



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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DENVER, COLORADO 80202-2405

JUN 19 1991



Ref: 8HWM-FF

David P. Simonson, Assistant Manager
Environmental Management
Department of Energy
Rocky Flats Plant
P.O Box 928
Golden, CO 80402-0928

Dear Mr. Simonson:

This letter concerns the Superfund Innovative Technology Evaluation Program (SITE) Techtran Demonstration proposed to take place at Rocky Flats Plant (RFP). Environmental Protection Agency (EPA) Region VIII is committed to the development and demonstration of innovative technologies, and is anxious to cooperate with Department of Energy (DOE) to further the development of potentially useful innovative technologies. In addition we believe that the SITE Program can provide an established administrative mechanism to develop innovative technologies at National Priority List (NPL) sites. However, we also believe that there are some technical concerns and administrative difficulties which must be resolved prior to integrating the SITE Demonstration Program into the Comprehensive Environmental Response, Compensation, and Liability Act/Resource Conservation and Recovery Act (CERCLA/RCRA) process for evaluation and selection of treatment technologies at Federal Facilities which are the subject of Interagency Agreements.

EPA's technical concerns with the proposed Techtran technology include the following:

1. Although the proposed technology has a potential to treat metal-contaminated water, no bench scale studies have been performed to determine its potential to remove radionuclides which are present in the ground water at very low levels;
2. Sufficient technical information has not been presented to the Region in order to technically evaluate the technology and determine its feasibility to treat Rocky Flats waste; and
3. If utilized as a full scale treatment technology, the technology will generate large amounts of mixed hazardous waste which is inconsistent with the NCP and for which DOE has limited RCRA storage capacity.

The Interagency Agreement (IAG) and the Research, Development and Demonstration (RD&D) RCRA permit are the only

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mechanisms that can accommodate the SITE Demonstration Program at RFP. The following administrative difficulties need to be addressed prior to integrating the SITE Demonstration Program into work performed as a requirement under the IAG or pursuant to an RD&D permit:

1. The public comment on the SITE Demonstration must be structured to comply with the National Contingency Plan (NCP) or RCRA requirements, and provide meaningful public participation in the decision making process;
2. The discrepancy between the public comment period requirement of the SITE Program and the lack for any such requirement for the Site-wide Treatability Study Plan under the IAG needs to be resolved; and
3. The timing of the project must be coordinated with timing of the approval of the Site-wide Treatability Study or a RCRA RD&D permit.

The above mentioned technical concerns and administrative difficulties with the proposed SITE technology demonstration must be addressed and resolved prior to presenting this project to the public or we may be undermining the integrity of the cleanup objectives and community involvement commitments within the IAG. It is our opinion that bench scale studies should be conducted on the proposed technology with Rocky Flats contaminated water prior to an actual demonstration or the opening of a public comment period. With this approach and upon resolution of the administrative difficulties, we will obtain and gather information that will help us promote the technology's demonstration at RFP.

Again, I wish to emphasize that although this specific proposed demonstration may not be appropriate to implement at Rocky Flats, EPA Region VIII is committed to furthering the development of innovative technologies for use at Rocky Flats. If you should have any questions regarding this letter please contact Martin Hestmark of my staff at (303) 294-1134.

Sincerely,



Robert L. Duprey, Director
Hazardous Waste Management Division

cc: Frazer Lockhart, DOE
Gary Baughman, CDH
Tom Greengard, EG&G