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UNITED STATES
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION
WASHINGTON, D.C. 20545

MAY 20 1975

ADMIN RECORD

H. C. Donnelly, Manager
Albuquerque Operations

CONTAMINATED SOIL REMOVAL, ROCKY FLATS

U 4/2-155

Please refer to my memorandum to you, same subject, dated December 27, 1974.

As noted, approval of the soil removal is contingent on a Headquarters-approved environmental assessment. The revised assessment of February 14, 1975, has been found to contain certain deficiencies unacceptable to the Assistant Administrator for Environment and Safety and others. Consequently, the soil contaminated with plutonium southeast of the asphalt pad at Rocky Flats is not to be removed at this time.

Comments generated in Headquarters concerning the draft environmental assessment are furnished for your information.

F. B. Gilbert

Deputy for Ernest Graves
Major General, USA
Director of Military Application

Enclosure:
As stated

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COMMENTS FORWARDED TO DMA FROM THE ASSISTANT ADMINISTRATOR FOR ENVIRONMENT AND SAFETY ON THE SOIL REMOVAL PROJECT AND ENVIRONMENTAL ASSESSMENT, ROCKY FLATS

Governor Lamm, supported by his technical staff, concurred in the decision to delay removal at least until an adequate study of the action and alternatives is available.

The revised environmental assessment of February 14, 1975, is much improved over the initial version of June 1974. However, it is deficient, largely because the assessment fails to give adequate support to its recommendation for removing contaminated soil, or to give adequate consideration to alternatives associated with this proposed action.

Numerous substantive points which should be helpful in revising the current draft are flagged in the enclosed reviews. However, some of the more important points and ramifications of the February 14 assessment are as follows:

1. The document fails to state what change in air concentration can be expected to occur from the cleanup. It avoids assessing the dosimetric impact of the removal on man--both occupationally exposed and the general public. The only dose calculation given is that for a past condition.
2. There is a real possibility that the air concentrations will not decrease significantly as a result of the cleanup; this is because the amount to be removed relative to the amount remaining is small, and because there may be a continuing operational source. If concentrations do not decrease, as the document allows the reader to believe, then we may have a public relations problem.
3. Particularly important, in view of public availability of the Environmental Assessment (EA) under Freedom of Information Act, is the fact that the rationale for dismissing alternative (c) (postpone removal) is obscure. If there is no immediate problem, then why the rush? More than one reviewer believes that the several alternatives are inadequately treated.
4. The document in several places cites data, charts, and analogue experience not yet available, and proposed, but not funded, research as evidence to support the removal.
5. The statement regarding the ability to establish good vegetation cover is not documented in the EA.
6. The document does not contain the data that was used in drawing conclusions and is short of references and documentation to support its testimony.
7. The pickup of soil within any specified contamination interval leads to: (a) implied endorsement of specific contamination levels as to what