

# SIERRA CLUB

May 20, 1996



Rocky Mountain Chapter  
777 Grant Street Suite 606 Denver, Colorado 80203 303 • 861 • 8819

Ms Susan J. Chaki, Correction Action Unit Leader, Federal Facilities Program  
Colorado Dept. of Public Health and Environment  
4300 Cherry Creek Dr., S.  
Denver, CO 80222-1530

Dear Ms Chaki:

The RMA Subcommittee of the Rocky Mountain Chapter of the Sierra Club is concerned about the type of clean-up action being proposed at Rocky Mountain Arsenal and the Corrective Action Management Unit (CAMU) supporting it. Although landfilling hazardous materials is better than capping them in place, we are concerned that the majority of material placed in the landfill will not be treated. This and other concerns are presented below.

1. The original intention of a CAMU was to encourage the development and use of alternative clean-up technologies. To this end it allowed the possibility of a slightly lower level of 'clean' in order that a less dangerous or invasive means was used to detoxify an area. However, this CAMU's purpose is not to support alternative technologies, but rather to justify old questionable actions: landfilling and capping. Only a small proportion of the material being placed into the landfill and areas to be capped will be treated first to insure against future movement of contaminants. We find this unacceptable as it only invites future problems and hence expenditures that should be taken care of now. It also does not guarantee honesty of public officials in reporting any future problems, outline the types of actions to be taken when these problems occur, or explain how responses to them will be funded.
2. We understand that a CAMU must be applied for from the state department of health. In the documentation written by Harding Lawson Associates on behalf of the U. S. Army this is not evident. Throughout the Summary document reference to the CAMU was not in terms of 'will be applied for' but rather stated as 'will be designated'. This implies to us that the CAMU process is somewhat questionable since this document seems to disallow the possibility of a rejection or any question regarding the clean-up methods to be used.
3. We object to the process followed for the review of this document. Little information was initially communicated regarding the CAMU. The documents explaining it were not made easily available until after an extension to the original comment period had been granted. The initial comment period also reflected a time period more appropriate to a very small site (e.g. a dry cleaners) and not one as complicated as RMA. This hints that the process of deciding if a CAMU should be granted or not is being prejudiced by promises made between signatories to the Conceptual Agreement and concerns that the Record of Decision could be delayed instead of whether or not it is a good and honest document.

You have received in the past our objections to the Conceptual Agreement. It does seem that the CAMU process is being used by those supporting that agreement to their own ends. Therefore we encourage the Colorado Department of Public Health and the Environment to reject this CAMU. Granting it will not serve the best interests of the citizens of this state now or in the future but rather merely provide a means of pushing through a questionable 'clean-up'.

Sincerely,

Sandra A. Horrocks  
Subcommittee Chairperson



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