



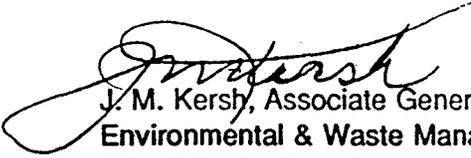
Robert M. Nelson, Jr.  
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The regulations and pertinent guidance documents indicate that the type of operation in question, i.e., pumping groundwater, storage in tanks, and treatment by evaporation in order to prevent contaminant migration, clearly constitutes an IM/IRA. IM/IRA actions must be permitted either through a RCRA Permit for RCRA facilities, or through an IM/IRA Decision Document for CERCLA sites.

Operation of the existing interceptor trench system is not currently covered by a RCRA permit. A RCRA Permit is expected to be issued to the RFP for storage operations within the next few months. The RCRA permit will incorporate attachments one through four of the IAG, which specify that the CERCLA process for IM/IRA's be followed. It may be possible to modify the permit once it is finalized to address the ITPH pumping, storage and treatment operations separately, but this should be discussed with the regulatory agencies.

In summary, the IM/IRA process outlined in the IAG appears to be appropriate for operation of the interceptor trench, storage tank, and flash evaporator system. However, performing this process will severely impact the solar pond clean out operation schedule in the AIP and subsequently the IAG schedule. The regulatory agencies should be contacted as to whether they want to expedite the clean out of the ponds by addressing the ITPH pumping, storage and treatment operations separately in RFP's RCRA Permit for storage operations, or whether they would prefer the slower IM/IRA process.

I recommend that you contact the regulatory agencies and sponsor the modification of the Part A permit since it is most expeditious in implementing the IAG on schedule. Should you have any questions, please contact Tom Greengard or Randy Ogg of the Remediation Programs Division at extension 7121 or 7079 respectively.



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As Stated

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