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CITY of WESTMINSTER

August 15, 1989

Public Works and Utilities

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Mr. Tim Holeman
Policy Analyst
Office of the Governor
127 State Capitol Building
Denver, Colorado 80203

SUBJECT: Local Government Rocky Flats Coordinating
Committee Monitoring Issues

Dear Mr. Holeman:

The Local Government Rocky Flats Coordinating Committee has reviewed the environmental monitoring programs associated with the Department of Energy's (DOE) Rocky Flats facility and requests that certain issues associated with these programs be evaluated by the Governor's Rocky Flats Scientific Panel on Monitoring Systems. This expert Panel was empowered by the Governor to review the adequacy and effectiveness of existing monitoring programs and presently serves as the most capable monitoring oversight group. It is our recommendation that the following questions be reviewed by the Governor's Panel:

1. Air Monitoring

Are the existing DOE and Colorado Department of Health (CDH) high volume air samplers adequate? More technologically, superior equipment may exist.

Are the existing CDH air monitoring stations appropriately located? Ground level only stations are, in some cases, presently located in topographically questionable areas.

Are the existing DOE and CDH air monitors adequate to detect and quantify the emission of minute radioactive aerosols and particles?

It is our committee's impression that volatile organic chemicals and other non-radioactive contaminants should be monitored at all Rocky Flats related monitoring locations, including facility stack emission monitoring. Shouldn't other non-radioactive air released contaminants be monitored at and around Rocky Flats?

It is our committee's impression that State radionuclide air quality standards and regulations are needed to allow the State to install air monitors on facility stacks and to monitor radionuclide emissions from these stacks. Are State

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radionuclide air quality standards required and will standards and regulations allow State monitoring of facility stacks?

2. Surface and Ground Water Monitoring

Are DOE's and CDH's ground water monitoring frequencies adequate?

The committee supports the concept of zero discharges from DOE's wastewater treatment plants. How can we attain zero discharges from this plant?

Is DOE taking steps to address ground water monitoring program deficiencies identified by the U. S. Environmental Protection Agency's Groundwater Task Force and CDH? Many problems have been identified with DOE's ground water monitoring program for the regulated units and high priority areas.

Is there a way to investigate the extent of contamination beneath the asphalt pad at the 903 high priority area? DOE has indicated that the pad is too contaminated and too dangerous to drill into and, therefore, to monitor.

3. Soil Monitoring

It is our committee's impression that CDH's Rocky Flats soil monitoring program is inadequate. Shouldn't other non-radioactive contaminants be monitored? Additionally, what soil monitoring frequencies are sufficient and are the locations chosen for sampling sufficient?

Is monitoring of soil, when it is disturbed through construction or erosion either on- or off-site, adequately addressed in DOE's and CDH's monitoring programs?

The State plutonium in soil guideline of two disintegrations per minute per gram of dry soil assumes soil testing according to CDH protocol. Is it, therefore, appropriate to require that all soil tests, including DOE's to use this CDH sampling protocol?

Are the techniques being used for soil remediation adequate and has this procedure been monitored for its results?

4. Waste Drum Monitoring

Can the State require DOE to implement a waste drum monitoring program to ensure that the contents of waste drums are accurately characterized?



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5. Other

Is CDH's laboratory QA/QC program sufficient and routinely updated and evaluated?

Is CDH's Radiation Control Division's monitoring data computerized to allow data sorting and statistical evaluation?

The committee welcomes this opportunity to provide study recommendations to the Governor's Rocky Flats Scientific Panel. Please feel free to call me at 430-2400 if you have any further questions and comments about these recommendations.

FOR THE LOCAL GOVERNMENT ROCKY FLATS COORDINATING COMMITTEE,

Ronald A. Hellbusch,
Director of Public Works/Utilities

c: Paul Frohardt, CDH
Ron Culbertson, City of Arvada
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