Environmental Information Network, (EIN)
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January 25, 2015

Rocky Flats Stewardship Committee
c/o David Abelson
POB 17670
Boulder, CO 80308-0670
Via email: dabelson@rockyflatssc.org

To the Members of the Committee:

Mr. Abelson, please see that this is provided to members of the committee for the Monday 1/26/15 meeting. It is with deep concern that we write to you regarding the proposed prescribed burn on the defunct Rocky Flats Nuclear Weapons Facility property, referred to as: "USFWS' Proposal to Conduct a Prescribed Fire at the Rocky Flats National Wildlife Refuge." Burning is not the solution. It illustrates that Rocky Flats is still the "gift that keeps on giving" as a bad neighbor.

This cannot be treated as any other site. The buffer zone has not been cleaned up, and many onsite areas have persistent contamination, hot spots, and burial zones. In the 1989 EINNEWS, there was an article about a haystack fire that occurred offsite, on the east side of Indiana Street. After we raised the alarm with the Colorado Dept of Public Health and Environment, the ash from this fire was tested and found to contain 219.5 times background plutonium. We put out a cautionary memo to the local fire departments that "spread like wildfire" according to Cherryvale FD. Their equipment was tested and found in need of decontamination along with their fire gear/trousers.

What is the enhanced monitoring plan? Were you aware that 1.5 Curies of Plutonium were redistributed in one 500 year flood event in May of 1991? As the former DOE Technical Review Committee Chair, Paula reminds you of the high ground water table and lateral seepage problem found at this site, which makes it a dynamic site, rather than static.

Have any further Aerial Gamma Surveys been conducted since 1989? If so, have they been declassified? PROVE to us that this site's contamination is not continuing to migrate into the community. Do a new Aerial Gamma Survey from Highway 93 to Wadsworth, and Highway 128 to Leyden with wider photopeak windows to increase sensitivity for gross gamma and americium specific scans. Conduct a burn box test with plants from the area that include the roots, without washing the vegetation first to negate the test.

The April 2000 test burn was conducted regardless of strong community opposition. The supposed testing of the area was apparently done by culling previously existing records rather than fresh sampling. As stated by RFETS, "the burn presented an opportunity to better understand re-suspension rates and erosion potential following fires."The time for using the communities as guinea pigs is over. The Colorado area has had other large wildfires that allow opportunity to study them, that do not have potential for radioactive releases. To our knowledge, there were no actual health monitoring done on surrounding residents.

Please see the attached account from the **Earth Island Journal article** from 2000 titled: Stop the Nuclear Brushfires. There was a Channel 7 KMGH news crew at our home when this burn occurred. They clearly saw the hand held RadAlert Geiger counter counting UP when the smoke reached us. They became alarmed and fled to their van immediately and left the area. What about those people outside with no notice? Link: http://www.earthisland.org/journal/index.php/eij/article/stop_the_nuclear_brushfires/

The Rocky Flats SF6 Meteorological Trace Gas Study illustrated that within a 24 hour period, effluent released from Rocky Flats travelled all the way north past Fort Collins, west to the Continental Divide, South to Colorado Springs, and east out to the plains – largely touching the ground the entire time. That tells us that this is a direct hit to the community, to those within breathing distance.

Citizens are not allowed to have back yard trash incinerators due to air quality concerns. The volume of smoke generated by such a burn is hazardous for anyone in the area, especially those with respiratory issues. Add 50+ years of operations with industrial airborne releases of plutonium, americium, uranium, beryllium, and other contaminants, with resuspension in the area, and this should give cause for an abundance of caution in utilizing burning vegetation. Other options should be seriously considered BEFORE arriving at the option of burning. There are new developments that are situated much closer to this area now, than there were 14 years ago – which requires an even greater reason to NOT burn.

Rocky Flats land applied or "spray irrigated" radiotoxic waters to the lands surrounding the facility for many decades, without regard to the uptake in plant matter, lateral seepage, and impacts of sheeting off to public waters. Rockwell International pled guilty to these US Clean Water Act violations in 1991. We urge you to show caution, as this is no regular or benign burn site – its malignant. How many more cancers will you cause by more releases from this site? It may be business as usual to you, but it is not to those impacted by this facility.

We would appreciate a response to our comments, suggestions, and questions.

Sincerely,

Paula Elofson-Gardine Susan Elofson-Hurst

cc: Joan Seeman
Greg Marsh
Dr. Harvey Nichols
Dr. LeRoy Moore
Josh Schlossberg
Mike Ewal
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Mickey Harlow
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Stop the Nuclear Brushfires

DOE Plans to Burn Radioactive Fields at US Nuclear Sites

BY *PAULA ELOFSON-GARDINE & SUSAN HURST*

For 50 years, the Department of Energy (DOE) has cut and mowed the vegetation around its nuclear facilities. In 1999, the DOE announced a policy change: henceforth, the National Forest Service (NFS) would use prescribed burns to clear vegetation surrounding DOE nuclear facilities at Los Alamos, Hanford, Idaho National Nuclear Engineering Lab (INNEL), Rocky Flats and Savannah River.

Despite pleas by local residents to consider alternatives, the DOE insists on promoting burns over mowing, cutting or using grazing animals to control the vegetation. Their environmental managers

claimed that burning would reduce the vegetative buildup (called "thatch"), thereby reducing fuel load in the event of natural fires. (Ironically, an earlier Rocky Flats burn failed to reduce the thatch.)

It would appear that these burns are actually calculated to rid these sites of contaminated vegetation to prepare them for rapid rehabilitation and future development. Realistic timelines for cleaning up the nuclear sites have been scrapped, allowing DOE to conduct "down and dirty" cleanups in order to "return" the land to the public as quickly as possible for redevelopment. When cleanup time is reduced by 50 years, corners are cut. Burning vegetation is a simple way to remove widespread contamination, rapidly rehabilitating these Superfund sites in the eyes of local governments and developers. Unfortunately, this strategy merely moves airborne contamination off-site into communities, exposing sensitive populations.

Colorado Senator Wayne Allard and Representative Mark Udall proposed designating the Rocky Flats Nuclear Weapons Facility buffer zone as a "wildlife refuge." Allard and Udall announced their proposal last September at Colorado's Rocky Flats Superfund Site (while standing in the main plutonium nitrate field, where plutonium wastes have been slowly leaking from evaporation ponds for more than 40 years). If approved, the 6,000-plus-acre nuclear buffer zone surrounding Rocky Flats would be fitted with hiking trails and opened up for field trips to allow school children to observe "wildlife habitat." But there is a problem with the plan.

Burning contaminated vegetation releases radioactive smoke that can be inhaled, exposing lung and body tissue to damaging alpha radiation. Tissue samples taken from a herd of cattle that grazed on contaminated fields near the Rocky Flats plant for only three months were found to contain higher amounts of radioactivity than herds that grazed year-round at the Nevada Test Site.

Rocky Flats is the only DOE nuclear facility with a one-mile buffer zone – the only protection for the 3.8 million-plus residents of metropolitan Denver.George Bush is currently considering a national policy promoting prescribed burns for vegetation control across the US. Congress should act to see that prescribed burns at nuclear sites are permanently banned.

In 2000, the NFS was advised to cancel a scheduled burn at Los Alamos because of the danger posed by high winds. The NFS ignored the warnings and ignited a catastrophic wildfire that raged for days. DOE officials subsequently claimed that the fire had contributed no "significant" contamination to downwind communities (the same communities that have experienced more than 50 years of releases from the facility).

In April 2000, after an outcry from nearby residents, a 500-acre prescribed burn at Rocky Flats was reduced to a "test burn" of 50 acres. Rocky Flats personnel refused to pre-test the vegetation in a burn-box under controlled laboratory conditions to determine what kind of contamination might be released in the ash. Ash is known to act as a concentrating mechanism for contaminants.

On April 6, 2000, the vegetation was burned in the open, allowing a huge cloud to drift up the canyons, north to Boulder, and along the Front Range, beyond Golden and Lakewood. Despite pleas by residents, the ash was not tested afterward.

A KMGH Channel 7 film crew was taping an interview at the Environmental Information Network (EIN) office that morning when NFS personnel started the burn. Soon, a giant brown and gray cloud lifted into the air and began moving toward the suburbs. In less than 40 minutes, the cloud traveled 14 miles through the metro area, south to Lakewood. The EIN phone began ringing nonstop with calls from alarmed residents. Many local citizens reported that the smoke left a "metallic taste" in their mouths (a hallmark of uranium or plutonium exposure).

We have a hand-held real-time Radalert radiation monitor that measures alpha and beta particles, gamma and x-rays. Before the test burn, local background radiation (much of it a legacy from aboveground nuclear testing and over 50 years of accidents and operational releases from Rocky Flats) was previously established as between 8 to 15 counts per minute (cpm) on this monitor.

Our radiation readings quickly reached the highest level of detection (19,999 cpm). The TV crew was shocked to see that the thick smoke that filled the air and smelled like a forest fire was also activating our radiation monitor, confirming that the smoke was, indeed, radioactive.

The readings that remained stable enough to be kept as good data exceeded 4,260 cpm – an extremely high reading by any standard. The next day's readings subsided to 1,147 cpm and steadily declined over the next few weeks. Nearly a year after the burn, background radiation levels in the Denver-Boulder metro area remained about 10 cpm higher than before the burn.

Some of this may be attributable to the prescribed burn, but other radiation may be the result from the ongoing demolition of old concrete buildings at the Rocky Flats plutonium facility. Concrete acts as a sponge for radiation and the dust from demolition is spread by the wind. Concrete and metals are both subject to deterioration from radiation – which is why the Chernobyl concrete sarcophagus is crumbling.

Prescribed burns must be banned at all nuclear facilities. Well-funded citizen radiation monitoring networks need to be established around these facilities. Instead of calling these reclaimed sites "wildlife refuges," these feel-good nuclear petting zoos should be renamed "Restricted Access Nuclear Reserves" – with no trails and no tours.

Paula Elofson-Gardine is the executive director of EIN, a nonprofit environmental education organization. The Colorado Business Magazine saluted Elofson-Gardine as "knowing more about Rocky Flats than the DOE." Susan Hurst, EIN's publications director, reported Rockwell International to the FBI for using radioactive wastewater to irrigate the Rocky Flats buffer zone. Contact: EIN, PW Box 280087, Lakewood, Co 80228, (303) 233-6677. We accept contributions to support our work.