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United States Government

Department of

DUE DATE 8-2-91

Memorandum

JUL 28 13 AM '91 Rocky Flats

ACTION Kersh

DIST

BENJAMIN, A.		
BRETZKE, J.C.		
BURLINGAME, A.H.		
COPP, P.D.		
CROUCHER, D.W.		
DAVIS, J.G.		
EVERED, J.E.	X	X
FERRERA, D.W.		
FERRIS, L.R.		
FRAIKOR, F.J.		
FRANCIS, G.E.		
GOODWIN, R.		
HANNI, B.J.		
HEALY, T.J.		
IDEKER, E.H.		
JENS, J. P.		
KERSH, J.M.	X	X
KIRBY, W.A.		
KRIEG, D.		
LEE, E.M.		
MAJESTIC, J.R.		
MARX, G.E.		
MATHEWS, T.A.		
McCLUSKY, J.K.		
MEURRENS, B.E.		
MORGAN, R.V.		
PIZZUTO, V.M.		
POTTER, G.L.	X	X
RAFFELL, B.F.		
RANDLIN, N.B.		
SWANSON, E.P.		
VIERE, J.S.		
VILKINSON, R.B.		
WILSON, J.M.		
WONG, E.R.		
WANE, J.O.		
<u>Harple</u>	X	X
<u>Jobbs</u>	X	X



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JUN 28 1991

WMED:JR:5059

EG&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

Analytical Methods and Detection Limits for National Pollutant Discharge Elimination System Permit Analyses

John M. Kersh, Associate General Manager
Environmental & Waste Management
EG&G Rocky Flats, Inc.

As you are aware, the recent signing of the Federal Facility Compliance Agreement (FFCA) between the U.S. Department of Energy, Rocky Flats Office (RFO) and the United States Environmental Protection Agency Region VIII (EPA) to address past violations of the Rocky Flats National Pollutant Discharge Elimination System (NPDES) permit has resulted in the imposition of additional monitoring and reporting requirements for surface water discharges from the Plant. Among these are requirements that certain outfalls be monitored for heavy metals. An interpretation of the new FFCA monitoring requirements has been provided to RFO by EPA staff; this is attached and has previously been shared with your staff.

In reviewing the attached requirements, your staff has notified us that the detection limits specified by EPA in the attached letter may not be attainable by the current analytical methodologies employed by Rocky Flats, that attempting to meet these limits may result in inordinately long laboratory turnaround times for metals analyses, and that these detection limits may be overly strict given the discharge limits imposed by the FFCA. Our staff has transmitted this concern to EPA, and EPA has expressed a willingness to review the matter with us. We ask that your staff prepare a compilation of methods currently employed by Rocky Flats for heavy metals analyses in surface water and the detection limits and turnaround times for these analyses. We will then share this compilation with EPA staff for their review prior to our meeting with them to discuss the issue.

It is our understanding that Rocky Flats is acquiring the capability to analyze heavy metals via inductively-coupled plasma/mass spectroscopy (ICP/MS) which would allow both lower detection limits with reasonable turnaround time. We would like to explore with EPA the possibility of using ICP/MS technology in our NPDES analyses, in turn assisting EPA with the development of a final NPDES method for this analytical technique. As part of the aforementioned compilation, we would like your staff to include a prospective timeframe for bringing the ICP/MS unit on-line, as well as an assessment of the unit's analytical capabilities. We would like your staff to prepare the aforementioned items for transmittal to EPA within fifteen days of the receipt of this memorandum.

In a related matter, my staff has recently been working with yours in performing a cursory compliance audit of the Clean Water Act program. As a result of this audit, we received anecdotal information that some of the methods used in performing NPDES analyses may

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J. M. Kersh
not conform exactly to those prescribed in the Code of Federal Regulations (CFR). 40CFR Part 136 specifies the methods to be used in performing NPDES analyses, and requires explicit approval from EPA for deviations from these methods. We have every confidence that data being submitted to EPA pursuant to the requirements of the NPDES permit are accurate and complete. However, we would like to assure conformance with Federal requirements to the greatest degree possible. As such, we would like your staff to review the methods currently used to perform NPDES analyses, and to document any deviations from the methods prescribed in the CFR. It is our intent to share this information with EPA for their review and, hopefully, approval of our NPDES analytical methods. We would like your staff to perform their review of current NPDES analytical methods and submit the results of the review to us within thirty days of receipt of this memorandum.

If you have any questions regarding our requests, please call me or Tom Lukow of my staff at extension 4561.



David P. Simonson
Assistant Manager
for Environmental Management

Attachment

cc(w/o Attachment):
R. Shankland, U.S. EPA Region VIII
T. Lukow, RFO
J. Rampe, RFO