City of Broomfield Comments
Operable Unit 3 Remedial Investigation and Proposed Plan
October 11, 1996

- In light of DOE's use of conservative health risk scenarios and the risk associated with draining and dredging of the reservoir, Broomfield believes that leaving the sediments untouched in the short-term is consistent with its short-term future use of the reservoir as a water reuse facility

- Broomfield is not satisfied that leaving residual plutonium in the sediment, particularly the shoreline sediment, is an appropriate long-term solution Regular review of sediment contamination levels and remediation alternatives should be a condition of a no-action alternative

- Broomfield believes that additional feasibility research into alternatives to "no Action" should be conducted. For instance, are there cost effective ways to remove "hot spots" in the bottom of the reservoir, on the shoreline, and on the hillside? In the absence of a formal feasibility study under CERCLA, DOE should consider the future review of plutonium health risk and the prospects of using innovative technology to remove even residual quantities of plutonium - particularly along the Great Western Shoreline. What activities is DOE undertaking to locate innovative soil washing techniques?

- Future cleanup activities upstream could substantially alter the long-term prospect of plutonium loading in the Walnut Creek Drainage and the reservoir DOE should conduct additional modeling and documentation of the prospect for future loading Ongoing studies regarding plutonium mobility and transport must be evaluated to document the likelihood of mass loading on an annual basis Additional analysis of the plutonium solubility will also impact sediment loading issues?

- Recent alterations in DOE's process water management program - particularly the Interceptor Trench waters - have substantially changed the assumptions made in the RI regarding releases into Great Western. DOE should reassess its assumptions regarding downstream releases in light of new budget priorities and the release of the Ten Year Plan

- As DOE undertakes key CERCLA/RCRA decision-making processes, the potential impacts to the Walnut Creek Drainage and Great Western remain unclear DOE should document the specific future decision-making points where it will re-evaluate the wisdom of a "no-action' alternative For instance, will the final CAD/ROD for the entire site include off-site OU's? What is the process of a five-year review anticipated under CERCLA? What is the impact of EPA's future promulgation of a soil radiation standard?

ADMIN RECORD

- DOE should demonstrate that existing levels of residual plutonium or potential future releases into the soil and sediments of the reservoir do not jeopardize the value and usefulness of this important City asset

- How will a "no action" level impact the 1985 lawsuit settlement between landowners and DOE, and the third party beneficiary agreement including the City, regarding soils cleanup? The City is not convinced that the proposed action meets the spirit and intent of the 1985 settlement.