

ROCKY FLATS STEWARDSHIP COUNCIL

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Jefferson County ~ Boulder County ~ City and County of Broomfield ~ City of Arvada ~ City of Boulder
City of Golden ~ City of Northglenn ~ City of Thornton ~ City of Westminster ~ Town of Superior
League of Women Voters ~ Rocky Flats Cold War Museum ~ Rocky Flats Homesteaders
Kim Griffiths

February 4, 2019

Mr. Scott Surovchak
Manager, Rocky Flats Site
United States Department of Energy
11035 Dover Street, Suite 600
Westminster, CO 80021

Dear Mr. Surovchak,

As the Department of Energy-designated Local Stakeholder Organization for Rocky Flats, the Board of Directors of the Rocky Flats Stewardship Council is forwarding to you concerns that have been brought forth by Jefferson County, Boulder County, City and County of Broomfield, Arvada, Boulder, Golden, Northglenn, Thornton, Westminster, Superior, League of Women Voters, Rocky Flats Cold War Museum, Rocky Flats Homesteaders, and Kim Griffiths.

Regards,

A handwritten signature in blue ink that reads "Joyce Downing" with a small mark below it that appears to be "(DA)".

Joyce Downing
Chair

Cc: Lindsay Masters, CDPHE
Vera Moritz, EPA

To: Department of Energy, Office of Legacy Management, Rocky Flats (via the Rocky Flats Stewardship Council)

Submitted By: Jefferson County, Boulder County, City and County of Broomfield, Arvada, Boulder, Golden, Northglenn, Thornton, Westminster, Superior, League of Women Voters, Rocky Flats Cold War Museum, Rocky Flats Homesteaders, and Kim Griffiths

Local governments and community organizations have closely tracked management activities at the Original Landfill (OLF), an old waste dump situated on a steep hillside above Woman Creek. Public concern with the OLF has increased in recent years as a result of slumping. The majority of Rocky Flats Stewardship Council meetings include some discussion by the Department of Energy (DOE) and/or the Colorado Department of Public Health and Environment (CDPHE) of the OLF and ongoing steps to evaluate subsurface hydrology and the source of slumping, and to develop remedial actions.

Since the completion of cleanup activities in October 2005, DOE's understanding of Rocky Flats and the long-term effectiveness of the cleanup remedies has increased—and based on that increased understating, DOE, working with CDPHE and the Environmental Protection Agency (EPA), has made a number of important changes to the monitoring program. That ability to adapt has proven invaluable in managing a site that is not static.

We commend DOE for the focus and attention it has placed in expanding its understanding of the subsurface hydrology and the unintended consequences of leaving in place at the OLF subsurface drains and associated features. All of us, DOE included, now know that groundwater movement through the OLF is more complex than previously thought, with approximately 500,000 gallons of water moving through the subsurface storm drains and associated features toward the OLF over a three-month period. That pathway changes our collective understanding of water movement and potential contaminant migration through the OLF.

Accordingly, we request that DOE collect water quality data at or around the downstream terminus of the subsurface storm drains and associated features, prior to pumping and discharging the water to a downstream location. DOE currently collects downstream water at two surface water monitoring locations, GS-59 and WOMPOC. These two locations are critical in identifying the potential impact of the OLF on water quality. However, with the change in DOE's understanding of the subsurface hydrology and groundwater movement upstream of the OLF, additional data is needed to confirm the nature and concentrations of contaminants that might be moving via the newly discovered subsurface pathway. This request for additional data is consistent with the RFLMA water quality testing protocols, which are, by design, complementary and redundant.

Additionally, we are concerned that DOE has taken boreholes at the OLF but has not conducted a chemical analysis on those soils. The decision to not test these soils leaves us believing that there is a general lack of inquisitiveness on DOE's part. DOE has confirmed that it retains those boreholes, making chemical testing possible. We therefore request that DOE conduct chemical analyses on the boreholes and make the results available to the public.

In both cases, if the data from both requests confirm what DOE, CDPHE and EPA currently know, that data is helpful. Likewise, if the data provides new information, it could prove helpful in developing and implementing future management decisions.

We look forward to your written response.