UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

5U 3

FEB -1 1993

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Ref: 8HWM-FF

Richard J. Schassburger
U.S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, CO 80402-0928

RE: Operable Unit 3
Areas of Concern

Dear Mr. Schassburger:

We have received and reviewed the October 6, 1992, draft report identifying Operable Unit (OU) 3 areas of concern. This draft report was submitted in partial response to our letter of August 4, 1992 which required DOE to delineate areas of concern and to inventory all third party construction projects within OU 3.

Our interest in third party activities is twofold. The activities must not pose unacceptable risk to workers and nearby residents and the activities must not be inconsistent with CERCLA. Therefore, DOE should have used the conventional methodology used at CERCLA sites and contained in the Human Health Evaluation Manual, Part B, Development of Risk-Based Preliminary Remediation Goals (RAGS- B) to ensure these concerns are addressed. When contaminant concentrations are at or below the exposure levels calculated using conventional methods, the probability is low that adverse human health effects will be manifest.

The veracity of the results in the DOE document cannot be confirmed because important methodologic details were not provided and RAGS-B was not referenced. It appears that DOE took an ad hoc approach which may or may not follow EPA guidance. DOE's choice, while not wrong, is very confusing, is not well explained, and provides no basis for a determination of consistency with CERCLA. The results of the numerous calculations, which we believe were an attempt to demonstrate uncertainty, are not put into perspective for the reader.

We require that DOE revise the document by explicitly following RAGS-B. Not only will this result in a logical document, the results will later be useful in putting the OU 3 remedial investigation into perspective. Also, since our final remedy decision may be based on a future residential land use assumption and on the methodology in RAGS, to ensure consistency with CERCLA, DOE must use the default exposure parameters associated with residential land use and include soil ingestion,

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inhalation of radionuclide-bound particles, and external radiation.

Finally, after reviewing the report, we believe that DOE must present the criteria it used to eliminate and include data in the isocontouring process. There are multiple data sets available, and DOE must be careful not to give the appearance that the data is being manipulated to justify a pre-determined conclusion. The isocontour map does not clearly indicate physical features and boundaries. This must be revised to present a map which is useful to regulators and the general public.

We expect DOE to make these revisions to the OU 3 Areas of Concern document. We are also prepared to discuss these comments in detail. During the detailed discussion of these documents we would also expect DOE to identify when this document can be revised. The detailed discussion should occur by February 12, 1993. In the event DOE will not revise the document to incorporate EPA comments, EPA is prepared to independently prepare an OU 3 Areas of Concern document for public release. Please contact Bonnie Lavelle at (303) 294-1067 to establish the meeting to discuss these comments and to define a delivery timetable for this document and the next phase, the inventory of construction projects.

Sincerely,

Martin Hestmark

Martin Hestmark, Manager
Rocky Flats Project

cc: Robert Birk, DOE
Michael Guillaume, EG&G
Joe Schieffelin, CDH
Carl Sprang, CDH

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