

Rocky Flats Cleanup Commission

11/9/89 DOE PUBLIC COMMENT
HEARING

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Comments on the proposed 881 Hillside IRA

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The lack of upgradient wells indicates deficiency regarding "background" levels of contaminants versus those found in alluvial measurements and groundwater wells in the area known as the 881 Hillside

There is serious deficiency regarding lack of chemical and radionuclide direct soil analysis both on and offsite for the determination of spread of contaminants originating from the Rocky Flats Plant.

Sources of contaminants are not identified, so that an eventual permanent solution could be initiated. As an interim measure, the peroxide/UV application for destruction of VOC's is controversial, and has not been "proven" for remediations of this size. The benefit of this technology is questionable in terms of the volume it is capable of handling.

In comparing the site diagrams of the Proposed Interim Measures/IRA Plan and Decision Document for the 881 Hillside area, the 903 Pad, Mound, and East Trenches Remedial Investigation, and the Rocky Flats Plant site map in the Assessment of Environmental Conditions at the Rocky Flats Plant report, it appears that the area blocked out for 881 remediation encroaches in part on the 903 Pad area. If this is so, how will the public be protected during the remediation process from the radionuclides liberated from this process? Resuspension is a problem.

Migration from the 903 area to the 881 area is not addressed as a possible source of contaminants. The 886 building is adjacent to the 881 area as well. Where do the discharges from this building drain to? A chart detailing groundwater migration and the plant piping system and drains would assist in determining sources and potential toxicity.

No mention is made regarding protection of the community during remediation activities. Historically, monitoring of this area has shown elevated readings of radionuclide activity during these types of activities (eg barrel removal). Please see report # RFP-3914, Dust Transport-Wind and Mechanical Resuspension. We would suggest a containment structure such as temporary buildings and/or domes be used to contain contaminants that are disturbed during cleanup phases of note such as drilling, earthmoving and the like.

There is a lack of dispersion modeling for migration of plumes of contamination that would also assist in the identification of sourcepoints of many of the contaminants in question.

Respectfully Submitted,

Paula Elofson-Gardine

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ADMIN RECORD

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