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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

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HAZARDOUS MATERIALS
MANAGEMENT

OCT 7 1994

Ref: 8HWM-FF

Mr. Steve Slaten
U.S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

Re: Operable Unit 2
Contaminants of Concern

Dear Mr. Slaten:

In selecting contaminants of concern (COCs) for the human health risk assessment, EPA typically uses professional judgement before eliminating chemicals from consideration in the baseline risk assessment. In general, we consider whether a contaminant is a Class A carcinogen, is subject to a high level of public concern, or exceeds a human health risk based concentration. Applying this judgement to Operable Unit 2 (OU 2) potential contaminants, EPA recommended to DOE that antimony, beryllium, manganese, and arsenic be retained as groundwater contaminants of concern chiefly because of the magnitude of exceedance of the risk based concentration but also because of continuing uncertainty about whether these chemicals exist in concentrations greater than background in OU 2.

In discussions over the last several days, EPA and DOE agreed that in order to address EPA's concerns, the risks associated with exposure to these chemicals in groundwater will be quantitatively assessed (i.e., in the same manner as other OU 2 COCs) and included in the uncertainty analysis portion of the baseline risk assessment. While DOE will not consider these chemicals as OU 2 contaminants of concern per se, the consequence of eliminating them from the list of OU 2 COCs will be evaluated.

With this understanding, EPA approves Technical Memorandum Number 9 for OU 2. Our point of contact for OU 2 is Bill Fraser, (303)294-1081.

Sincerely,

Martin Hestmark, Manager
Rocky Flats Project

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