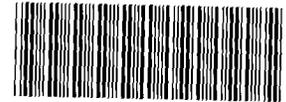


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INTEROFFICE MEMORANDUM

Rocky Flats Environmental Technology Site
P. O. Box 464
Golden, Colorado 80402-0464
Phone: (303) 966-2677
Fax: (303) 966-8244

DATE: June 20, 1996

TO: S. W. DeWitt, Waste Management, Bldg. T893A, X3324

FROM: J. A. Ledford, Sitewide Actions, Bldg. T893A, X2085 *JAL*

SUBJECT: WATER BLANKET AT POND 207C - JAL-002-96 *JAL*

ACTION: Maintain Water Blanket at Pond 207C as Described Herein

This correspondence will serve to document the discussions held and decisions made regarding actions necessary to maintain a water blanket at Pond 207C. The issue has arisen as a result of the recent hot, dry weather which has evaporated the water in Pond 207C to the extent that an effective water blanket no longer exists.

The water blanket is required to prevent air dispersion of radioactively and hazardously contaminated fines from the surface of the pond liner. Prevention of such dispersion is necessary as good management practice, to maintain compliance with the intent of the Resource Conservation and Recovery Act (RCRA) to effectively manage wastes in regulated units, and to maintain compliance with the provisions of several DOE Orders and policies.

Two questions arose regarding our most recent need to re-establish the water blanket: 1) is the activity properly authorized and listed on the Master Activity List (MAL), and 2) can the blanket be re-established using collected precipitation water from Pond 207A.

With regard to the first question, I have spoken to Barbara Swenson, Kaiser-Hill MAL Coordinator, to disclose the activities we need to perform at the ponds and to receive direction as to what actions must be taken to ensure compliance with MAL requirements. Ms. Swenson informed me by telephone that she views our proposed activities to be part of the baseline, specifically B9 and B12. Further, she stated that no notification beyond my telephone conversation with her is required to authorize the activities from a MAL perspective.

The second question is not so easily answered accurately, although a conservative and fully acceptable answer is "no." The issue is confused by statements made several years ago by the Colorado Department of Public Health and Environment (CDPHE) that the ponds consist of two RCRA-regulated units (Pond 207C and the combination of Ponds 207A and the B-series), and that wastes could not be transferred between the units. Although this was a unilateral proclamation on the part of the State, it was not challenged and was followed during all recent pond water/waste management activities. It is not clear at this time whether this constraint remains in effect nor, if it is, whether it would apply to precipitation water collected in the ponds.

With time being critical in our present circumstance, I feel we are not able to resolve this second question to any answer but the conservative one. My feeling results from the fact that we should at least inform CDPHE of our intent to transfer water prior to actually doing it, and that doing so through the various involved parties at Rocky Flat Environmental Site (RFETS) and the State

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would take longer than we have to re-establish the blanket. Therefore, I want you to use an alternate source for the necessary water.

I suggest that you use water obtained from the nearest fire hydrant. I do not believe that such use violates our commitments to waste minimization since the water so used will evaporate from the pond without any effort or cost on our part and will not result in any increase in the wastes generated or stored at the site.

I will contact the interested parties at RFETS to move this issue toward resolution in favor of using collected precipitation water in the future and will keep you informed of my progress in that effort. Meanwhile, you are authorized to use fire hydrant water in the minimum quantity necessary to maintain an effective water blanket and to repeat this operation as necessary. This task is not one affected by the recently issued Stop Work Notice, but please be mindful of the budget constraints placed on your activities as we have discussed in prior conversations and correspondence. Make every effort to minimize the personnel involved in the task and its duration in order to reduce costs as much as possible.

Please contact me at extension 2085 or digital pager 5338 if you need any further information.

JAL:slm

cc:

G. L. Aguero	- RMRS	371
G. R. Konwinski	- RMRS	T-130F
J. E. Law	- RMRS	T-893A
T. P. O'Rourke	- RMRS	T-893A
A. M. Parker	- RMRS	T-893A
A. L. Primrose	- RMRS	T-893A
J. P. Schmuck	- RMRS	T-893B
A. K. Sieben	- Kaiser-Hill	371
B. A. Swenson	- Kaiser-Hill	T-130C

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