

ORDER #

96-RF01881

4B101



DIST.	LTR	ENC
USSEN, STAN		
TONY		
BOB		
JOHN		
VIK		
INEZ, LEN		
ALLY, JIM		
Y, BOB		
EN, GEORGE		
NANCY		
HEIS, GARY		
ER, CAL		

March 26, 1996

96-RF-01881

Jessie Roberson, Assistant Manager
ES&H Program Assessment
DOE, RFFO

Attn: D. George

I, T. G.	X	X
Russ		
ore, Drew		
ent		
Steve		
dy, Colburn		
J, Russ		
Gary		
i, Ann		
er, Annette		
ht, Karen	X	X
cks, L.	X	X
Teri, C	X	X
sth, K.	X	X
cton, D	X	X
ES CONTROL	X	X
RECRD/080	X	X
IC		
1130G		

DISCHARGE OF OPERABLE UNIT (OU) 1/OU 2 TREATED GROUNDWATER - TGH-067-96

The purpose of this letter is to transmit a draft letter to the agencies requesting approval of discharging treated groundwater from OU 1 and OU 2. The draft letter to the agencies has already been forwarded to Dave George via cc:Mail at his request. Preliminary conversations with Chris Gilbreath/Colorado Department of Public Health and Environment (CDPHE) and Gary Kleeman/Environmental Protection Agency (EPA) indicate that there should not be a problem obtaining their approval. The following discussion presents the situation.

Because of low storage capacity, groundwater from OU 1 and OU 2 was treated prior to the granulated activated carbon (GAC) and microfiltration units being installed. These units are from the original OU 2 treatment facility.

It was recognized at the time that the water may need to be retreated because not all of the contaminants may have been removed. Anticipating that retreatment would be necessary, the effluent was sampled and analyzed for only volatile organic compounds (VOCs) and total metals. All VOC and metal constituents were below the OU 1 and OU 2 Interim Measure/Interim Remedial Action (IM/IRA) applicable or relevant and appropriate requirements (ARARs).

The treated water was then resampled and analyzed for the full suite of constituents required by the OU 1 and OU 2 IM/IRA documents. With the exception of zinc, all of these constituents were below the OU 1 and OU 2 IM/IRA ARARs and the RFCA action levels and standards for surface water. The value for zinc was 0.052 mg/L (dissolved). The sample was reanalyzed for dissolved metals. The value for zinc was 0.060 mg/L (dissolved). The initial sample showed the zinc level at 0.024 mg/L (total). These values are well within the OU 1 zinc ARAR of 2.0 mg/L (dissolved); however, they are above the OU 2 zinc ARAR of 0.05 mg/L (total).

The Rocky Flats Cleanup Agreement (RFCA) has proposed an action level and a standard for zinc in surface water. Both the action level and the standard are 0.141 mg/L (total). Additionally, the RFCA groundwater Tier 2 action level for zinc is 11 mg/L. The treated groundwater meets the action levels and the standard for zinc. Since the zinc level meets the RFCA action levels and standard, we are requesting approval to discharge the treated water to the South Interceptor Ditch (SID) which eventually flows to Pond C-2.

If you have any questions or require additional information, please do not hesitate to contact Karen Wiemelt, of my staff, at extension 9883.

CLASSIFICATION:

CLASSIFIED
CONFIDENTIAL
SECRET

AUTHORIZED CLASSIFIER

SIGNATURE:

per CEX-266-95

3-26-96

PLY TO RFP CC NO.:

ACTION ITEM STATUS:

PARTIAL/OPEN

CLOSED

LTR APPROVALS:

IG. & TYPIST INITIALS:

KLW :bag

9 (Rev. 4/25/95)

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

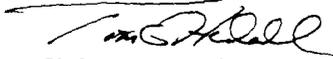
Kaiser-Hill Company, L.L.C.

Courier Address: Rocky Flats Environmental Technology Site, State Hwy. 93 and Cactus, Rocky Flats, CO 80007 • 303.966.7000

Mailing Address: P.O. Box 464, Golden, Colorado 80402-0464

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Because of this situation, we have recognized the need to clarify the treatment discharge limits for the consolidated treatment facility. We will follow up with a recommendation for this effort which will be consistent with RFCA.



T.G. Hedahl, Director
ER/W&I Operations
Kaiser-Hill Company, L.L.C.

KLW:bag

Orig. and 1 cc - J. Roberson

Attachment:
As Stated

cc:
Chris Gilbreath - CDPHE
Dave George - DOE, RFFO
Steve Slaten - " "
Gary Kleeman - EPA
Maria Broussard - RMRS
Russ Cirillo - "
Candice Jierre - "
Alan Parker - "
John Schmuck - "
Ty Vess - "



DRAFT

DRAFT

Mr. Tim Rehder
Environmental Protection Agency, Region VIII
ATTN: Rocky Flats Project Manager, 8HWM-FF
999 18th Street, Suite 500
Denver, Colorado 80202-2466

Mr. Joe Schieffelin
RFCA Unit Leader
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80222

Discharge of Operable Unit (OU) 1/OU 2 Treated Groundwater

Gentlemen:

The purpose of this letter is to request your approval of discharging treated groundwater from OU 1 and OU 2. Because of low storage capacity, groundwater from OU 1 and OU 2 was treated prior to the granulated activated carbon (GAC) and microfiltration units being installed. These units are from the original OU 2 treatment facility.

It was recognized at the time that the water may need to be retreated because not all of the contaminants may have been removed. Anticipating that retreatment would be necessary, the effluent was sampled and analyzed for only volatile organic compounds (VOCs) and total metals. All VOC and metal constituents were below the OU 1 and OU 2 Interim Measure/Interim Remedial Action (IM/IRA) applicable or relevant and appropriate requirements (ARARs).

The treated water was then resampled and analyzed for the full suite of constituents required by the OU 1 and OU 2 IM/IRA documents. With the exception of zinc, all of these constituents were below the OU 1 and OU 2 IM/IRA ARARs and the RFCA action levels and standards for surface water. The value for zinc was 0.052 mg/L (dissolved). The sample was reanalyzed for dissolved metals. The value for zinc was 0.060 mg/L (dissolved). The initial sample showed the zinc level at 0.024 mg/L (total). These values are well within the OU 1 zinc ARAR of 2.0 mg/L (dissolved); however, they are above the OU 2 zinc ARAR of 0.05 mg/L (total).

The Rocky Flats Cleanup Agreement (RFCA) has proposed an action level and a standard for zinc in surface water. Both the action level and the standard are 0.141 mg/L (total). Additionally, the RFCA groundwater Tier 2 action level for zinc is 11 mg/L. The treated groundwater meets the action levels and the standard for zinc. Since the zinc level meets the RFCA action levels and standard, we are requesting approval to discharge the treated water to the South Interceptor Ditch (SID) which eventually flows to Pond C-2.

If you are in agreement with discharging the treated groundwater, please sign at the bottom of this letter. If you have any questions or require additional information, please do not hesitate to contact _____ at extension _____.

Because of this situation, we have recognized the need to clarify the treatment discharge limits for the consolidated treatment facility. We will follow up with a recommendation for this effort which will be consistent with RFCA.

Sincerely,