

From: [Surovchak, Scott](#)
To: [Kaiser, Linda \(CONTR\)](#); [DiSalvo, Rick \(CONTR\)](#); [Squibb, George \(CONTR\)](#); [Boylan, John \(CONTR\)](#)
Subject: FW: Revisions to the Surface Wter configuration AMP
Date: Monday, May 06, 2013 12:54:19 PM

From: Shirley Garcia [mailto:SGarcia@ci.broomfield.co.us]
Sent: Friday, May 03, 2013 12:34 PM
To: Surovchak, Scott
Cc: David Allen; Cathy Shugarts; Edward Lanyon; Shelley Stanley; Spreng - CDPHE, Carl; Vera Moritz (Moritz.Vera@epamail.epa.gov); David Abelson
Subject: Revisions to the Surface Wter configuration AMP

Scott,

Due to the short timeframe allotted to provide comments to the revised May 2013 Adaptive Management Plan, I am sending some comments to you and will follow-up with a formal letter. The initial date on the approved AMP was June 2011 and per the AMP process we were to reevaluate the plan every two years. The intent of the evaluation was to evaluate data generated by the AMP sampling plan the data per Rocky Flats Legacy Management Agreement (RFLMA) requirements.

Had I not asked to have a technical meeting to discuss the status of the POCs and GS-10 we would have not known of the proposed changes by DOE for GS-10.

In response to new information to relocate GS-10, contradictions in commitments to retaining the POCS at Indiana as a water quality evaluation surface water station, and DOE's commitment to cooperate with the downstream communities, I think there needs to be additional information and discussion prior to finalizing the AMP. There also needs to be more discussion prior to finalizing the Contact Record to relocate GS-10 which serves as a Point-of-Evaluation per RFLMA.

Broomfield has been an active participant with the closure of Rocky Flats and we want to continue a cooperative path to address the proposals and contingencies to protect our communities. It is in our best interest to meet as soon as possible. I understand the Women Creek Authority is requesting a meeting on May 9 to address the AMP revisions. I would like to have a follow-up technical meeting to address the proposals to relocate GS-10, and address our concerns. I ask that we have legible drawings within the Contact Record 2013-01 prior to the meeting.

POCs GS-01 and GS-03 Issues or Concerns:

Removal of the sampling stations in September - This contradicts notes and discussions held these past two years to maintain the stations until the terminal ponds, A-4, B-5 and C-2 are breached
Lack of contingency plan to control contaminated water leaving the site if there is an exceedance at the new POCs WALPOC and WOMPOC or continued reportable conditions at POEs
Continued reportable conditions of plutonium, americium or uranium upstream and no identification of the source. While we understand DOE is trying to identify the source, the ongoing uncertainty about transport mechanisms and plutonium:americium ratios leaves room for caution rather than moving forward with an action that could impact downstream communities.
Inadequate timeframe to evaluate and comment to a redlined AMP. We were given two weeks to respond to the document and the document was not clear as to the status of the Indiana POCs.
Removal of the criteria to maintain the pond levels at the elevation of the inlet to the discharge pipe during flow-through operations. We have been in a dry period and have been able to evaluate dry seasons to some extent, but we have yet to evaluate wet seasons for flow-through and impacts at the Indiana federal site boundary.

GS-10

I will review the data for the POE to prepare for discussion

Broomfield is in the process of determining the regulatory criteria for relocation of this station
Broomfield is in the process of determining the environmental impacts of the proposal, both short-term and long-term.

I look forward to your response and I know that I have the support of the regulatory agencies for a meeting to allow open communication.

Shirley Garcia
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