

# STATE OF COLORADO

## COLORADO DEPARTMENT OF HEALTH

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January 29, 1991

Roy Romer  
Governor

Thomas M. Vernon, M.D.  
Executive Director

Mr. Martin Hestmark  
U.S. Environmental Protection Agency  
Region VIII  
999 18th Street, Suite 500, 8WM-C  
Denver, Colorado 80202-2405

**RE: REVIEW AND COMMENT: REMEDY REPORT - OPERABLE UNIT 3, SWMU  
199, FINAL DRAFT, OCTOBER, 1990**

Dear Mr. Hestmark,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document submitted by DOE and it's prime operating contractor, EG&G. The Division's comments are attached.

The Division is concerned that the present form of this document does not fulfill the requirements of the IAG, particularly the risk assessment portions. However, there is also concern that existing data will not support a rigorous health risk assessment (though the data is not presented and this can not be verified). It may be necessary to accept a qualitative risk assessment now, but require that the RFI/RI be structured so that the data gaps can be closed. A rigorous health risk assessment can then be submitted later that would satisfy the requirements of the IAG.

If you have any questions concerning these comments, please call Joe Schieffelin of my staff at 331-4421.

Sincerely,

Gary W. Baughman  
Unit Leader, Hazardous Waste Facilities  
Hazardous Materials and Waste Management Division

cc: Dan Miller, AGO  
Robert M. Nelson, DOE  
Fraser Lockhart, DOE  
James O. Zane, EG&G  
Tom Greengard, EG&G  
Barbara Barry, RFPU

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REMEDIAL DIVISION

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ADMIN RECORD

A-DU03-000075