



**Rocky Flats Citizens Advisory Board
Recommendation 2004-5**

Comments on the Draft Pond and Land Configuration Environmental Assessment

Approved June 3, 2004

Letter to:

Mr. Frazer Lockhart
U.S. Dept. of Energy
Rocky Flats Project Office
10808 Highway 93, Unit A
Golden, CO 80403

Dear Mr. Lockhart:

The Rocky Flats Citizens Advisory Board appreciates the opportunity to review and comment upon the draft of the Environmental Assessment for the Pond and Land Configuration (EA), dated April 2004. We value the partnership we have developed over the years with the Department of Energy and hope our comments and recommendations will create opportunities for future dialogue.

I. The Board thinks the EA is premature. We believe the remediation of Ponds B-1, B-2, and B-3 must be accomplished before decisions on reconfiguration of the ponds are made. Therefore, the document addressing the remediation of the ponds should have been released prior to the EA. We also think the Ponds B-1, B-2, and B-3 remediation plan should be released for public comment and not merely published as a notification. The Board also believes the EA should have included plans for all of the series ponds, including Ponds C-1 and C-2 in the Woman Creek drainage.

A. The Board recommends a final decision on the EA be delayed until the remediation plan is published. We also recommend the remediation plan for the sediments in Ponds B-1, B-2, and B-3 be released for public comment rather than published as an Environmental Remediation Rocky Flats Cleanup Agreement Standard Operating Protocol (ER RSOP) notification.

B. We recommend that in the EA the Site include a discussion of its findings and actions for Ponds C-1 and C-2 in the Woman Creek drainage. If the Site decides not to include actions for Ponds C-1 and C-2 in the EA, we would request the Site provide a justification for not including this pond series.

C. We thank the Site for maps of data on radionuclide contamination in the sediments of the ponds and the South Interceptor Ditch. The Board makes an additional request for data on chemicals and volatile organic compounds in the sediments in all of the series ponds, including Ponds C-1 and C-2.

II. The Board is concerned with wetlands in the pond system. Because the amount of water to the pond system will be sharply reduced, wetlands may not be sustainable. Water levels and soil types should determine which plant communities and ecosystems are sustainable in the reduced-water environment that is envisioned in the EA. It may be less labor intensive and less costly to first determine the appropriate and sustainable ecosystem and plant types that will be self-sustaining. The Site may save money and time in the end if it hired consultants to determine what types of plants would be sustainable in that area. Also, because plant communities can take years to become established, we are concerned that the EA does not

state who will monitor the vegetation post-closure and the actions that would be taken if the plant communities fail to establish themselves in the area.

A. Therefore, the Board recommends the Site hire an expert to study the revegetation of the pond system with an eye towards establishing an ecosystem and plant communities that would be appropriate for a reduced water environment. It may not be appropriate to attempt to re-establish a wetlands environment in those areas because the amount of water to the pond system will be sharply reduced.

B. The Board requests the Site include in the EA its plans for post-closure monitoring of the vegetation and to delineate the entity or person who will be responsible for the monitoring. We also recommend the Site include actions it intends to take if the revegetation of the pond system is not successful.

III. With respect to the actions to be taken, the Board has several comments on the pond system. In particular, the Board believes a more natural pond system should be established as an end result. A more natural flow-through system would be less disruptive to the environment.

A. The EA discusses whether to maintain the diversion of water around the upper B-series ponds. Water will be diverted while vegetation is being established. After the vegetation is well established in the modified drainages, the by-pass could be reconfigured to divert runoff directly through the modified interior ponds. How will this be determined and who will decide?

B. The EA states "The Pond-A-2 average pool elevation was assumed to be lowered in the proposed action by approximately 6 feet." We request the Site provide justification for this assumption.

C. The Board believes a long-term strategy for pond management should include natural flow through the terminal ponds. Currently, water is held in the terminal ponds and released in batches. The Board recommends that the Site work with local governments to determine the conditions for natural flow through the drainages and the Site develop a long-term strategy that includes (1) modifying the current pond system to a more passive and natural flow system that continues to be protective of human health and the environment; (2) accommodating and managing the impacts of anticipated reduced flow, and (3) protecting surface water and the ecology.

IV. The Board has several comments and recommendations on the proposed Land Configuration plan.

A. The document states drainage ditches next to roads would not be regraded. This appears to be in conflict with the Land Configuration Map, which would require extensive regrading. We request the Site provide a justification for the statement in the EA that the drainage ditches next to roads would not be regraded.

B. The document states that asphalt will be removed from the major access roads to the site and the north perimeter road. However, it is our understanding that asphalt will be removed from all roads. The board requests the statement in the document be clarified or changed to reflect that all asphalt will be removed.

C. The EA states some culverts will be removed and others will remain. The Board requests the site provide a justification and the criteria as to why some culverts will remain and some not.

D. The EA states that culverts that will remain will be plugged at each end. The Board's concern is that there will be slumping in the middle of the culverts with the consequent subsidence of the landscape. The Board requests the Site discuss this in the EA and discuss removing all the culverts or implementing other methods of closing the culverts so that subsidence will not occur.

E. The Industrial Area was built on a pediment surface. The Board is concerned that modifying that surface could lead to erosion and

potentially expose subsurface contamination. The Board generally endorses the regrading plan in the EA in that it attempts to return the natural drainage pattern. We request the Site continue to study the regrading in order to minimize further erosion.

F. Past studies have shown that surface runoff on slopes contributes to surface water contamination downstream. The Board recommends that the regrading plan concept and its implementation take special care to prevent any residual plutonium contamination from being eroded into surface water - either from the planned final configuration slopes or potential future slopes created by erosion.

G. The Board is concerned that if water is allowed to percolate through buildings with residual contamination, over time it may liberate the contamination and allow it to move into groundwater. The Board recommends that the land configuration plan encourage runoff to flow around any building sites, such as those now occupied by Buildings 371 and 771, that may contain residual contamination. The Board also recommends that special care be taken to minimize water flow through any remaining underground structures and pipes.

V. Miscellaneous issues.

A. The EA states "Fish can be found in the intermittent streams and most ponds at the Site. Common species include fathead minnows (*Pimephales promelas*), creek chubs (*Semotilus atromaculatus*), and an occasional small-mouth (*Micropterus dolomieu*) and large-mouth (*M. salmoides*) bass." Given that the fish are in the streams and ponds and the sediments in the ponds may be contaminated with radionuclides, we recommend that before the Site drains the ponds, it test a representative sample of the fish for radionuclide contamination. If the fish are contaminated, they need to be disposed of properly and not allowed to contaminate the food chain. The Board requests results from any analyses for radionuclide or chemical contamination in the fish.

B. The EA states some of the material in the dams may be used on site or shipped offsite. The Board requests the Site provide the criteria and justification for deciding whether the dam material is used on site or is shipped off-site.

C. The Board recommends the Site study how the decrease in surface water quantity will affect surface water quality.

D. There is a 100-year flood plain map on Page 8 of the document. The Board requests the Site provide the date of the map.

E. Lastly, in several places the document lacks clarity and should be edited. While this may seem a small point, there are places in the document where it is not clear what the Site intends to do. There are also many places in the document where there is no justification provided for actions that are planned to be taken. The Board, therefore, requests the document be edited with attention paid to clarity of ideas, justification of actions, spelling, and grammar.

Again, we thank the Department of Energy for the opportunity to comment on the draft Environmental Assessment. So that we are made aware of the resolution of our comments and recommendations, we ask that the site provide its response directly to us.

Sincerely,

Victor Holm
Chair

cc: Mr. Steve Gunderson, Colorado Department of Public Health and Environment
Mr. Mark Aguilar, U.S. Environmental Protection Agency
Mr. Rich Schassburger, U.S. Department of Energy
Mr. Dean Rundle, U.S. Fish and Wildlife Service

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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