

Rocky Flats Cleanup Commission

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COMMENTS ON THE OPERABLE UNIT FOUR INTERIM MEASURE / INTERIM REMEDIAL ACTION

Board of Directors

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PART ONE: GENERAL COMMENTS

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- 1) Perhaps the most glaring defect in this document is its lack of description surrounding the pondcrete operation at the plant. Given the problems that this operation has had in the past, the Cleanup Commission would like to have greater assurance that all technical problems have been solved and that pondcrete is a truly viable waste management solution.

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The plan needs to include data as to how much pondcrete will be produced as a result of the evaporation process. If we were to use the 1/50th reduction factor listed on page 3-26 and apply it to the 8 M gallons of water to be sent to the evaporators, approximately 160,000 gallons of waste would be generated. One would still need to figure in the amount of residue that will be produced from the ITS water as well as the sludge that remains in the ponds. How much pondcrete will eventually be produced? How will this waste apply towards the storage limits? What are the contingencies for storage should the Nevada Test Site remain closed to Rocky Flats waste?

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- 2) There is no adequate reference in the plan as to how long it will take to accomplish. Page 3-2 states that the system will operate 100 days during its first year of operation. Given the maximum treatment capacity listed on page 3-18 of 54,000 gallons per day and a total of 12 M gallons to treat, it would take 222 days to treat all the water. What are the projections for how long this operation will take to complete?

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- 3) Mention is made in the plan that there is a "no action" alternative for this proposal, but nothing is said about any other alternatives. It is our understanding that the purpose of these plans is to describe all the alternatives and then state why the planned alternative was chosen. Page 3-20 states that "in the event that specific quality requirements are not obtained by the proposed system, additional treatment units will be

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evaluated and incorporated into the treatment system as needed to meet or exceed performance requirements." We are led to believe that alternatives may not be available at this time, thus explaining their lack of inclusion in this plan.

PART TWO: SPECIFIC COMMENTS

SECTION 2.0

- 1) Page 2-18: In the second full paragraph, there is mention that "recent" characterization studies were not available when this report was written. Later, in the description of the treatability tests (page 3-18) it is stated that "simulated" water was used in testing the proposed treatment system. Are we to assume that the 1988 data found in Table 2-1 was used to create the "simulated" water? Are you certain that current contaminant concentrations are still the same and that the treatability tests reflect present day conditions?
- 2) Page 2-22: The first full paragraph states that VOC contamination is thought to have come from the west side of the ITS. Are we to assume that this contamination is not the result of infiltration from the solar ponds? Where does this VOC contamination come from?
- 3) Page 2-25: The discussion at the bottom of the page regarding groundwater contamination seems to state unequivocally that there is no chance of public contact with the contamination. What about seeps? Also, has there been any infiltration of contaminated groundwater past the ITS?
- 4) Page 2-30: In the discussion of risk characterization there is no mention made about possible public and worker exposure due to wind blown dispersion of sediments from the ponds once they are dry. Is there no potential that such a situation could occur? What safeguards are there to prevent such an occurrence?

SECTION 3.0

- 1) Page 3-2: There is some confusion in the statement at the bottom of the page that there will be "a" vapor compression unit (VC) and "three" multiple-effect, multiple stage (MEMS) flash evaporators. The diagram in Figure 3-1 shows three VC's and three MEMS, with each VC and MEMS acting as a pair. Are we correct in assuming that the diagram is correct?

More information needs to be included in the plan describing the VC and MEMS units. Without having to go into too much technical detail it would be beneficial to include a working description of these units.

Included in a better description of the process system, greater clarification is needed when you describe the system as being "closed loop." Page 2-26 speaks about the fact that VOCs might be aerosolized during their entrance into the flash tank and that a HEPA filter will be employed (page 2-28). Page 3-6 talks about how the distillate tanks must be vented in order for the "process to operate." In light of these statements please clarify what is meant by the system being "closed loop."

- 2) Page 3-6: Mention is made in the process description of how the distillate will be used in the cooling towers and if demand is low, as part of the steam generating system. How does the demand rate for these operations vary with production activities? Should the plant not reach full operating capacity during the time-frame when this evaporation will be taking place, will there be storage problems? Would the water then be allowed to empty directly into the sewage treatment system?
- 3) Page 3-12: In the alarm protocols listed on this page, we would suggest that you employ both audible and visible alarms for all situations.
- 4) Page 3-18: As was alluded to earlier, we are uncomfortable with the fact that the treatment units were tested using "simulated" water. We encourage you to share the results of the actual tests that will be performed once the system is on-line at RFP. Given the lack of alternatives, we sincerely hope that the system is indeed functional once placed under exact operating conditions.

SECTION 4.0

- 1) Page 4-7: In line four the text describes the site-specific water standards for RFP as being "goals," and thus not an "applicable" standard for ARARs. What exactly is meant by this statement? We were not under the impression that the site specific standards set by the Colorado Water Quality Control Commission are merely goals. We also have problems with the concept that ARARs may not have to be applied whenever an interim action is being carried out. We have stated this before in our comments on the IM/IRA for OU2 and still believe, regardless of what the NCP might state, that ARARs should be applied for all activities regardless of being interim or final.

- 2) Page 4-8: We would like a clarification of what is meant in the bottom third of section 4.3.6 where it is stated that the cancer risks are computed on the basis of the detection limit and thus considered a maximum carcinogenic risk, while the actual risk is "unknown" but "likely" to be lower. What statements of fact do you have to back up this claim?