



## Rocky Flats Citizens Advisory Board Recommendation 2002-2

### Comments on the Draft Environmental Restoration RFCA Standard Operating Protocol for Routine Soil Remediation (ER RSOP) Notification #02-09, IHSS 112 - 903 Pad

Approved September 5, 2002

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The Rocky Flats Citizens Advisory Board (RFCAB) has the following concerns and comments regarding ER RSOP Notification #02-09 for the 903 Pad Remediation.

#### 1. Remedial Action Objectives:

**Concern:** Under DOE's end state proposal, all surface soil contaminated with plutonium above a level of 50 pCi/g would be remediated. Yet, the 903 Pad ER RSOP Notification states that the goal of the project will be remediation to the 1996 Tier I action level of 651 pCi/g. Borehole sampling results from previous investigations indicate there may be areas of the pad that would not be subject to remediation if the cleanup goal is 651 pCi/g.

**Comment:** It should be explicitly stated in this notification that the cleanup goal of the 903 Pad Project shall be consistent with DOE's end state proposal.

#### 2. Postponing the decision on Volatile Organic Compounds (VOCs):

**Concern:** This notification does not address VOCs as a contaminant of concern.

**Comment:** RFCAB is concerned that by deferring a decision on VOCs, DOE is at risk of leaving behind soil contaminated with VOCs that will have to be remediated later on. Due to the cost of mobilizing a remediation team, this seems to be a highly inefficient approach. DOE should analyze the problem up front and know what it plans to do with the VOCs before the radiological remediation commences. If there is a highly concentrated source of VOCs underlying the 903 Pad, RFCAB recommends that it be removed or treated in order to reduce the long-term operations, maintenance and monitoring costs associated with the Mound/East Trenches Passive Groundwater Treatment Systems.

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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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