

memorandum

Rocky Flats Office

DATE: NOV 02 1992

REPLY TO
ATTN OF: ERD:FRL

SUBJECT: Minutes of October 29, 1992 Meeting with the Colorado Department of Health and U.S. Environmental Protection Agency

TO: Solar Evaporation Pond (SEP) Program File

This memorandum provides the minutes of a meeting with the Colorado Department of Health (CDH) and Environmental Protection Agency, Region VIII (EPA) on October 29, 1992, at the EPA offices. The meeting focused on a discussion of the SEP Program status and issues for future planning. The roster of attendees is attached.

The meeting was intended to provide program information, provide a current status, provide opportunity for CDH and EPA feedback on issues, and enhance communications. It was successful in all of these areas. The discussion was focused around the main objectives of the SEP Program as listed below. These objectives were presented followed by factors currently affecting completion of each objective.

- 1) Minimize SEP cleanout impact on OU4 assessment and final remediation.
- 2) Eliminate SEP as source of contamination as quickly as possible.
- 3) Divert Interceptor Trench System (ITS) water from SEP.
- 4) Assure that treated product will meet transportation and disposal criteria.
- 5) Ship all treated product to Nevada Test Site (NTS) or alternate disposal location.
- 6) Conduct all storage and operations in full regulatory compliance.

Key information which was new to some of the meeting participants was the current projections on NTS availability (FY98) and results of the Halliburton treatability work. The remainder of the meeting was focused to alternative approaches to meet the program objectives. These alternatives were discussed and clarified to enhance understanding and provide for feedback. Several key discussion areas are summarized below.

1) Dr. Fred Dowsett (CDH) described the regulatory history of the solar ponds dating back to 1985. An important point was the compliance status of the ponds relative to RCRA. The DOE decided in 1985 not to apply for interim status for operation of the solar ponds, rather to close the ponds as a RCRA unit. Therefore, use of the ponds for process wastes in the late 1980's and continued use of the ponds for ITS water represent unpermitted/non-interim status operations. Loss of interim status for storage of wastes on the 750 and 904 pads on November 8, 1992, will not occur and was not an issue of concern.

- 2) There was a general openness to considering revision to the OU4 Workplan to allow use of horizontal and angle drilling techniques to minimize schedule delays in assessment. This will be worked at the staff level and presented as a Technical Memorandum to revise the Workplan.
- 3) Early start of IM/IRA Treatability Studies per the IAG detailed schedules was a point of confusion. It was agreed that the specific purpose of the studies would be worked at the staff level and recorded in correspondence from DOE to CDH and EPA.
- 4) There was considerable discussion on the alternatives for quick removal of sludge, given the unavailability of NTS and Halliburton process trains still under construction. Options which removed sludge from the ponds quickly for further storage as sludge were generally accepted. The exact nature of storage, whether in containers or as bulk, and the degree of sludge dryness or pretreatment will require further staff work. Storage of existing pondcrete triwalls according to bulk rather than container criteria was also considered feasible. Options which left sludge in the ponds longer than currently scheduled, or as interim storage, were not supported. In-situ stabilization of sludge was clearly unacceptable.
- 5) Revision of the Interim Measure/Interim Remedial Action (IM/IRA) for Building 910 evaporators and modular tanks to allow early use of the modular tanks was favorably discussed. Currently the IM/IRA links use of the modular tanks to evaporator operations, however the evaporators are lagging behind the tanks. This will be coordinated at the staff level as a change to the IM/IRA, possibly requiring public involvement depending on the magnitude of the change.
- 6) Use of solar ponds for ITS water during an evaporator failure or excessive spring storm event was discussed at length. Generally, use of the solar ponds would be considered only in an emergency event, after all other storage alternatives are exhausted. This would include priority use of B-374 evaporators, use of the tank adjacent to B-374, and full use of all three modular tanks. Such emergency use of the ponds would also require good management planning to have the modular tanks and B-374 tank at low levels prior to spring runoff season. It appeared that Pond 207B-north would be the most logical pond to use in an emergency.
- 7) There was willingness to consider revision to OU1 and OU2 IM/IRAs to utilize excess capacity in those systems for ITS water, provided technology was compatible. Use of the sewage treatment plant was suggested as a possible alternative for ITS water, as long as NPDES discharge requirements could be met.
- 8) Some alternative processing was discussed, particularly use of B-374 for existing 207C pond water and material. The idea of using ITS water to help dissolve 207C salts and provide better pumpability was an alternative variant which had not previously been identified. Further staff work is needed to determine the specific acceptance criteria for B-374 and current capacity.

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9) The potential of delisting the pondcrete, and the resultant impact on ability to ship to NTS, was discussed at length. CDH representatives provided a clear description of the criteria which would be considered in a delisting petition. This appeared to be an area which would require further staff work, but could be successful. It also was indicated that representatives from Nevada should probably be included in the effort so that the delisting would also be accepted at the receiving end if granted by Colorado.

Several additional actions came out of the discussion as listed below.

1) EG&G needs to verify current stacking arrangement of pondcrete triwalls in relation to past agreements with CDH. This needs to be determined prior to the 11/9/92 briefing.

2) EG&G needs to determine the history of the change from 750,000 gallon modular tanks to 500,000 gallon. The rationale and history behind the change was not clearly understood. This is also needed prior to the 11/9/923 briefing.

3) The appropriate regulators need to reach agreement on the proper mechanism for modification to processing plans for the sludge or pondcrete after November 8, 1992. Rocky Flats needs to know whether a change to interim status or permit modification is appropriate, or some other mechanism.

The meeting was summarized with a listing of the actions and brief discussion of upcoming briefings to DOE Headquarters and key decision points. Another meeting to update the regulators on the progress of alternative selection and SEP Program re-baselining is anticipated toward late November 1992. Overall the meeting progressed very well, with open consideration of ideas and sharing of viewpoints and concerns. All participants appeared focused toward successful resolution of the challenges facing the SEP Program.



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Attachment

cc w/Attachment:

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Solar Ponds Meeting 10/29/92

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