



**Rocky Flats Citizens Advisory Board
Recommendation 2004-4**

Comments on the 903 Pad Lip Area Interim Measure/Interim Remedial Action

Approved May 6, 2004

Letter to:

Mr. Frazer Lockhart
U.S. Dept. of Energy
Rocky Flats Project Office
10808 Highway 93, Unit A
Golden, CO 80403

Mr. Steve Gunderson
CDPHE - HMWMD
4300 Cherry Creek Drive South
Denver, CO 80246

Mr. Mark Aguilar
U.S. EPA, Region 8
999 18th Street, Suite 300
Denver, CO 80202

Dear Mr. Lockhart, Mr. Gunderson, and Mr. Aguilar:

The Rocky Flats Citizens Advisory Board appreciates the opportunity to review and comment upon the draft Interim Measure/Interim Remedial Action (IM/IRA) for IHSS Group 900-11 (903 Lip Area and Vicinity, the Windblown Area and Surface Soil in Operable Unit 1 [881 Hillside]) dated April 26, 2004.

I. The Board supports the Site's decision not to cover 190 acres in the Windblown Area with dirt. The Board thinks the idea is neither practical nor workable. In addition, covering the land would cause irreparable ecological damage.

II. The Board has several questions and comments on the proposal to remediate the Individual Hazardous Substance Site (IHSS) group. In particular we have concerns about the adequacy of sampling that has been done for radionuclides in and east of the Outer Lip Area and the Windblown Area. We also want assurance that the sampling in the area immediately surrounding the planned remediation area is adequate to determine that all areas over the soil action levels for radionuclides have been located. Toward that end, we make the following recommendations, comments, and requests for more information:

A. We recommend additional sampling be done in the area immediately surrounding the planned remediation area, as shown on the map labeled "Sampling and Kriging Results for the IHSS - 155 and Inner Lip Grid," dated April 12, 2004. There are obvious white spaces on the map where the Board thinks more sampling for plutonium and americium needs to be

completed. There are also sparse sampling data in areas where the probability of contamination is shown to be between 0 and 0.1 and between 0.1 and 0.2 on the map. We recommend additional samples be taken for plutonium and americium in these areas to increase confidence that all areas of surface soil contamination greater than the soil action levels have been found.

B. On the map referred to in Paragraph II.A., we note that the following appears in the legend: "Disclaimer: neither the United States Government nor Kaiser-Hill, LLC, nor CH2MHill nor any agency thereof, nor any of their employees, makes any warranty, express or implied, or assumes any legal liability or responsibility for the accuracy, completeness, or usefulness of any information, apparatus, product or process disclosed, or represents that its use would not infringe (on) privately owned rights." We noted that this statement appears on many maps and ask that you provide a justification for this statement or remove it entirely.

III. The Board is concerned that the confirmation sampling plan is not contained in the draft IM/IRA, though Site staff provided an explanation of the confirmation sampling plan at our meeting in April. Confirmation sampling would be done to determine how much contamination remains after remediation of each grid area. We understand that confirmation sampling would be done for each 42-foot-square area of remediation. We make the following recommendations:

A. The confirmation sampling plan should be included in the IM/IRA for the IHSS.

B. We want to know the basis for the confirmation sampling plan, as discussed at our board meeting.

IV. In addition, Board Members are concerned about the migration of plutonium and americium downslope into Woman Creek drainage, the C series ponds, and South Interceptor Ditch (SID). To that end, we make the following recommendations:

A. Before remediation begins, we ask the Site to analyze core samples of the sediment in Woman Creek and the C-series ponds. If the sediments are shown to contain contamination in excess of the radionuclide soil action levels for plutonium and americium, then the sediment needs to be cleaned up.

B. We also ask that monitoring of the sediments in Woman Creek and the C-series ponds be included in the post-remediation and post-closure monitoring plan. We ask that the public be notified of any monitoring results that indicate there is migration of radionuclides into Woman Creek during the post-remediation and post-closure periods.

C. We also ask that particular attention be given to post-remediation monitoring of the surface water in Woman Creek and the ponds to determine if radionuclides are migrating into Woman Creek. We ask that the public be notified of the results.

V. The Board is concerned that the revegetation of the disturbed area provide erosion control and that the revegetation itself be acceptable to the U.S. Fish and Wildlife Service as habitat. We, therefore, recommend that the Site work with the Fish and Wildlife Service to determine the appropriate climax habitat.

VI. The Board is concerned that the sampling plan for the East Firing Range is not explained in the document. We recommend that the sampling plan for the East Firing Range be included in the final IM/IRA for the IHSS group, and that the sampling plan be open for public comment.

VII. There are some areas of the IHSS addressed in the IM/IRA that overlap areas that are prone to landsliding and soil instability. The Board is concerned that in the future continued erosion of these areas could expose subsurface contamination above the surface radionuclide soil action levels and provide a potential pathway for contamination to reach the surface.

We, therefore, recommend that in any areas where slope instability overlaps subsurface contamination greater than three (3) feet, the contamination be removed to levels consistent with the radionuclide surface soil action levels.

Again, thank you for the opportunity to comment on this document. We respectfully request a direct response to this recommendation outlining the disposition of our comments.

Sincerely,

Victor Holm
Chair

cc: Norma Castaneda, DOE-RFPO

The Rocky Flats Citizens Advisory Board is a community advisory group that reviews and provides recommendations on cleanup plans for Rocky Flats, a former nuclear weapons plant outside of Denver, Colorado.

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