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**PROPOSED RESPONSES TO THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY (U.S.
EPA) COMMENTS ON THE FINAL RISK
ASSESSMENT WORK PLAN ADDENDUM**

09/24/92

**DOE-2763-92
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LETTER**



Department of
Fernald Environmental Management Project
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SEP 24 1992

DOE-2763-92

Mr. James A. Saric, Remedial Project Director
U.S. Environmental Protection Agency
Region V - 5HR-12
230 South Dearborn Street
Chicago, Illinois 60604

Mr. Graham E. Mitchell, Project Manager
Ohio Environmental Protection Agency
40 South Main Street
Dayton, Ohio 45402

Dear Mr. Saric and Mr. Mitchell:

**PROPOSED RESPONSES TO THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
(U.S. EPA) COMMENTS ON THE FINAL RISK ASSESSMENT WORK PLAN ADDENDUM**

Reference: Letter, J. A. Saric to J. R. Craig, "Comment/Response on the
Final Risk Assessment Work Plan Addendum," dated August 6,
1992

The Department of Energy (DOE) has reviewed the comments dated August 6, 1992, on the Risk Assessment Work Plan Addendum. In your letter, you noted that "two comments need to be further addressed by U.S. DOE." It is not clear from your letter or its enclosure which specific comments need addressing. The enclosure to your letter is a memorandum for Ms. Pat Van Leeuwen of U.S. EPA, Region V. DOE has reviewed this memorandum and proposes the following responses:

"New guidance continues to be issued by headquarters and generally affects risk assessments in drafts or under development. I have two new pieces of guidance which should be submitted to the contractors with the next set of comments. The first is the Supplemental Guidance to RAGS: Calculating the Concentration Term, issued in May 1992. This guidance should not require any changes in the Work Plan Addendum. The second is a memorandum from Henry Longest referring to Habicht's memorandum of February 26, 1992, on risk characterization. The critical issue here is that the latter memorandum has called for incorporation of an analysis of uncertainty in all new risk assessments; draft risk assessments are included in this category. The uncertainty analysis is to be achieved

by a calculation of the Central Tendency in addition to the Reasonable Maximum Exposed (RME) individuals. These two documents are enclosed, along with some additional information on calculating risks from radionuclides."

Response: The Risk Assessment Work Plan Addendum is intended to present the methods, models, and many parameters that are to be used in human health risk assessments at the Fernald Environmental Management Project (FEMP). New guidance that affects risk assessments under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) will continue to be provided by U.S. EPA. The Risk Assessment Work Plan addendum is not intended to be a "living document" that is continually updated to reflect changing guidance from U.S. EPA. However, each risk assessment that is conducted after approval of the Risk Assessment Work Plan Addendum will include, to the extent practical, changes in methods, models, and parameters necessitated by new guidance received from the U.S. EPA prior to submission of each risk assessment report to the U.S. EPA. Following receipt of supplementary or new guidance from U.S. EPA, DOE will evaluate the impact of such guidance on ongoing work. Any schedule impacts to primary or secondary documents necessary to incorporate the revised guidance will be identified to U.S. EPA consistent with Section XVIII of the Amended Consent Agreement. Such changes, and other deviations from the Risk Assessment Work Plan Addendum will be noted in each risk assessment report.

"Comment No. 18/Original Comment No. 120. The response to the comment is acceptable as long as it is mutually agreed that the accident and fatality rates from hazardous material transporters will be used for off-site scenarios. Also, please note that the correction to Section 10.2.3.2 is on page 22, not page 23 as stated."

Response: DOE agrees that the accident and fatality rates for hazardous material transporters will be used, if such statistics exist, for off-site scenarios.

"Comments No. 20/Original Comments No. 146/156/273. The response presented here does not reflect that DOE has, in fact, received additional comments from Paul White, Statistician, U.S. EPA, Exposure Assessment Group, Washington, D.C., and has agreed to changes with respect to the treatment of background which affect the selection of Chemicals of Concern, as well as the calculation of the exposure point concentration (discussed in Comment No. 22). It is also understood that EPA guidance will be followed in all statistical analyses and that may be applicable to the analysis of hot spots as outlined in the Guidance for Data Useability in Risk Assessment, Part A, 9285.7-09A, April 1992. Based on these notations, the response to this comment is accepted."

Response: Mr. Saric has advised DOE that Mr. White's comments were incorporated into the package of comments provided previously to DOE as the official U.S. EPA comments on the Risk Assessment Work Plan Addendum.

"Comment No. 23/Original Comments No. 233/72. Response to comments is acceptable. EPA should be informed of the values to be used for the Central Tendency and the RME for all exposure pathways. Also please note that the table of Human Physiological Parameters, Section 7.0, page 17, still references the now outdated draft dermal guidance. The proper reference should be Dermal Exposure Assessment: Principles and Applications, EPA/600/8-91/011B January 1992. It should be further noted that the values listed in this table are for the Central Tendency, not the RME exposure."

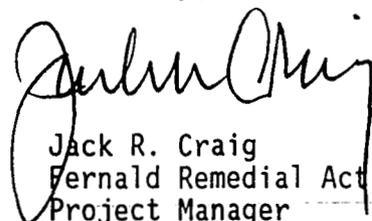
Response: Although the concept of calculating risks by using Central Tendency values of exposure assessment parameters has been proposed by U.S. EPA, specific guidance for implementing this approach for risk assessments has not been issued. DOE will perform risk assessments in accordance with new guidance that is received from U.S. EPA prior to submission of risk assessment reports, as provided for in the Amended Consent Agreement.

The referenced for dermal exposure assessment will be given in future risk assessment reports. This deviation from the Risk Assessment Work Plan Addendum will be noted in future risk assessment reports.

We feel that these responses adequately address U.S. EPA comments in order that U.S. EPA can consider the document final.

If you or your staff have any questions, please contact me at FTS/Commercial (513) 738-6159.

Sincerely,



Jack R. Craig
Fernald Remedial Action
Project Manager

FN:Craig

cc:

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