

# ROCKY FLATS STEWARDSHIP COUNCIL

P.O. Box 17670  
Boulder, CO 80308-0670  
www.rockyflatssc.org

(303) 412-1200  
(303) 412-1211 (f)

Jefferson County -- Boulder County -- City and County of Broomfield -- City of Arvada -- City of Boulder  
City of Golden -- City of Northglenn -- City of Westminster -- Town of Superior  
League of Women Voters -- Rocky Flats Cold War Museum -- Rocky Flats Homesteaders  
Karen Imbierowicz

May 5, 2008

Mr. Michael Owen  
Director, Office of Legacy Management  
Department of Energy  
1000 Independence Avenue, SW  
Washington, D.C. 20585

Dear Director Owen,

On behalf of the Board of Directors of the Rocky Flats Stewardship Council I am writing to express our deep concern regarding the Department of Energy's decision to destroy documents that were once housed at the Front Range Community College Library in Westminster, Colorado. The Stewardship Council had hoped to be able to resolve our differences with your staff but we have been unable to reach agreement on preserving these important documents.

As the DOE-designated Local Stakeholder Organization (LSO) for Rocky Flats one of our primary missions is to work with DOE to ensure information is publicly available. The attached letters from the University of Colorado Archives and Front Range Community College Library make clear that these documents have been and remain critical to understanding the history of the site. According to the CU Archives, these documents "not only have an abiding historical value, they are also a vital resource for future environmental research."

While some of these documents will be preserved as part of the official Administrative Record, many others are not part of the Record. Some documents in the collection we are seeking to preserve are the only copies in the DOE system, so in destroying these documents DOE would be deleting from the public record information that was once readily available to the public. In addition, this collection provides a broader understanding of Rocky Flats than the records that comprise the Administrative Record. The Administrative Record – a collection of documents which form the basis for an agency's decision – is an important accounting of the cleanup, but it is not comprehensive. This collection of documents, which include community-directed studies, Colorado health department records, engineering data, municipal monitoring data, extends well beyond the narrow bounds of the Administrative Record. Accordingly, these documents provide information that is central to the history of the site, not just the environmental remediation project.

DOE is also seeking to destroy documents at a time when former workers are struggling to show a direct link between their illnesses and exposures received while working at Rocky Flats. It is unknown whether any of these documents could help workers prove their case. Taking this step without first providing workers and their families with the opportunity to review the documents might increase the workers' burden.

Maintaining these documents in Colorado is of great importance. Providing access to electronic copies on the web and maintaining hard copies at a storage facility in West Virginia is valuable but does not obviate the need to maintain hard copies in Colorado. Among other things, electronic formats change which may make electronic copies largely unavailable. Federal regulations do not ensure these documents will not one day be destroyed and history is replete with many documents vital to our country's history being destroyed. Destroying these documents, especially those which are the only copies in the DOE system, would be unconscionable.


We understand DOE's reason for destroying the documents is that personal information was found in one or more documents. Clearly, personal information should not be made public. Yet, the decision to destroy these documents is not the proper response to what may be a limited problem. Gary Morrell, the Front Range Community College Library librarian who managed these documents for DOE, believes the documents that contain personal information is rather limited and can be easily narrowed. By using the Library's list of documents to identify potentially problematic documents makes it easier and less costly for DOE to remove the personal information prior to making these documents once again public.

Despite repeated requests by our staff, DOE has yet to specify in writing the legal and regulatory basis for destroying these documents. DOE has likewise not explained how directives the Administration has issued are reconciled with federal regulations requiring documents be maintained. As the LSO for Rocky Flats we request you make this important information publicly available and provide a full accounting to the Stewardship Council.

DOE should move forward with its initial plan to give these documents to the CU Archives, while working with the Archives to ensure no personal information is transferred to CU or that CU otherwise does not make documents public until it verifies that personal information will not be released. The CU Archives has pledged to work to make sure no personal information is made public and is experienced in handling sensitive information.

We look forward to working with you to resolve these important issues.

Sincerely,

  
Lorraine Anderson  
Chairman

Cc: Senator Wayne Allard  
Senator Ken Salazar  
Representative Mark Udall  
Representative Ed Perlmutter



Archives  
184 UCB  
Boulder, Colorado 80309-0184  
303-492-7242  
Fax: 303-492-3960

March 25, 2008

Ms. Lorraine Anderson  
Chairman  
Rocky Flats Stewardship Council  
PO Box 17670  
Boulder, CO 80308

Dear Ms. Anderson:

The Archives, University of Colorado at Boulder Libraries is very interested in acquiring the entire holdings of the Rocky Flats Reading Room. We have been in contact with Bob Darr, Rocky Flats Public Affairs, at the Department of Energy, since September 2007, attempting to acquire these materials.

The Rocky Flats Reading Room materials would provide a vital public record component to the already voluminous holdings held by the Archives on the Rocky Flats Nuclear Weapons Plant. The Archives seeks to acquire, preserve and make available materials that include all views and constituencies regarding Rocky Flats. We already hold the records and papers of a number activist organizations, watchdog groups, unions, public officials, as well as individual workers, researchers and officials. The amassing of these papers in one location will render future research far more convenient to scholars, students, public officials and the public at large.

The maintenance of these records in a convenient place in Colorado is of great importance to the State of Colorado, to the local governments and constituents that were affected by Rocky Flats, and to the local academic community. The Rocky Flats Nuclear Weapons Plant was of vital importance to the Cold War and to the economy of the region during the last half of the 20<sup>th</sup> century. Rocky Flats also became a political issue that excited considerable activism and activity at all political levels in Colorado. However, these records do not only have an abiding historical value, they also are a vital resource for future environmental research to all downstream citizens, and the municipal and county governments and State that serves them. These records should be permanently available to the public.

While the Federal Government houses many of these records in an assortment of places in the National Archives, their permanent availability may not be certain. The National Archives must periodically dispose of federal records in accordance with a wide array of considerations. Many researchers have discovered to their dismay that the National Archives routinely disposes of entire record groups with notification that can escape notice. Hundreds of linear feet of the US Navy Research Laboratory's World War II files were destroyed by the National Archives in the 1990s. Many captured records held by the National Archives of Imperial Japan were controversially returned to Japan. Beyond mistakes and disputes, federal records management regulations are not eternal. Standards may change over time, altering the status of records once thought to be permanent. Materials in the National Archives are not necessarily permanently held.

Paper files, while space-consuming, are permanent records, while scanned and computer read materials may not necessarily be permanent. The upgrading and shifting of computer platforms can render long-term availability of such scans and databases problematical. Secondly, the cost of

scanning documents requires selectivity, which the storage of the entire collection will not. Thirdly, researchers can look at all of the papers in a file and leaf through a book or report much more quickly than they can through scanned material on a computer screen.

If the copied papers of the Rocky Flats Reading Room were destroyed the records they represented would need to be sought out, if available, from a wide array of agencies and government departments, located throughout the country and research in these materials would be stymied.

At this point in time, the Department of Energy is concerned about the possibility that personal information may be present in a small number of files. This concern is placing the collection in jeopardy. We would like to allay such security concerns. The Archives, University of Colorado at Boulder Libraries, has long-term experience in a wide variety of restricted records. In the past, the Archives has established security protocols with the US Senators and Representatives, University Administrators, Social Scientists, and human rights organizations, each requiring a number of different types of restrictions. The Archives Staff are wholly conversant, and capable of administering Privacy Act material. We are willing to work with DOE to set up proper security protocols to ensure documents will not be made available until DOE can clear them.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. P. Montgomery', with a stylized flourish at the end.

Bruce P. Montgomery  
Associate Professor and Faculty Director of Archives

**Westminster Campus**

3645 West 112th Avenue  
Westminster, CO 80031-2100  
303-466-8811  
Fax: 303-466-1623  
<http://frontrange.rightchok>

April 3, 2008  
11245 Wyandot St.  
Westminster, CO 80234

Lorraine Anderson  
Chairman  
Rocky Flats Stewardship Council  
PO Box 17670  
Boulder, CO 80308

Dear Ms. Anderson:

As I discussed with David Abelson on the phone last Tuesday morning, I am concerned about the possible destruction of the documents formerly housed in the Rocky Flats Reading Room. I believe that many of these documents cannot be found elsewhere, so their destruction would be an irreparable loss. Even if other copies exist, they would not be as conveniently accessible for anyone doing research on Rocky Flats. Researchers might have to comb through the collections of various government departments and agencies to find the same materials.

I was the Rocky Flats Reading Room librarian from February 2000 until the Reading Room closed in the Fall of 2007. While I worked in this position, other Rocky Flats reading rooms in the Denver area were being closed down. Although I had been told that each of the reading rooms contained the same documents, I discovered this was not the case. As the other reading rooms closed, I collected and consolidated these collections into Front Range's. I found that many of the documents were not duplicates, and that individual reading rooms contained materials not available in other reading rooms. These reading rooms included the ones at the Standley Lake Library of Jefferson County Public Library, the Colorado Dept. of Public Health and Environment, and the Rocky Flats Citizens Advisory Board; and in addition I accepted discarded documents from the Mamie Doud Eisenhower (Broomfield) Public Library's Rocky Flats collection.

Although some of the documents formerly housed in the Reading Room are available electronically and/or in the CERCLA Administrative Record (which used provide access to the full text of documents online), there are also many that are not. These include studies done by agencies other than the DOE, such as the Colorado Dept. of Public Health and Environment, the Army Corps of Engineers, Radiological (now Risk) Assessments Corp.; Roy F. Weston, Inc.; Wright Water Engineers, and others.

There are various reasons why I suspect that not all pertinent information is available in the CERCLA Administrative Record (AR) or on the DOE's Information Bridge ([www.osti.gov](http://www.osti.gov)), and some unique or important information is contained in the documents which are not included in

**Westminster Campus**

3645 West 112th Avenue  
 Westminster, CO 80031-2  
 303-466-8811  
 Fax: 303-466-1623  
<http://frontrange.rightchoi>

the AR. The legal department at Rocky Flats routinely used the Reading Room because it contained documents and information not available to them at Rocky Flats. Also, I consolidated documents from other reading rooms, which were not duplicates of what was in the Front Range Reading Room's collection. (In other words, the process of making sure that each reading room received the same documents was imperfect—some documents reached certain reading rooms but not others.) Although other copies of these documents might exist with their originating agency, they will not be as readily accessible or conveniently collected in one location. Some of them may be available in the Rocky Flats Cold War Museum collection (donated by the Colorado Dept. of Public Health and Environment), however this collection is not currently available, and unless the museum is able to procure funding, might never be publicly available.

In addition to the documents which the DOE is legally obligated to maintain and which are (or were) available electronically, there are other kinds of documents which might not be particularly important from the DOE's standpoint but which could be valuable to researchers, for historical, sociological, scientific, and environmental information. These include:

Geologic and seismologic investigations for Rocky Flats Plant for U.S. D.O.E. by Dames and Moore Call No.: QE92.J4 G4 1981 (Two instructors at the Colorado School of Mines came to consult this a few years ago because they said it was the only study they could find which substantiated a fault line running beneath the former Rocky Flats Plant site.)

Sitewide Geoscience Characterization Study QE92 .R624 S584 1995

TRAC (Terrain-responsive Atmospheric Code) Reports QC996 .T477

An Archaeological and historical survey of selected parcels with the Dept. of Energy Rocky Flats Plant, northern Jefferson County, Colorado Jan. 1, 1989 Call No.: E78 .C6 A734 1989

Aerial radiological survey(s) of the United States Dept. of Energy's Rocky Flats Plant (1981, 1989) Call No. G70.4 R624

Historic American Engineering Record No. CO-83 for the Rocky Flats Historic District Sept. 1998 Call no.: F777 .H478 R635 1998

Engineering Survey and Report for Santa Fe Operations Office of the United States Atomic Energy Commission on the location and site for Project Apple Call No.: HD9744. R624 E545 1951

Environmental Surveillance Report on the U.S. Dept. of Energy Rocky Flats Plant Colorado Dept. of Public Health and Environment Call No.: TD181 .C62 G64

**Westminster Campus**

3645 West 112th Avenue  
Westminster, CO 80031-21  
303-466-8811  
Fax: 303-466-1623  
<http://frontrange.rightclick>

Great Western Reservoir sediment core data and graphs Call No.: TD427 .R3 G743 1985

U.S. Army Corps of Engineers review of pre-feasibility study Great Western Reservoir surface water interceptor system Call no.: TD427 .R3 G744 1989

City of Broomfield Environmental Monitoring Reports 1989-1993 Call No.: TD181 .C62 R335

Radiation Data Monthly Report (City of Westminster) 1988-1997 Call no.: TD181 .C62 R337

Data Quality Assessment Reports Rocky Flats Environmental Technology Site Call No.: TD178.3 .R624 D383

Blue Ribbon Citizen's Committee reports Call Nos. HD9744 .N83 B48 1983 and HD9744 .N833 L67 1983

Final Report of the Governor's Rocky Flats Scientific Panel on Monitoring Systems October 1990 Call No.: TD181 .R624 F55 1990

Standley Lake fish toxics monitoring report January 1990 Call No.: TD427 .R3 S8 1990

Standley Lake Cities' responses to public comments for the Standley Lake diversion project draft environmental assessment Call No.: GB1798.9 .C6 S75 1994

RAC (Radiological Assessments Corp.) reports (preliminary and final reports)

Ecological reports, habitat studies, plant and animal inventories

COMRAD/MERCO reports (air monitoring reports)

RFPs (reports on various projects and tests conducted at Rocky Flats—although the Reading Room did not contain the complete set of these reports, it did have almost 350 out of 5500 reports)

Public scoping meetings videos

Occurrence Reports (reports of various accidents and incidents by dept.)

Draft Environmental Impact Statements



**Westminster Campus**  
3645 West 112th Avenue  
Westminster, CO 80031-2  
303-466-8811  
Fax: 303-466-1623  
<http://frctrange.rightclick>

Unclassified versions of the investigations of 1957 and 1969 fires

Plant newspapers [Horizon, En(d)vision, and others]

Rocky Flats dictionaries and thesaurus of subject descriptors

Chemical inventories

Newspaper clipping files (news stories pertaining to Rocky Flats from Jan. 1989 through the Fall of 2007)

I did a sampling of both OSTI (DOE Information Bridge) and the finding aid for the Rocky Flats CERCLA Administrative Record, and didn't find any of the documents I searched for available at either location.

The College Hill Library still has catalog records for these documents on its online catalog. They have not yet been purged. However, the IT staff says that these records could be copied or burned to a CD-ROM.

Not all of these documents are likely to contain personal information. I think the list of potential documents containing personal information is rather small, and could be narrowed down—these would be primarily legal and medical files. One that I can think of immediately which contains such information is Various documents provided by EG &G Legal Records Management as part of the Reading Room's holdings. Call number: HD9744 .N83 L443 1994

The City and County of Broomfield and the City of Westminster often voiced concerns that if the Reading Room closed, the documents it contained would no longer be publicly available, and the DOE might permanently dispose of them. It seems their fears were well founded. Since I worked closely with these documents for several years, and know from personal experience that they are useful to local citizens and researchers, I would hate to see them disposed of rather than archived.

Sincerely,

Gary Morell  
(303) 404-5133