

**From:** Tanya Holtz <holtzart@gmail.com>  
**To:** <Walter.Avramenko@state.co.us>  
**Date:** 11/29/2010 3:52 PM  
**Subject:** Comment on the NFA Policy and Guidance

Dear Mr. Avramenko,

I thank you for taking time to meet with the Public regarding the Policy for a “No Further Action” Determination and associated Guidance. I recognize and am grateful for your ongoing work on these documents. Most of my concerns were eliminated upon discussing the details of the Policy and Guidance with you and your colleagues. After our meeting and rereading the documents I have the following comments which I believe will help to clarify the intent of the document and capture details of our discussion that may be absent from the current text.

I do appreciate your time and attention to the safety of our State’s water resources.

Sincerely,

Tanya Holtz

Resident and Mother  
1224 Picardy Place  
Lafayette, Colorado 80026

General Comments:

- 1) Provide text to clarify what will happen in the event a site as a ROD, or some other existing and governing decision document, with regard to applying for NFA designation.
- 2) Provide text to discuss mechanism for additional data and information to come to light on a site granted NFA designation when there is no additional monitoring requirement.
- 3) I strongly urge you to consider adding a monitoring requirement for some time period after the NFA designation and cessation of remedial activities to ensure the natural attention is operating and contaminant trends are continuing to decline.
- 4) Provide text to describe how Public stakeholders will be invited to participate with the Review Board?
- 5) Public notice and comment period should be required for all sites considering NFA status. Notice should go out to as many media outlets as possible for a site including local papers, radio stations, and public websites.
- 6) Regarding Line of Evidence 1: For all reports there should be a requirement that a clear distinction be made between raw data, interpreted data, assumptions and conclusions. Data must be provided as evidence to support any reported conclusions. Rationale must be provided based on

accepted, peer reviewed scientific and engineering reports for every assumption.

7) Pg 15 Glossary: Define “Reasonably Anticipated Exposures”

8) Please provide a database of sites applying for and approved for NFA status readily accessible to the Public via the CDPHE website. Enable mapping functionality and the ability to query water level and quality data reported for the sites.