

CORRES CONTROL
INCOMING LTR NO

00979 RF03



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8
999 18TH STREET - SUITE 300
DENVER, CO 80202-2466

RECEIVED

OCT 21 P 2 22
CORRESPONDENCE CONTROL

OCT 20 2003

DUE DATE
ACTION

Ref 8EPR-F

Mr Mark Sattelberg
Senior Contaminant Biologist
US Fish and Wildlife Service
Rocky Mountain Arsenal National Wildlife Refuge
Building 111
Commerce City, CO 80222-1748

Re USFWS Future Activities at Rocky Flats

Dear Mr Sattelberg

This is in response to your letter dated August 20, 2003, in which you asked whether EPA anticipated placing restrictions on activities the US Fish and Wildlife Service (Service) may wish to conduct at the future Rocky Flats National Wildlife Refuge Specifically the Service asked about the following activities prescribed fire, grazing, plowing, and ripping up old roads

Once EPA certifies the remedy to be complete and jurisdiction of property has been transferred to the Service, does EPA foresee any restrictions on the use of prescribed fire? Similarly, does the EPA envision restrictions on ripping up roads?

As you are aware, the widespread contaminants of most concern at Rocky Flats are plutonium and americium Consequently, areas at the site where these contaminants remain at closure would have the most use restrictions In June 2003, CDPHE and EPA approved modifications to the Rocky Flats Cleanup Agreement, including revised contaminant soil action levels EPA expects that at the completion of the remedy no significant contamination will be left in the surface soils at concentrations greater than outlined in the Attachment 5 of the modified agreement For plutonium, the expectation is that surface soils contaminated at concentrations greater than 50 picocuries/gram (pCi/g) will have been removed Surface soils are defined as those less than three feet in depth EPA anticipates there will be restrictions on areas of the Site with residual contamination less than 50 pCi/g but greater than 9 pCi/g - a concentration representing lifetime excess cancer risk of one in 1,000,000 to a wildlife refuge worker This is not to say that prescribed fire or ripping up roads would be precluded in areas with residual contamination in the 9-50 pCi/g range Rather, the Service would need to take extra precautions in those areas to minimize soil disturbances The primary concern is that major soil disturbances could result in elevated levels of contaminants to migrate to surface water

DIST	LTR	ENC
BERARDINI, J. H.	X	
BOGNAR, E. S.	X	
BROOKS, L.	X	
BUTLER, L.	X	
CROCKETT, G. A.		
DECK, C. A.	X	
DEGENHART, K. R.		
DIETER, T. J.		
DIETERLE, S. E.		
FERRERA, D. W.		
GIACOMINI, J. J.		
HIETT, S. B.	X	
ISOM, J. H.		
LINDSAY, D. C.		
LONG, J. W.		
LYLE, J. L.		
MARTINEZ, L. A.	X	
NAGEL, R. E.	X	
NORTH, K.	X	
PARKER, A. M.		
RODGERS, A. D.		
SHELTON, D. C.	X	
SPEARS, M. S.		
TRICE, K. D.		
TUOR, N. R.		
WILLIAMS, J. L.		
ZAHM, C.	X	

COR. CONTROL	X
ADMN. RECORD	X
PATS/130	

Reviewed for Addressee
Corres Control RFP

10/21/03 DRR
Date By

Ref Ltr #

DOE ORDER #
5400.1

1/2



ADMIN RECORD
SW-A-004845

The use of prescribed fire at Rocky Flats is of special interest to citizens and public officials in the surrounding communities. EPA believes that the use of prescribed fire at the site will not pose significant risk to firefighters, Service personnel or the general public. This belief is based upon data gathered during and after the 2000 test burn and for accidental burns at the site, as well as risk assessment work documented in the Task 3 Report (Assessing Risks of Exposure to Plutonium, February 2000) on the effects of prescribed fire at Rocky Flats. However, relatively large areas of Rocky Flats have not been characterized to date. These areas are often referred to as "white spaces." EPA does not believe there is great potential to find contamination in these areas because they are removed from areas of known contamination and are not associated with past practices at the site that resulted in releases of contamination. Nevertheless, unexpected discoveries have occurred at Rocky Flats (e.g., the incinerator near the ash pits), and EPA believes that samples should be collected from white spaces before closure and analyzed prior to the application of prescribed fire in those areas.

Does EPA foresee any restrictions on the consumption of edible tissues from the grazing animals used for weed control at Rocky Flats?

Animal studies to date, and studies conducted by the actinide migration panel, indicate that there is no significant uptake of contaminants by grazing animals at Rocky Flats. Therefore, EPA does not anticipate restrictions on consumption of animals that graze at Rocky Flats. However, overgrazing in the areas in the 9 to 50 pCi/g range could result in water quality issues as discussed above. Therefore, EPA would expect to see measures put in place that would prevent overgrazing.

Do you foresee any restrictions on the plowing of areas in the southeast portion of the site for the purpose of reestablishing native vegetation?

Plowing will in all likelihood be prohibited in any areas of the site where contamination concentrations are greater than 9 pCi/g plutonium.

EPA looks forward to working with the Service in identifying and implementing the necessary restrictions for assuring that residual contamination at the future Rocky Flats National Wildlife Refuge poses a negligible risk to workers and members of the public. Please contact me at (303) 312-6246 if you have any questions regarding these matters.

Sincerely,



Gary Kleeman
Acting Rocky Flats Team Leader

cc Dean Rundle, FWS
Steve Gunderson, CDPHE
Joe Legare, DOE
Dave Shelton, KH
Administrative Records, T130G

2/1/00