



C I T Y o f W E S T M I N S T E R

October 11, 1996

Public Works and Utilities

4800 West 92nd Avenue
Westminster Colorado
80030

303 430 2400
FAX 303 650 1643

U S Department of Energy
External Affairs Office
P O Box 928
Golden, Colorado 80402-0928

RE Preferred Alternative for Operable Unit 3

To Whom It May Concern

The City of Westminster has reviewed the Proposed Plan for the off-site areas associated with the Rocky Flats Environmental Technology Site known as Operable Unit 3 (OU3). This letter provides Westminster's comments on the preferred alternatives outlined in the plan.

Westminster feels it is premature to come to a final decision and closure on this area. It is our belief that the possibility remains for contamination to move off-site during the cleanup process within the site boundaries. We suggest that this process be held open or allowed to be re-visited at some point in the future, after all cleanup is done. It makes sense to us that cleanup decisions be made starting with the worst areas and then moving outward to ensure that the overall cleanup is most effective.

An important part of the entire cleanup process is establishing the standards by which the decisions are made. The US Environmental Protection Agency (EPA) is in the process of establishing a nationwide soils standard. Since the OU3 areas are entirely separated from the plant site, we would urge the application of the new final standard to the OU3 evaluation process to reinforce to the public that the decisions are appropriate. The final OU3 Record of Decision (ROD) would have to be delayed in order to accommodate this request. An alternative would be to specify in the ROD that there should be a review of the OU3 findings based on the new standard when it is promulgated by EPA.

In regards to Standley Lake, it is our opinion that the sampling of the reservoir was not done adequately to truly characterize the potential effects of the radiological contaminants which have been deposited there. There are still unanswered questions as to the quantity of Plutonium or Uranium constituents which may be released into the water column during periods of oxygen deficiency at the bottom of the reservoir. These periods can occur twice per year in Standley Lake and

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can be quite severe, both in oxygen levels and duration. The reduction of other metals back into the water column from the sediments has already been well documented. Similar problems in Pond C-2 have been discussed in public meetings at various times in the past.

The City of Westminster appreciates the opportunity to review and comment on the proposed plan.

Sincerely,

Tom Settle
Water Quality Coordinator

cc Mayor and City Councillors
Bill Christopher, City Manager
Ron Hellbusch, Public Works and Utilities Director
Mary Harlow, Lab Analyst