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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500

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DENVER, COLORADO 80202-2405

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Ref: 8HWM-FF

Mr. Robert M. Nelson, Jr., Manager
Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE: OU 5 RFI/RI Workplan

Dear Mr. Lockhart:

On January 10, 1991, EPA met the Colorado Department of Health (CDH) and Rocky Flats representatives to discuss risk assessment and environmental evaluations as related to CERCLA and to discuss the OU 5, Woman Creek, preliminary workplan. Several points of concern were identified during the discussions. In order to assist preparation of the draft OU 5 workplan which is to be submitted on April 5, 1991 to EPA for review and approval, these points of concern are summarized below.

EPA emphasizes the need for the DOE and EG&G OU managers to understand the necessary elements of risk analysis in order to incorporate them into OU workplans. It is important to stress the need to develop a risk assessment conceptual model parallel with models for evaluating the nature and extent of contamination. From these models, data quality objectives (DQOs) are derived for development of sampling and analysis plans. Thus, sample locations are determined by defining the information needed to identify potential pathways and receptors of contamination and the type, media, concentrations and extent of contamination. This approach allows for collection of data that is useful in determining the and extent of contamination as well as performing risk evaluations.

Environmental evaluations are required to characterize the impact of contamination on the biota of the area. The nature of the study is such that areas larger than the particular individual hazardous substance sites must be evaluated. The study must be timed for optimum sampling and prior to major remedial activities to determine impacts or potential impacts on biota due to contaminants present. It was indicated that the current subcontractor problem at the Rocky Flats Plant may cause delays in performing environmental evaluations which will eventually delay OU workplan submittals. It is hoped that the subcontractor problems can be worked out in a timely manner to keep workplans on schedule.

ADMIN RECORD

EG&G is drafting technical memoranda addressing risk

A-OU05-000003

Additional air monitoring stations will be necessary to determine the exposure of resuspended radionuclides in soil. EG&G agreed to examine the potential exposure via the air pathway and to install air monitoring equipment if necessary. During this evaluation, the steps for installing air monitoring equipment in the Woman Creek drainage area will be undertaken by EG&G.

EPA is recommending that a soil stabilizer be placed on the areas of concern to prevent release of radionuclide contaminants into the air or surface water. The type of soil stabilizer and method applied must receive EPA approval prior to application. If soil stabilization is not possible, then the additional air and surface monitoring must be expedited.

In summary, the opportunity to meet with EG&G personnel working on the project was very informative and hopefully will help further development of the OU workplan by your staff. EPA wishes to keep in close communication on workplan issues as they come up. If you or members of your staff have questions regarding the issues mentioned above, please contact Patricia Corbetta at (303) 294-1135.

Sincerely,



Martin Hestmark, Team Leader
Federal Facilities Remedial Branch

cc: Patricia Corbetta, 8HWM-FF
Gary Baughman, CDH
Joe Schieffelin, CDH
Tom Olsen, DOE
Tom Greengard, EG&G
Tom Ottensman, EG&G