

17-21-10-90 -

0033097

CORRES. CONTROL

OUTGOING LTR. NO.

85 RF 2068

Rocky Flats Plant  
North American Space Operations  
Rockwell International Corporation  
P.O. Box 464  
Golden, Colorado 80402-0464  
(303) 497-7000



Rockwell International



000025641

Contractor to U.S. Department of Energy

BEST AVAILABLE COPY

DIST.	LTR.	ENCL.
DORR, J.E.		
BENJAMIN, A.		
ADAMS, M. L.		
BADER, C. P.		
CROSSLAND, W.D.		
KINZER, J. E.		
LANGHEIM, G.R.		
McNETT, J.F.		
OWEN, F.G.		
PETERSON, R. G.		
REBRO, W.L.		
SHANNON, W.M.		
SMITH, R.E.		
VEDVODA, E.		
WEIDNER, J.W.		
WESTON, W.F.		
WIEDERECHT, D.A.		
WILSON, G. L.		
WOZNIAK, B.D.		
YODER, R.E.		
YOUNG, E.R.		

JUL 24 1985

85-RF-2068

Jerry L. Bellows  
Acting Area Manager  
DOE, RFAO

U.S. ENVIRONMENTAL PROTECTION AGENCY AMENDMENTS TO THE NPDES PERMIT REGULATIONS, FEDERAL REGISTER, SEPTEMBER 26, 1985

The following information is for Mr. J. G. Stearns' attention.

The major items pointed out in your June 26, 1985, letter have been addressed and are enclosed in Attachment No.1.

A draft copy of the letter that should be submitted to EPA, Region VIII is attached.

The address is: Mr. Pat Godsil, Chief  
Compliance Branch  
Water Management Division  
U.S. Environmental Protection Agency  
Region VIII  
1860 Lincoln Street, Suite 900  
Denver, CO 80295

*C. R. Lagerquist*  
C. R. Lagerquist, Manager  
Environmental and Occupational Health

Orig. and 1 cc - J. L. Bellows  
Enc. (2)

BAKER, J. W.		
BURNETT, E. J.		
BYRNE, J.P.		
CAMPBELL, G. W.	X	X
CARNIVAL, G.J.		
CHANDA, R.N.		
ELLIS, H.R.		
HARMAN, L.K.		
HEALY, T.J.		
JOHNSON, C. H.		
KRIEG, D.M.		
LIM, B. W.		
LOUDENBURG, G.E.		
McKINLEY, K. B.		
NICHOL, W.R.		
ROBERTS, J.K.		
SMITH, M. J.		
TROELTZSCH, R.E.		
VELASQUEZ, R.N.		
WICKLAND, C.E.		

CORRES CONTROL	LTR.	ENCL.
L. Heary	X	X
D. Horabacher	X	X
R. Lagerquist	X	X
L. Potter	X	X
H. Setlock	X	X

CLASSIFICATION	LTR.	ENCL.
UNCLASSIFIED	X	X
CONFIDENTIAL		
SECRET		

AUTH. CLASSIFIER SIG.  
*C. R. Lagerquist*  
DATE 7-24-85  
IN REPLY TO LTR. NO.

TR. APPROVALS

ORIG. & TYPIST INITIALS

*LH/dlb*

ADMIN RECORD

SW-A -002869

## Attachment 1

### TOXIC CONTROL STRATEGY

The Rocky Flats Plant met the requirements of EPA's Toxic Control Strategy (Federal Register, September 26, 1984, page 38,000) when analyses of the 129 priority pollutants were done in January, 1982, and quarterly analyses of 13 heavy metals were done from May, 1981, through December, 1984.

### STORM WATER RUNOFF DISCHARGES

Background information: All storm water runoff from the most western perimeter fence, all grounds, buildings, parking lots, paved and dirt roads enter three drainages - North Walnut Creek, South Walnut Creek and the south interceptor canal. This storm water runoff is retained in Ponds A-4, B-5 and C-2 respectively. When each pond is discharged, the present NPDES permit requires sampling and analyses for non-volatile suspended solids. Upstream of the A-4 drainage, the NPDES permit requires monitoring for pH and nitrates, one conventional and one nonconventional pollutant, respectively, which are pointed out in Items V-A and V-B of EPA application Form 2c. Because of nitrate levels encountered in previous years, the Rocky Flats Plant would be designated as a Group I storm water discharger along the North Walnut Creek drainage. The other two drainages, Ponds B-5 and C-2, would be designated as Group II storm water dischargers.

Personal communication with Bob Shankland on July 18, 1985, revealed that he thinks the present NPDES permit at Ponds A-4, B-5 and C-2 are sufficient to cover our classification of storm water dischargers. Bob Shankland felt a letter, however, should be sent to his office indicating that fact. Bob also stated that EPA is understaffed and not in a position at this time to consider storm water runoff with high priority.

Section 122.26 of Federal Register, September 26, 1984, part(c) gives the Director (EPA, Region VIII) the authority to designate on a case-by-case basis what facilities should be designated as storm water dischargers. A request should be made by the Rocky Flats Plant to the Director, EPA, Region VIII. The Plant would then be required to submit as application within six months after the designation is made.

### ANTI-BACK SLIDING

This is not applicable to the Rocky Flats NPDES permit because we have not asked for less stringent effluent limitations that were present in previous NPDES permits.

DISPOSAL TO WELLS, POTW'S, OR BY LAND APPLICATION

None of the process waste at Rocky Flats is injected into wells, transferred to POTW's or subjected to land application. The spray irrigation of the sanitary treated water does not apply. The spray irrigation of the 207B North Pond west of the Plant does not apply because the water is from groundwater collecting in an interceptor system and technically could be discharged downstream under the current NPDES permit.

CHANGES TO REQUIREMENTS FOR NOTIFYING EPA OF MAJOR FACILITY ADDITIONS OR ALTERATIONS

The construction and alterations that are now being done at the 995 Building sanitary sewage plant have little or no impact on the quantity or quality of discharge and therefore notification to EPA is not required.

PROHIBITIONS ON BYPASSING TREATMENT FACILITIES

Construction activities during the week of July 15, 1985, necessitated bypassing the advanced or third stage waste water treatment facility. The quality of water for the week was:

pH range	7.0 - 7.6
average NO <sub>3</sub> as N	2.5 mg/l
average suspended Solids	3.4 mg/l

Federal Register, September 26, 1984, Part 0, p.38036 allows the permittee to bypass if the effluent limitations are not exceeded and if the bypass was for essential maintenance. However, this water was spray irrigated.

CHANGES IN PROCEDURES FOR OBTAINING PERMITS

This issue was not addressed in this Federal Register, September 26, 1984, and it appears there are no changes to obtaining an NPDES permit. The current procedure requires the permittee to apply six months in advance of the expiration date of the NPDES permit.

DRAFT

DRAFT

DRAFT

DRAFT

Mr. Pat Godsil, Chief  
Compliance Branch  
Water Management Division  
U.S. Environmental Protection Agency  
Region VIII  
1860 Lincoln Street, Suite 900  
Denver, CO 80295

#### STORM WATER RUNOFF DISCHARGES

The Rocky Flats Plant is making an attempt to comply with the storm water runoff discharge regulations that are pointed out in the September 26, 1985, Federal Register.

The present retention ponds (Ponds A-4, B-5, and C-2) collect, retain and discharge storm water runoff under the NPDES permit program. The procedures and controls that regulate these ponds should be sufficient for designating the Rocky Flats Plant as a storm water point source. If not, the Rocky Flats Plant requests that the facility be designated as a storm water point source as pointed out in Section 122.26 of the September 26, 1984, Federal Register.

Jerry L. Bellows  
Acting Area Manager  
DOE, RFAO