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CORRES CONTROL
INCOMING LTR NO

States Government

Department of Energy
Rocky Flats Field Office

memorandum

0270ORF94

DUE 7/8/94
DATE 7/15/94

ACTION **STIGER**

DIST	TR	ENC
BURLINGAME, A H		
BUSBY, W S	X	X
CARNIVAL, G J		
CORDOVA, R C		
DAVIS, J G		
FERRERA, D W		
RAY, R E		
EIS, J A		
LOVER, W S		
OLAN, P M		
ANNI, B J		
EALY, T J		
HEDAHL, T G	X	X
ILBIG, J G		
UTCHINS, N M		
ACKSON, D T		
ELL, R E		
ESTER, A W		
ARX, G E		
CDONALD, M M		
KENNA, F G		
ORGAN, R V		
ZZUTO, V M		
OTTER, G L		
ANDLIN, N B		
ATTERWHITE, D G		
CHUBERT, A L		
CHWARTZ, J K		
ETLOCK, G H	X	X
TIGER, S G	X	X
OBIN, P M		
ORHEIS, G.M.		
ILSON, J.M		
HOPKINS, J K	X	X
VERTUCCI, F A	X	X
ROBERTS, R	X	X

1111 0 - 1002

ER BT 07299

Programmatic Preliminary Remediation Goals

Sue Stiger Associate General Manager
Environmental Restoration Management
EG&G Rocky Flats Inc

Please find attached the Department of Energy/Rocky Flats Field Office (DOE/RFFO) and U S Environmental Protection Agency (EPA) comments related to Preliminary Remediation Goals (PRGs) contained in the following documents

- (1) Development of Remedial Action Objectives 881 Hillside Area (OU 1) Technical Memorandum No 10 dated April 1994 (Final) and
- (2) Programmatic Preliminary Remediation Goals dated June 1994 (Draft Final)

We request that EG&G modify document no 2 above per the attached DOE/RFFO comments In addition we request that this same document be modified as appropriate per attached EPA comments as follows

- (1) General Comments
 - (a) comment no 3
 - (b) comment no 4
- (2) Specific Comments
 - (a) comment no 3
 - (b) comment no 4
 - (c) comment no 5
 - (d) comment no 7
 - (e) comment no 8
 - (f) comment no 9

With regard to EPA Specific Comment nos 1 2 and 3 we request that EG&G provide rationale as to why the standards for volatile organic compounds (VOC) in groundwater (or surface water) are protective for all VOC inhalation pathways In this way we can eliminate VOC inhalation pathways that do not add value This rationale should be included in the text of the revised programmatic risk based PRG document.

CORRES CONTROL	X	X
ADMIN RECORD/080	X	2
PATS/T130G	X	

Reviewed for Addressee
Corres Control RFP
7/11/94 409
DATE BY

R f Lt #

DOE ORDER # 5400, 1

ADMIN RECORD

7-00001-00000007

Jul 11 1994

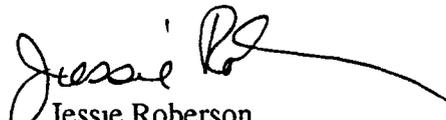
J 07 1994

S Stiger
ER BT 07299

In addition DOE/RFFO received a June 15 1994 letter from EPA (attached) regarding a sand and gravel mining exposure scenario to be added to our existing exposure scenarios for the Operable Unit (OU) baseline risk assessments and programmatic PRGs. This results from Western Aggregates recent application for a sand and gravel mining permit in the Rock Creek drainage. In light of CCR 34-1 305 (1) (Preservation of commercial mineral deposits for extraction) we agree that this scenario will be necessary at a subset of OUs at the Rocky Flats Site. Thus we request that EG&G evaluate this scenario and provide DOE/RFFO with the associated exposure parameters along with a list of the impacted OUs.

We request that the revised programmatic risk based PRG document and the additional exposure scenario information be submitted to DOE/RFFO by July 15 1994. In addition OU specific schedule and cost impacts resulting from the programmatic risk based PRG and exposure scenario modifications should be included with the July 15 1994 deliverable.

With regard to EPA general comment no. 1 on the programmatic PRGs the development of ecological PRGs is consistent with the mandate of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) Resource Conservation and Recovery Act (RCRA) and Colorado Hazardous Waste Act (CHWA) which require the protection of human health and the environment. Thus we request that ecological PRGs be considered for use in the Feasibility Studies/Corrective Measures Studies (FS/CMS) at the Rocky Flats Site. Ecological PRGs should be discussed in the ecological receptor FS/CMS methodology document requested by DOE/RFFO in memorandum ER BKT 05262 dated May 6 1994. EG&G in memorandum SGS 326 94 dated May 24 1994 stated that the methodology document would be submitted to DOE/RFFO by July 8 1994. If the ecological PRG evaluation will impact this submittal date we request that this be communicated to DOE/RFFO as soon as possible.


Jessie Roberson
Acting Assistant Manager
for Environmental Restoration

Attachments

cc /w Attachments
N Castanada ER RFFO
B Thatcher ER RFFO
F Lockhart ER RFFO
J Hopkins EG&G
R Roberts EG&G
F Vertucci EG&G