamination, and any actions or measures must be consistent with the final CERCLA action. The accepted timeframe for these interim measures is 3 to 5 years. The Monitoring and Disposition of Incidental and Foundation Drain Waters project is a response to IM/IRA requirements for enhanced monitoring of industrial-area activities — environmental restoration and D&D — that present the potential for release of increased levels of contamination. Extensive evaluations of water quality have indicated small but persistent contaminant sources. This together with the presence of some 178 individual hazardous substance sites (IHSSs) argue for full characterization of discharges which may introduce contaminants to surface waters at RFETS.

9.0 TRAINING AND QUALIFICATIONS

Qualified and trained personnel will be used for administrative, technical, and operational tasks described in this plan. Minimum training requirements include HS education and completion of RFETS core training curriculum. The applicability of other task-specific qualifications and training will be made by the project manager.

10.0 PROJECT PLAN GLOSSARY

Abbreviations and Acronyms

AIP	Agreement in Principle
CDIW	Control and Disposition of Incidental Waters
CERCLA	Comprehensive Environmental Response and Comprehensive Liability Act
CWQCC	Colorado Water Quality Control Commission
D&D	Decontamination & Decommissioning
ERM	Environmental Restoration Management
FFCA	Federal Facilities Compliance Agreement
IA IM/IRA	Industrial Area Interim Measures / Interim Remedial Action
IHSS	Individual Hazardous Substance Sites
NPDES	National Pollutant Discharge Elimination System
OU	Operable Unit
RCRA	Resource Conservation and Recovery Act
RFETS	Rocky Flats Environmental Technology Site
SDWA	Safe Drinking Water Act
SWMP	Surface Water Management Plan
WWTP	Waste Water Treatment Plant

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Appendix 1

Monitoring and Disposition of Incidental and Foundation Drain Waters Project Plan Project Timeline

ID	Name	May			June			July				August				September							
		5/14	5/21	5/28	6/4	6/11	6/18	6/25	7/2	7/9	7/16	7/23	7/30	8/6	8/13	8/20	8/27	9/3	9/10	9/17	9/24	10/1	
1	Complete Project Plan	◆																					
2	Revise SWMP		▨																				
3	Discharge Location Verification		▨																				
4	Implement Quarterly Sampling								▨														
5	Enhance Field Documentation								▨														
6	Complete SWMP Revision																						
7	Revise CDIW																						
8	Expand CDIW Analyte List												▨										
9	Add "Three Tier" System to CDIW											▨											
10	Complete CDIW Revision																						
11	Assess Treatment Facilities																						
12	Address Routing																				▨		
13	Complete Monitoring & Disposition Project																						◆