Woman Creek Reservoir Authority
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December 19, 2016

Fourth, 5 Year CERCLA Review Comments
United States Department of Energy
11025 Dover Street
Suite 1000
Westminster, CO 80021

Re: Recommendations for the Fourth Five-Year CERCLA Review of the Rocky Flats Site
Attachment: WCRA Technical Memorandum - Opposition to DOE Proposal to Breach Pond C-2 Dam and Proposed Solution

Dear Mr. Surovchak:

I am writing on behalf of Woman Creek Reservoir Authority (the "Authority"), a political subdivision and public corporation of the State of Colorado created under C.R.S. 29-2-204.2. The Authority is the owner and operator of Woman Creek Reservoir, located on Woman Creek just west of Indiana Street, immediately adjacent to the historical boundaries of what has been formerly known as the Rocky Flats Plant Buffer Zone. The Reservoir physically separates Standley Lake, the drinking water source for the Cities of Northglenn, Thornton and Westminster, from surface water leaving the Rocky Flats Site. I am writing to provide input for your consideration as you develop the Fourth Five-Year Review Report for the Rocky Flats Site.

Based on the Authority's long-term and ongoing participation in technical meetings and review of Rocky Flats Site data, the following two recommendations for the Five-Year Review are offered:

Recommendation #1: Continue to Require a Monthly Frequency for Inspections of the Original Landfill and Require Additional Monitoring of Up-Gradient Groundwater Levels

Major hillside failures/rotational slumping events have occurred at the Original Landfill (OLF) in recent years, as documented in contact records from 2008, 2013, and 2015 (CR 2008-07, CR 2013-02, and CR 2015-03). As recommended in the Third Five-Year Review, it seems appropriate that ongoing monthly monitoring of the OLF again be required. Further, as DOE/LM is in the process of determining appropriate engineering solutions to this ongoing issue attributable to ground slopes and groundwater, it seems prudent that recommendations in the Fourth Five Year review include direction for up-gradient groundwater level monitoring at a frequency of at least weekly. DOE/LM has reported that they are conducting higher frequency up-gradient groundwater level monitoring, but specifically requiring it in the five year review

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will ensure that it will continue as engineering solutions are developed, implemented, and ultimately tested by nature over the next five years.

Recommendation #2: Include Discussion of the Adaptive Management Plan, Including Technical Points from the Authority's Position Paper

The Third Five-Year Review described the Adaptive Management Plan (AMP), which was triggered by concern about proposed breaching of the terminal pond dams. This included a discussion of the data to be collected and noted the delayed timeframe for reconsidering breaching of the terminal pond dams (delayed to 2018-2020). It seems appropriate to provide an update on that effort in the upcoming five-year review. For consideration as part of that update, the Authority offers the findings from its evaluation of historical and AMP data. That analysis is presented in a position paper describing a technical basis for continued opposition to breaching the Pond C-2 dam. That paper is attached to this letter and summarized briefly below:

The Authority asserts that breaching of the Pond C-2 dam would represent an irreversible loss of an effective contingency to protect downstream water quality. The ponds have been shown to remove ~90% of Pu and Am in surface water when operated in batch-and-release mode. It is acknowledged that no reportable conditions have occurred at WOMPOC during the AMP sampling period over a wide range of hydrologic events; however, there is still a need for the Pond C-2 dam in certain circumstances. Specifically, wildfire is an as-yet untested event that is inevitable. Such an event could pose a significant threat to downstream water quality if the C-2 dam could not be closed.

WCRA recommends not breaching the Pond C-2 dam, but instead continuing to operate in flow-through mode with a contingency plan to trigger closing the dam to retain water under specific critical circumstances. This proposed solution would reduce pre-AMP operating costs by eliminating routine batch-and-release operations and evaporative depletions, while expanding habitat. WCRA believes this proposed solution is supported by the Site data and meets the Purpose and Needs noted by DOE in the Environmental Assessment for dam breach, while maintaining a proven-effective contingency to protect downstream water quality.

Thank you for your time and consideration.

Sincerely,

Tamara Moon, President
Woman Creek Reservoir Authority

Ec: Carl Spreng, Colorado Department of Public Health and Environment
Vera Moritz, U.S. Environmental Protection Agency
David Abelson, Rocky Flats Stewardship Council
Josh Nims, Woman Creek Reservoir Authority
James Boswell, Woman Creek Reservoir Authority

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Lee Johnson, Attorney for Woman Creek Reservoir Authority

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