

**From:** [anne.fenerty](#)  
**To:** [David Abelson](#)  
**Subject:** Rocky Flats CAD/ROD modification  
**Date:** Saturday, August 06, 2011 7:53:03 PM

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David:

These are my comments on the CAD/ROD modification. Please attach to the Stewardship Council packet....Anne Fenerty

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**From:** anne.fenerty [mailto:[anne@fenerty.com](mailto:anne@fenerty.com)]  
**Sent:** Tuesday, August 02, 2011 10:22 PM  
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**Subject:** Rocky Flats CAD/ROD modification

- August 2, 2011

Rocky Flats Site Proposed Plan Comments  
Scott Surovchak, Legacy Management  
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Westminster, Co., 80021

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Environmental Protection Agency, Region 8  
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From: Anne Fenerty  
2805 Stanford Avenue  
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Subject: Rocky Flats CAD/ROD modification

As a member of the RF Citizens Advisory Board(CAB) I have been involved in discussions previous to the CAD/ROD. I represented the Sierra Club and the Boulder League of Women Voters on the group selecting the technical experts who were asked by DOE to evaluate plans for the remediation of the site. These independent scientists and engineers all had concerns about the plan and the fact that the generally accepted method for radioactive site remediation method was

not used by the DOE contractor. My comments and their references were published in Physics Today, September 2007.

Weakening institutional controls on this site is unacceptable because the danger the great deal of remaining soil contamination poses to the public.

Please note the concern which the Interior Department's Inspector General expressed in a recent memorandum. Digging at RF where a great number of very contaminated buildings have been buried is not an acceptable risk for the public. This pertains to both: Plans for a toll road at the eastern perimeter -- according to CDPHE the most polluted part of RF-- and to a plan to plow under invasive vegetation.

Finally, having been trained as an inorganic chemist, (MS, Michigan State) I am rather surprized that Scott Surovchak would characterize plutonium a "just a metal" at the July 20 meeting. Many of the elements of the Periodic Table such as copper, aluminum etc. are metals. But plutonium and beryllium, both contaminants at RF, are also known carcinogens. One microgram, one millionth of a gram of plutonium is lethal. At RF plutonium dioxide is present in finelly divided particles, possibly absorbed by plants, carried by colloidal matter in water and as windblown particles. All of this has been found and published at radioactive sites.

DOE, CDPHE and EPA owes to the public that independent scientists, knowledgeable in health physics evaluate any changes are made at RF.