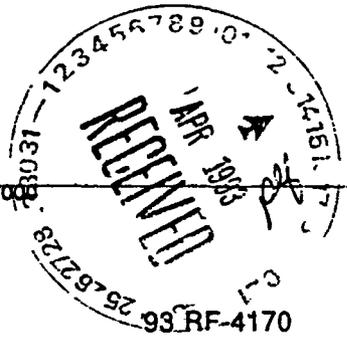


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EG&G ROCKY FLATS

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EG&G ROCKY FLATS INC
ROCKY FLATS PLANT P O BOX 464 GOLDEN COLORADO 80402 0464 (303) 966 7000

April 7 1993

A H Paule
Acting Manager
DOE RFO

Attn M S Karol

**DISPOSITION OF WASTEWATER COLLECTED IN BUILDING 559 DEWATERING SUMP
JOZ 134 93**

Over the past weeks a number of alternatives for disposal of water from the Building 559 foundation dewatering sump have been evaluated technically and in accordance with the Resource Conservation and Recovery Act (RCRA) and Clean Water Act (CWA) regulations EG&G Rocky Flats Inc has recommended and continues to recommend that management of the foundation water by treatment at the Rocky Flats Plant Sewage Treatment Plant (STP) is the best option from a technical and regulatory standpoint The STP option provides suitable treatment and the least environmental insult of the options available and is supported by provisions of the RCRA and CWA regulations

The alternative treatment options evaluated were the Operable Unit 1 (OU1) Treatment Unit which utilizes an ultraviolet peroxide treatment process OU2 Treatment Unit which utilizes a granular activated carbon (GAC) removal process Building 374 Evaporator and the STP The OU1 and Building 374 options provide volatilization of the contaminants to the air not treatment or destruction Likewise OU2 transfers the organic contaminants in the wastewater to the GAC which then must be handled as a waste until treated or disposed The STP based on technical information provided by the U S Environmental Protection Agency (EPA) provides biological treatment of carbon tetrachloride and other organics detected in the subject water

The recommended alternative of discharging the subject water to the STP has a number of advantages

- (1) The contaminants are compatible with treatment capabilities at the STP
- (2) Activated sludge and anaerobic treatment can provide up to 98 / removal of carbon tetrachloride
- (3) The contaminants are converted to innocuous carbon dioxide instead of transferred to another medium creating yet another waste
- (4) There is no costly storage and transportation
- (5) The STP is equipped with real time monitoring equipment to protect against harmful influents
- (6) There is no competition for treatment capacity as at the OU1 OU2 and Building 374 units and

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RMAN, H S		
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VIS, J G		
RRERA, D W		
NNI, B J		
RMAN, L K		
ALY, T J		
DAHL, T	X	X
LBIG, J G		
RBY, W A	X	X
JESTER, A W		
E, E M		
ANN, H P	X	X
ARX, G E		
DONALD, M M		
KENNA, F G	X	X
ONTROSE, J K		
JRGAN, R V		
JTTER, G L	X	X
ZZUTO, V M	X	X
LEY, J H		
ANDLIN, N B		
HEPLER, R L		
FEWART, D L		
JLIVAN, M T		
WANSON, E R		
ILKINSON, R B		
ILLIAMS, S (ORC)		
ILSON, J M		
ANE, J O	X	X
3ERTAL	X	X
DRICH, D W	X	X
NOTYK, K	X	X
GIBBS, F	X	X
WARD, D	X	X
DOKE, S, D	X	X
TICKNER, K W	X	X
REGS CONTROL	X	X
MIN. R. CORD		
AFFIC		

CLASSIFICATION		
CN	X	X
UNCLASSIFIED	X	X
CONFIDENTIAL		
CRT		

HORIZONTAL CLASSIFIER
SIGNATURE
[Signature]
DATE 4/7/93
REPLY TO RFP CC NO

ITEM STATUS
OPEN / CLOSED
PARTIAL APPROVALS
RIG & TYPIST INITIALS
[Initials]

ADMIN RECORD

REVIEWED FOR CLASSIFICATION/UCNI
By Sea Duran Luna
Date 8-11-93

- (7) Treatment of this type of water at OU1 or OU2 under the Environmental Restoration Interagency Agreement (IAG) could set an undesirable precedent for the entire plant site. This precedent could result in other similar incidental waters having to be remediated under the IAG which would result in large long term cost increases for handling water that is not harmful to human health or the environment.

On the other hand disposal at the STP carries the potential to volatilize some of the organics although the releases would be minimal and sump discharges may require increased monitoring to ensure organic thresholds are maintained to assure treatment and to prevent disruption of the biological treatment processes at STP. There is also the perception that this alternative provides dilution rather than treatment. While it is true that dilution will occur it is also true that EPA has demonstrated treatability of these organic constituents at the concentrations expected to occur at the entrance to the STP.

Enclosed is the draft letter to the Colorado Department of Health (CDH) which provides our position on our regulatory analysis pertaining to the subject water. This enclosure is provided pursuant to a meeting between representatives of the Department of Energy Rocky Flats Office (DOE RFO) and EG&G Rocky Flats Inc on April 5 1993. Upon CDH concurrence with this assessment we recommend that DOE RFO notify the U S Environmental Protection Agency (EPA) pursuant to the existing NPDES Permit prior to discharging the subject water to the STP. A draft notification letter to EPA is enclosed.

If you have any questions or comments regarding this issue please contact David Ward at extension 5938 or Kirk Ticknor at extension 6344.


J O Zane
General Manager

KWT kam

Orig and 1 cc A H Pauole

Enclosures
As Stated