Mary (Mickey) Harlow

6/1/2014

To: Mr. Scott Surovchak

David Ableson, Executive Director, Rocky Flats Stewardship Council

SUBJECT: Major Storm Event of 2013, Public Information Office, Contaminated Groundwater leaving the Site, Original Landfill, Cost of Institutional Controls, VOC's Contributing to the Ozone.

Mr. Ableson, please post this paper to the public comment section of the Rocky Flats Stewardship Council Web Page.

<u>Comment</u>: I am very troubled by the fact that Rocky Flats history is already being re-written. When I read in the June 1, 2014 Edition of the Denver Post that the DOE Site Manager states that "Rocky Flats was nothing but a fancy machine shop" I was shocked. I am sure that some new residents to this area might believe that. I don't think the sick workers and the communities That had to replace their water supplies and protect their water supplies would agree with this light hearted definition. Twenty Five years after the FBI raid and we are still cleaning up. The Central Operating Unit is still listed as a Superfund site, plutonium, americium, uranium; volatile organic compounds are still on the site and they do not make good neighbors. The fancy machine shop was part of the nuclear legacy of the Cold War. It made the triggers for nuclear bombs.

MAJOR STORM EVEN OF SEPTEMBER 9-12, 2013

<u>Question</u>: Has the Department of Energy made an effort to provide a public information/telephone number for communities where citizens and officials can call and get Information on what is happening at the site in the event of a major flood or other catastrophe at the Rocky Flats?

At a previous Stewardship Council meeting I stated that it was important for the Department of Energy to put in place a Public Information Office so that in the case of a major event at Rocky Flats like the recent flooding in 2013, the downstream communities and residents have a contact person and number to call information. I understand that DOE Site Manager, Mr. Surovchak, was at Pinellas during the storm event and the government may have been shut down during this time period. However, the contamination at Rocky Flats was not shut down and citizens were worried about the water scouring the site and bringing the contamination in the muddied runoff water and the seeps surfacing from contaminated groundwater into their community reservoirs and their subdivisions. The east spray fields and their contamination were moving also with the sheet flow moving across the site.

<u>Question</u>: Colorado Department of Health staff braved the storm water and was able to grab samples and have them analyzed. DOE states in the 2013 Annual Report that access to various areas of the site were unsafe and restricted by local authorities during certain periods. Why did the DOE and Stoller employees not make an effort to grab samples and check on the

samplers when the event first started Wednesday?? Samples that were found int sample bottles later were discarded. This does not make sense for me.

There needs to be a separate section in the annual report discussing the failure of the automatic samplers to handle the volume of runoff, their damage from water and debris and the small sample bottles filling so quickly that they were overflowing. The flow monitors were not working and therefore there is no data available to determine the exact amount of water that left the site, diluted by storm water.

Question: Has the DOE prepared a lessons learned from this storm event that can be added to the annual report? Has there been an upgrade to the samplers so that they can handle a major storm event? Have the flow monitors been replaced in both drainages with more robust models? DOE further states that the automatic surface water monitoring network performed as well as would be expected. The expectation in the community was that they would do the job they were designed for. This statement glosses over the fact that the samplers failed and no monitoring data or laboratory analysis data is available for this major event. I have heard DOE say in the past that some things are an acceptable risk, perhaps the effects of another large storm event on the samplers and monitors as they now exist are in this category.

GROUNDWATER CONTAMINATION MOVEMENT

Summaries of historic Rocky Flats groundwater monitoring data completed previously by two researchers show localized areas of elevated radioactivity in groundwater at or near past Rocky flats disposal sites, near the solar evaporation ponds(nitrate and uranium plume) and the east spray fields. Volatile organic compound plumes have been identified in the 881 Area, the present landfill, the 903 Pad trenches, Ryans Pit, around a former carbon tetrachloride tank, the former mound burial area and under the industrial area of the plant where nearly 800 structures were located.

QUESTION:

- 1. Has any effort been made to measure the movement of groundwater contaminated plumes to the East of Rocky Flats and off the site since the large amount of water that inundated the site during the massive flood? Between 1992 and 1994 scientists detected plutonium levels exceeding state standards for groundwater in samples from one shallow groundwater well next to Walnut Creek at Indiana. The sediment in the well was cleaned out and in 1994 plutonium level dropped. Scientists believed that heavy rains caused contaminated sediment to enter the well.
- 2. Findings of the Rocky Flats Historical Public Exposure Studies have concluded that contaminated ground water from Rocky Flats would take from 30 to 300 years to travel through various geologic pathways eastward to Indiana Street. Rocky Flats groundwater monitoring wells including six wells along the plants eastern boundary at Indiana Street were used in the past to monitor for movement of the plumes. Since the monitoring points of compliance have been moved inward closer to ensure that the contaminated groundwater plume is not leaving the site in either the Walnut or Woman Creek drainage? I believe that it is necessary to do so. Source: Colorado State Government: Movement of Contaminated Groundwater at Rocky Flats.

Original Landfill

Questions:

- 1. What are the annual maintenance costs for repairs to the Original Landfill from closure to date? Based on the many contact records that have been made since official closure would it have been more cost effective to clean up the Original Landfill than to continually pay to add movement measurement meters, fill in cracks and slumps, put in channels, hire a engineer to come up with a plan for future maintenance of the landfill? Fish and Wildlife suggested characterizing and disposing of waste in the landfill.
- 2. Is it possible to provide a section in the annual DOE Site report that delineates the cost on a yearly basis for all the institutional controls, and monitoring, staffing, etc.?

GROUNDWATER CONTAMINATED WITH VOC'S

Questions:

- 1. With the volume of water being run through the treatment cells at the East Trenches, Solar Ponds and the Mount Treatment site, large amount of VOC's is being sir stripped and allowed to flow out into the atmosphere. Has the DOE measured the amount of VOC's in the treated water before it goes into cells and based on the 20 gym, 24 hour pumping, and what is the volume of VOC's that is being air stripped and put into atmosphere per hour/per day.
- 2. Does the Federal Government have to report their emissions to EPA on a scheduled basis or are they exempt? These releases are close to the Ozone monitor located on the North side of Rocky Flats just east of the wind research laboratory along Highway 128 which has recorded some of the highest ozone recordings in the past.
- 3. Some days do not receive enough sun light to effectively run solar panels. With the 20 gpm submersible pumps running continuously, does the DOE monitor the energy provided by the solar cells to run the equipment, are there down times on the pumping and is there backup power available?