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Priority: Normal  
TO: Ted Hopkins at Hotel17  
Subject: Weekly Report

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Ted

Attached is this week's diatribe. I'll copy it in below, as well as attaching a Word.doc.

Bob

Weekly Report - June 25, 1998  
Bob Fiehweg

## I. Accomplishments

1. Preparing for The Permit - In the event that reports from EPA that the NPDES may be issued in the near future are credible (see below for related information), steps are being taken to make sure that requirements that take effect immediately upon permit issuance can be met. Of primary concern are the new analytical requirements that take effect at both B995 and B374. Leslie Dunstan, Surface Water, has prepared a list of new requirements and has advised the Analytical Projects Office of the new analytes and detection levels. The APO is adding new scope to the statements of work under which the contract laboratories perform the analyses.

2. Assisted DOE in completing a Congressional questionnaire regarding non-point source pollution controls. Gail Hill sent the following info back to Washington:

Attached is the reply to the questionnaire submitted by your organization last week.

Please note that we are awaiting a NPDES permit renewal from EPA that contains storm water monitoring provisions. We also have active watershed management programs on site to reduce or mitigate non-point source pollution of holding ponds and creeks at the Site. However, these programs do not exceed \$10M/yr, and are budget-limited.

Additionally, the Site is an active participant in the Big Dry Creek Watershed Working Group, which is a alliance of staff from DOE, K-H, RMRS, the State of Colorado, EPA, and local communities to assess the impacts of various point and non-point discharges on the biology and water quality of Big Dry Creek, which is downstream from the Site. This group was formed just prior to the release of the Vice President's Clean Water Action Plan, but is very much aligned with the plan's objectives.

If you have any questions, or need more information, please e-mail me, or call me at (303) 966-3424.

(See attached file: Questionnaire on Non-pt Source Programs.doc)  
(See attached file: List of Non-Pt Source Poll Programs.doc)

## II. Problems and Issues

### NPDES Permit Update

At the June 16th Surface Water Issues Meeting (SWIM), henceforth to be known as the Water Working Group (until a better name is selected), EPA announced that the NPDES permit was being circulated for internal review. Bill Fraser speculated that the process could take about 2

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weeks, after which the permit process would allow 30 days for permittee review and response before becoming effective. Representatives from the City of Broomfield voiced a complaint that they had not been allowed to see the current form of the permit (to which EPA responded that it wasn't much different from the draft version issued for public comment last August) and, further, asked that they be allowed to see the permit before it is released (to which EPA speculated that it may be made available to Broomfield).

On June 19th, Broomfield formalized their position in a letter to William Yellowtail, EPA Region VIII Administrator, asking that the permit be revised to require the installation of the McKay bypass as a condition for installing and using STP2, the proposed new outfall below Pond B-5. The city's rationale cites the 1997 exceedances of plutonium standards and the fact that the permit does not contain plutonium limitations at STP2. It was announced this week that the wastewater plant at the Idaho National Laboratory will pursue an NPDES permit for discharge to the Lost River; DOE, RFFO has been alerted in the event Broomfield wants to review, comment and control the permitting process there, as well.

Broomfield has also issued a letter to DOE in response to a May 1st meeting at which DOE request justification for the McKay extension and, as required by the Option B grant, formal notification of the proposed change in use of Great Western Reservoir. Broomfield has evidently not supplied sufficient information to DOE to satisfy federal requirements for project justification, which may delay the McKay extension.

The renewal permit is linked to new language proposed for the Rocky Flats Cleanup Agreement (RFCA). While the language requiring radionuclide monitoring at the wastewater treatment plant and below Pond B-5 has been discussed and accepted in principle, other modifications to RFCA, scheduled to be adopted in July, have not been approved by the RFCA coordinators. As a result, the changes to RFCA may not be adopted, including the requisite public comment period, at the same time the renewal permit is projected to be issued.

### III. Self-Assessments

None