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Department of Energy

Rocky Flats Field Office

# memorandum

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ROCKY FLATS PLANT  
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| DIST.          | LTR | ENC |
|----------------|-----|-----|
| BLINGAME, A.H. |     |     |
| BY, W.S.       |     |     |
| KNIVAL, G.J.   |     |     |
| DOVA, R.C.     |     |     |
| IS, J.G.       |     |     |
| IN, T.M.       |     |     |
| IRERA, D.W.    |     |     |
| Y, R.E.        |     |     |
| TON, D.L.      |     |     |
| S, J.A.        |     |     |
| VER, W.S.      |     |     |
| AN, P.M.       |     |     |
| INI, B.J.      |     |     |
| LY, T.J.       |     |     |
| JAH, T.G.      |     |     |
| IG, J.G.       |     |     |
| LOWELL, L.J.   | X   |     |
| CHINS, N.M.    |     |     |
| KSON, D.T.     |     |     |
| L, R.E.        |     |     |
| STER, A.W.     |     |     |
| X, G.E.        |     |     |
| JART, D.       |     |     |
| DONALD, M.M.   |     |     |
| GOVERN, L.J.   |     |     |
| ENNA, F.G.     |     |     |
| IKERT, J.G.    |     |     |
| ZUTO, V.M.     |     |     |
| TER, G.L.      |     |     |
| TERWHITE, D.G. |     |     |
| FRADER, D.C.   |     |     |
| HUBERT, A.L.   |     |     |
| HWARTZ, J.K.   |     |     |
| LOCK, G.H.     |     |     |
| BER, S.G.      | X   |     |
| ORHEIS, G.M.   |     |     |
| CHER, C.       | X   |     |
| BLSTEIN, N.    | X   |     |
| LAST, E.       | X   |     |

REF: KM:08074

Interim Guidance on Operable Units 5 and 6 Risk Assessment Calculations

Sue G. Stiger, Program Director  
Environmental Restoration Project  
EG&G Rocky Flats, Inc.

The purpose of this memorandum is to provide interim guidance on the inclusion of arsenic, barium, and nickel in the risk calculations for Operable Unit (OU) No. 5 and OU 6. Recent communications from the regulatory agencies have indicated that these chemicals should be included in the risk calculations even though documents submitted by the Department of Energy (DOE) regarding OU 5 and OU 6 indicated these are not chemicals of concern. The DOE is presently in a dispute resolution over the inclusion of arsenic as a chemical of concern for OU 3. Based on the technical arguments previously presented to the regulatory agencies, and in light of the OU 3 dispute, it is the DOE's position that arsenic should not be included in risk calculations for OU 5 or OU 6 until a decision has been reached on OU 3. All other work on OU 5 and OU 6 risk assessment should continue and not be impacted by this memorandum.

The DOE agrees that barium should be included in the risk calculation. Per discussion with the EPA, nickel should be included in the OU 5 risk calculation as a non-carcinogen only.

As discussed with your staff, please provide a comprehensive and exhaustive technical argument supporting the exclusion of arsenic as a Chemical of Concern in OU 5 and 6.

If you have any questions, please call Kurt Muenchow at extension 2184.

Jessie Roberson  
Assistant Manager for  
Environmental Restoration

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|---------------|---|---|
| RES. CONTROL  | X | X |
| IN RECORD/080 | X | 2 |
| S/T130G       | X |   |

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