

# ROCKY FLATS STEWARDSHIP COUNCIL

P.O. Box 17670  
Boulder, CO 80308-0670  
www.rockyflatssc.org

(303) 412-1200  
(303) 412-1211 (f)

Jefferson County -- Boulder County -- City and County of Broomfield -- City of Arvada -- City of Boulder  
City of Golden -- City of Northglenn -- City of Westminster -- Town of Superior  
League of Women Voters -- Rocky Flats Cold War Museum -- Rocky Flats Homesteaders  
Karen Imbierowicz

November 8, 2008

Mr. Paul Frohardt  
Colorado Water Quality Control Commission  
4300 Cheery Creek Dive South  
Denver, CO 80246-1530

Dear Mr. Frohardt,

As the Department of Energy-designated Local Stakeholder Organization for Rocky Flats, we are writing in support of the cities of Broomfield, Northglenn, Thornton, and Westminster's concerns with the Department of Energy's (DOE) petition to change the site-specific standards for uranium at Rocky Flats. The Rocky Flats Stewardship Council formed for the express purpose of ensuring long-term local government and community oversight of Rocky Flats. Collectively, we represent approximately 900,000 people who live within close proximity of Rocky Flats. Our members include communities downstream of Rocky Flats whose water flows through the site.

While the cleanup was a success there are numerous systems and cleanup remedies that continue to bear watching. DOE's decision to seek alignment of the site uranium standard with the state of Colorado's standard raises a number of issues that warrant careful examination. The current site standard must be viewed not simply through the lens of risk, but as an indicator of the effectiveness and protectiveness of the cleanup remedies.

Maintaining a site-specific standard that is more conservative than the regulatory standard is not unusual at Rocky Flats. For instance, the standard for plutonium in water at the Rocky Flats site boundary is 100 times more protective than the Environmental Protection Agency's (EPA) standard; it is likewise more stringent than what is necessary to protect the future user at the site. DOE, CDPHE and EPA, with the strong backing of local governments and community members, adopted this more stringent plutonium standard because it was a means to ensure the remedies would continue to meet the overall intent of the \$7 billion cleanup. Risk was one of the factors the parties considered, but because of the unique nature of Rocky Flats a more conservative

number was adopted. In this way, maintaining the current Rocky Flats site-specific uranium standard tracks the plutonium standard.

We've known for some time that because of the high natural background radiation in the area of Rocky Flats that the current uranium standard of 10 pCi/L could be hard to meet. The cleanup was designed to ensure DOE aggressively tackled clean up of the man-made uranium found at the Rocky Flats. While the state's determination of acceptable risks changed over time (as reflected in the current uranium standard) the need for a more protective standard at Rocky Flats – namely, a measure of the effectiveness of the remedy – has not.

While the bulk of the remedies at Rocky Flats are meeting expectations, it is too early to evaluate whether the remedies will be protective over the long-term. The cleanup was, importantly, only certified by the EPA less than three years ago. Yet, because of the ongoing groundwater treatment, critical areas of the site remain on the CERCLA National Priorities List.

Until we have a better sense of the long-term effectiveness of the remedies, it remains within the state's obligation to ensure DOE aggressively pursues cleanup of the groundwater. One way to maintain this critical focus is by maintaining the current site-specific uranium standard.

Thank you for considering our thoughts on this matter.



Lorraine Anderson  
Chairman

Cc: Scott Surovchak, DOE  
Carl Spreng, CDPHE  
Vera Moritz, EPA