

city of arvada
8101 RALSTON ROAD
ARVADA, COLORADO 80002
PHONE 303-421-2550

RECEIVED
U.S.D.O.E.
R.F.O. - MAIL ROOM

Mayor and City Council
431-3000

1990 NOV 26 A 8:10

November 21, 1990

Ms. Beth Brainard
Public Affairs Officer
U.S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE: City of Arvada's Comments on the Proposed Surface Water Interim Measures/Interim Remedial Action Plan and Decision Document for the 902 Pad, Mound, and East Trenches Area (OU-2)

Dear Ms. Brainard:

The City of Arvada appreciates the opportunity to comment on the Proposed Surface Water Interim Measures/Interim Remedial Action (IM/IRA) Plan and Decision Document for OU-2. We provide our comments in hopes of having an impact on the future safe operations at the plant and on remediation of existing contamination. Below please find our comments.

1. Arvada is encouraged by the Department of Energy's (DOE) efforts to introduce interim measures to lessen or control existing environmental contamination at Rocky Flats until such time as full and final cleanup plans can be developed and implemented for contaminated areas. However, we are concerned that the interim measures have a positive effect in thwarting further contamination and that through their implementation, existing contamination is not exacerbated. For instance:
 - A. It is imperative that all best management practices, to control the impact of construction activities and their effects on releasing further soil contamination, are put in place.
 - B. Strict compliance with dust suppression requirements must be implemented to help assure that contaminated soil is not spread further across both Rocky Flats and off site lands.
 - C. Pumper truck travel from areas within Women Creek to the treatment facility should be restricted when winds are at such a velocity that dust dispersion becomes a problem at the site.

ADMIN RECORD

A-OU02-000140

MHS
20-7

2. Given the fact that great expense and planning has gone into the construction of a separate treatment facility in the Women Creek drainage at the 881 Hillside, we are concerned with the decision to truck radionuclide contaminated Women Creek seep water to the Walnut Creek Basin for treatment. If Women Creek water was treated at Hillside 881, or the process waste system, the Walnut Creek system could be downsized and treatment of only those contaminants found in that basin would have to be treated there.

The added expense for treatment of Women Creek water, at the new facility, when it contributes approximately only 20% of the total volume, seems wasteful. Given the expense of equipping a treatment facility in Walnut Creek to treat radionuclides, of which none exist in Walnut Creek, it seems more logical to treat Women Creek contaminated seep water at a facility that is already equipped to treat radionuclides. Based on the volumes of Women Creek seep discharge, there should be no problem with the Hillside 881 or process waste systems treating those waters efficiently.

The City of Arvada is also concerned with the transfer of radionuclide contaminated water from one drainage basin to another. If treatment of the Women Creek water cannot meet standards for discharge into Walnut Creek, you should not be contaminating the Walnut Creek Basin with radionuclides which had not originated in that basin.

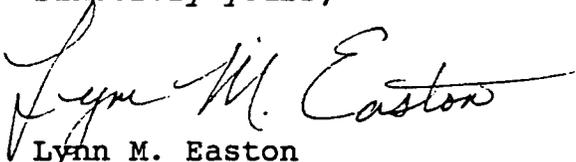
3. The treatment facilities, designed to treat surface water contamination at OU-2, are designed to treat a maximum of 52 gallons per minute. This flow is based on historic average annual flows from the seeps in question for both drainage basins. Our concern is that, during high rain or snow periods, when water infiltrates the soil at higher rates and acts to flush the contamination through the seeps, the treatment facility is not designed to treat greater volumes of water.
4. The City of Arvada has a concern with the capability of the proposed treatment facility meeting Applicable or Relevant and Appropriate Requirements (ARAR's) to the greatest extent possible. It is imperative that treatment facilities, capable of meeting all ARAR's are used in the Walnut Creek Basin. It is pointless to construct, at great expense, a facility which cannot treat water to a degree that it meets applicable

Beth Brainard
November 21, 1990
Page 3

standards. We question why water, which does not meet standards, should be treated by a system to a point where it still does not meet standards. We urge DOE to use proven technologies, which will meet all applicable standards, for discharge.

Thank you again for the opportunity to comment on the proposed IM/IRA Plan and Decision Document for OU-2. We hope that these comments will be reviewed and incorporated where appropriate within the planning and design process for the IM/IRA action at OU-2. If you have any questions relating to these comments, please phone Callie Videtich at 431-3042 for assistance.

Sincerely yours,

A handwritten signature in cursive script that reads "Lynn M. Easton". The signature is written in dark ink and is positioned above the typed name and title.

Lynn M. Easton
Mayor