

STATE OF COLORADO

Bill Owens, Governor
Jane E. Norton, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION
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Colorado Department
of Public Health
and Environment

February 20, 1999

Joe Legare
RFCA Coordinator
Department of Energy-RFFO
P.O. Box 928
Golden CO 80402-0928

RE: Draft Solar Ponds Decision Document - January 5, 1999 (RF/RMRS-98-286.UN)

Dear Mr. Legare:

Comments on the above referenced decision document have been previously transmitted by the Colorado Department of Public Health and Environment. There is an additional issue regarding meeting the substantive requirements of the NPDES regulations as described in Section 7.0. Those regulations would require an explanation of how the proposed treatment would comply with discharge requirements. A statement that the selected treatment system is expected to meet the underlying stream standards, which are described as ARARs in Section 7.2.3, should be added to that section. Also, diversion of ITS waters to Pond A1 proposed in Section 5.2 would constitute a point-source discharge. Please add to Section 7 a discussion of those requirements which would have been imposed by applying the NPDES Permit to waters diverted to Pond A1.

If you have any questions concerning these comments, please contact me at 303-692-3367 or Carl Spreng at 692-3358.

Sincerely

Steven H. Gunderson
RFCA Project Coordinator

Carl Spreng
Federal Facilities Program



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SOLAR PONDs Plume