

Rocky Flats Citizens Advisory Board Recommendation 98-9

to the U.S. Department of Energy

Comments on *Accelerating Cleanup: Paths to Closure*

Approved June 4, 1998

June 4, 1998

Ms. Jessie Roberson
Manager, DOE-RFFO
P.O. Box 928
Golden, CO 80402-0928

Dear Jessie:

In this letter, the Rocky Flats Citizens Advisory Board wishes to transmit the final in its series of recommendations and comments regarding the environmental monitoring program at Rocky Flats. These recommendations and comments are a follow-up to the independent assessment of the environmental monitoring program CAB undertook last year. Already you have received a set of comments and recommendations prepared by our contractor, Parker-Hall, Inc., with respect to the Integrated Monitoring Program document. Also, you have received a CAB recommendation asking for DOE participation in a collaborative effort with CAB to develop better means of communicating environmental monitoring data and information. Members of CAB have met with representatives from Kaiser-Hill, DOE and CDPHE to discuss these issues. Resulting from these conversations, CAB would like to offer now this third set of comments and recommendations concerning environmental monitoring at Rocky Flats.

1. CAB appreciates the opportunity to participate in meetings of the Integrated Monitoring Program (IMP). These meetings have demonstrated that the site, the regulators and community representatives share a common desire to see improved integration of the various environmental monitoring programs. The formation of subgroups within the IMP which meet to discuss media-specific issues, and then the periodic bringing together of the subgroups for integrated conversations appears to be a good approach. Such integration was one of the major recommendations provided by CAB's independent contractor.
2. An additional positive feature of the IMP planning is the establishment of the Data

Presentation Working Subgroup. This subgroup should allow for discussions and planning for ways to improve the communication of environmental monitoring data and information. Also appreciated is the commitment by the Subgroup to meet in the evenings and at locations more accessible to members of the public who wish to participate. CAB looks forward to fruitful developments from this subgroup.

3. An area of concern for CAB is the need at the site to realize the dynamic nature of the environmental monitoring program. With the advent of the IMP, the site has committed to an annual review process for the environmental monitoring programs. Such review will allow the site to incorporate new data and findings to make changes in the programs as necessary. Still, CAB does have concerns about assumptions made at the site regarding certain monitoring programs that may preclude the continual collection and analysis of data.

Specifically, CAB would like to note the following programs:

- Groundwater: The site cannot assume that it has a complete understanding of the hydrogeology at Rocky Flats. Continued assumptions that there is limited contact between the upper and lower hydrostratigraphic units means that the site will continue to underestimate the potential that at some future time contaminants could find a pathway to the lower aquifer. Recently, DOE acknowledged that its groundwater assumptions at the Hanford Reservation were in error and that indeed contamination was moving closer to and jeopardizing the Columbia River. The citizens near Rocky Flats do not want similar assumptions to jeopardize the lower aquifers underlying Rocky Flats. Therefore, **CAB recommends that the site continue to evaluate and refine its understanding of the groundwater systems at and near Rocky Flats. CAB also would like to see three dimensional models developed for the underlying geology and contaminant plumes at the site.**
 - Ecology: The site assumes that it has a clear understanding of the contaminant uptake for both plants and animals at Rocky Flats. CAB challenges this assumption and asks that the site re-evaluate its position. As the site progresses in the cleanup of the contaminated soil areas and as the decontamination and demolition of buildings and facilities progresses, **CAB recommends that data continue to be collected to better understand the uptake of contaminants by and harm to the biotic communities.**
4. With the closure of the on-site laboratories to perform sample analysis, excessive delays in obtaining environmental monitoring data now result. These delays are not acceptable, especially in circumstances involving releases of water from the onsite ponds. **CAB recommends that the site explore all avenues possible, including the reinstallation of appropriate laboratory facilities on-site to handle environmental monitoring samples**

in a timely manner. CAB further requests that DOE work with the stakeholders in defining what is meant by "a timely manner."

5. CAB is concerned with the possibility of contaminants reaching and then being released from the site sewage treatment plant. To attain utmost certainty that water releases from this facility will be contaminant free and to protect the plant operators, **CAB recommends that a comprehensive monitoring program be established for both influent and effluent streams at the sewage treatment plant.**
6. One of the major criticisms provided by CAB's consultant was that a routine soil and sediment monitoring program was not in effect at Rocky Flats. Because of lingering questions surrounding the mobility of contaminants and soils at Rocky Flats, **CAB recommends that the site establish a routine monitoring program for soils and sediments. To gain an additional perspective on this issue, CAB further recommends that this topic be included in the scope of work for the Actinide Migration Studies.**
7. CAB is still uncertain about the site's program for project specific monitoring. As various environmental restoration and D&D projects get underway, it is important that specific monitoring programs be developed to augment the existing routine programs. CAB's confidence in the site's project specific monitoring programs has diminished following problems with the Trench T3/T4, Mound and RCRA Tanks remediation projects. **To gain more confidence in these programs, CAB has two recommendations. First, CAB recommends that the site consult with and advise the entities responsible for emergency planning regarding necessary monitoring for all cleanup and D&D projects. Second, CAB wishes to add to the list of Critical Reporting Elements contained in its Recommendation 96-13, "Cleanup Principles and Critical Reporting Elements," dated September 6, 1996. This new item would be a "description of the environmental monitoring systems used during environmental restoration and D&D projects." CAB has requested that these Critical Reporting Elements be developed and shared with the public for all cleanup projects at the site.**
8. When the final project analysis was completed by our contractor, CAB developed a summary of all the comments and recommendations made by the contractor. These comments and recommendations were forwarded to the site and have been the basis of the conversation between CAB and the site environmental monitoring program managers. CAB understands that these comments and recommendations have been split among the various subgroups of the IMP for discussion and resolution. **CAB requests that at the end of these discussions, a written summary be prepared that outlines those recommendations and comments that have been incorporated into the monitoring programs, as well as justifications for those which are not.**

In conclusion, CAB wishes to commend Bob Nininger with Kaiser-Hill who has served as the

point of contact during CAB's assessment of the environmental monitoring programs. Bob and the other environmental monitoring program managers have been quite proactive in responding to the many comments and recommendations provided by the CAB's contractor. CAB hopes that this spirit of cooperation continues as we begin more extensive conversations concerning these matters.

We look forward to your earliest response.

Sincerely,

Tom Marshall
Chair

The Rocky Flats Citizens Advisory Board is a community advisory group that reviews and provides recommendations on cleanup plans for Rocky Flats, a former nuclear weapons plant outside of Denver, Colorado.

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