

To: Rocky Flats Stewardship Council Board of Directors and CDPHE
From: Jon Lipsky, subject matter expert and local stakeholder
Date: February 5, 2018
Subject: CDPHE briefing – “Myths and Misunderstandings”

The USDOE – Soil Water Database (SWD) – contains environmental data from 1986. The 2006 USDOE - Comprehensive Risk Assessment (CRA) Executive Summary – states “only data collected on or after June 28, 1991 were used in the CRA, specifically June 1991 to September 1, 2005.” (p. 4). Rocky Flats related environmental sampling occurred well before 1991¹.

The denuded samples prior to June 28, 1991 comprised significant regulatory, federal-prosecutive criminal and nuclear worker claims decisions; why were these dated (prior to June 28, 1991) samples not considered for the Comprehensive Risk Analysis (for human health and the environment)?

Why is it important for CDPHE, USDOE and USEPA to tout the number of environmental samples when not all available data for environmental samples were considered for the CRA?

How many samples were collected between June 28, 1991 to September 1, 2005?

The Rocky Flats Site, Federal Facility Agreement and Consent Order (a/k/a RFLMA of 2007), that CDPHE and USEPA is currently enforcing against USDOE, includes Surface Water Standards (Table 1 at Att. 2, p. 10). Surface Water Standards include Radium 226/228, Strontium 89/90, and Tritium.

What is the rationale to not require the above listed analytes (Radium, Strontium and Tritium) as sampling criteria for the USDOE Rocky Flats Water Monitoring Locations and Sampling Criteria (Table 2 at Att. 2, pages 16-19)?

Respectfully submitted,



Jon Lipsky

¹ Martell et al (1969); Krey-Hardy (1970); Hardy (1975); Nichols (1974-1976); 1984 NPL candidacy determinations; Rocky Flats Comprehensive Environmental Assessment and Response Program (CEARP) study (1986); the Rocky Flats hazardous waste (RCRA Part B) permitting requirements (1987); and, the federal criminal search warrant (1989) were all discounted in favor of the SCM and its subjective science.