



# City of Broomfield

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MAY 19 1992

May 18, 1992

Beth Brainard  
Public Affairs Officer  
U.S. Department of Energy  
Rocky Flats Office  
P O Box 928  
Golden, CO 80402-0928

Re: Proposed Final Subsurface Interim Measure/Interim Remedial Action Plan/Environmental Assessment and Decision Document--Operable Unit 2

Dear Beth

The City of Broomfield would like to thank the U.S. Department of Energy Rocky Flats Office for this opportunity to comment on the Proposed Final Subsurface Interim Measure/Interim Remedial Action Plan/Environmental Assessment (IM/IRAP/EA) and Decision Document--Operable Unit 2 (OU2)--Volumes 1 & 2. We commend DOE/EG&G's efforts to meet this and all of the requirements under the Interagency Agreement.

Since the migration of contaminants from OU2 is not an immediate threat to the public, Broomfield supports the idea of performing a subsurface IM/IRAP/EA to gather information on treatment options that will aid in the design of the final remedy. We understand, as explained in Section 1 (pages 1-2), that there are great uncertainties associated with subsurface remediation. The small-scale pilot study test plans are a sensible approach.

The City has two major concerns with the document. The first is the issue of Applicable or Relevant and Appropriate Requirements (ARAR's) outlined in Section 3. The City of Broomfield fully supports the Colorado Department of Health's position on ARAR's as stated in Gary Baughman's March 12, 1992, letter to Frazer Lockhart. The City strongly urges DOE to work diligently with CDH to resolve this issue.

The second major concern is the proposed use of the South Walnut Creek Treatment System for treatment of the groundwater pumped from the three areas within OU2 and the condensate from the vapor extraction process. The South Walnut Creek Treatment System hasn't been in place long enough to establish its effectiveness in treating radionuclides. We have not seen any data to date that indicates that the radionuclide treatment is working. Any upset condition with that treatment facility would allow the contaminated

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Beth Brainard  
May 18, 1992

Page 2

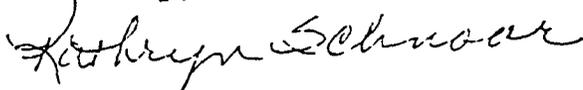
groundwater to flow directly into Walnut Creek. The City feels the treatment system at the terminal ponds on Walnut Creek is adequate to treat surface water with low-level radionuclides as it was intended, but not adequately equipped to treat levels of radionuclides that may come from under the 903 pad. There is potential for contamination to reach Great Western Reservoir or down stream users.

The document states several times that the chemistry of the groundwater in that area is uncertain. There are separate sections (4.3.2.2, 4.4.2.2, and 4.5.2.2) written to deal with "deviations from expected conditions due to incorrect assumptions with respect to site-specific hydrogeology and nature of contamination based on limited site characterization data" (page 4-41). With your well-documented uncertainties about the quality of the groundwater and the relatively small volumes of groundwater generated, it would be prudent to use the Building 231 GAC Adsorption System and the Building 374 Low-Level Wastewater Treatment System. These established systems, as indicated on page 4-78, are well-suited for removal of VOC's, radionuclides and metals that may be present in the Subsurface IM/IRA groundwater and condensate. The document states that there is extra processing capacity at both facilities (page 4-78). Broomfield strongly urges DOE to pursue this as the preferred treatment option.

Broomfield has to continue to protect the Walnut Creek drainage from any additional contaminant loading until the Option B project is in place. It is important that the Option B project be finished in its entirety as soon as possible. The estimated total cost is approximately \$73 million. Twenty million dollars has been obligated so far in FY91 and FY92. At present, another \$40 million is expected in FY93, and the final \$13 million in FY94. The City of Broomfield urges the Department to consider accelerating the funding so that full protection can be in place more quickly. This would help avoid concerns of several down stream water users that the option B project could be only partially completed for many years to come.

Thank you again for providing an opportunity to comment on this document. Broomfield looks forward to the publication of a final document that reflects the comments raised herein. If you have any questions, please call me at 469-3301.

Sincerely,



Kathryn Schnoor  
Environmental Services Administrator