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STATE OF COLORADO

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COLORADO DEPARTMENT OF HEALTH
Dedicated to protecting and improving the health and
environment of the people of Colorado

Apr 14 10 42 AM '94



Roy Romer
Governor

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Executive Director

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ACTION	LTR	ENC
DIST.		
ERMAN, H.S.		
ARNIVAL, G.J.		
OPP, R.D.		
ORDOVA, R.C.		
AVIS, J.G.		
ERRERA, D.W.		
RANZ, W.A.		
ANNI, B.J.		
EALY, T.J.		
EDAHL, T.G.		
LBIG, J.G.		
JTCHINS, N.M.		
ELL, R.E.		
BY, W.A.		
JESTER, A.W.		
AHAFFEY, J.W.		
ANN, H.P.		
ARX, G.E.		
SKENNA, F.G.		
ORGAN, R.V.		
ZZUTO, V.M.		
OTTER, G.L.		
ANDLIN, N.B.		
ATTERWHITE, D.G.		
CHUBERT, A.L.		
ETLOCK, G.H.		
TIGER, S.G.	X	X
JLLIVAN, M.T.		
WANSON, E.R.		
ILKINSON, R.B.		
ILSON, J.M.		

March 30, 1994

Mr. Robert L. Duprey, Director
Hazardous Waste Management Division
U.S. Environmental Protection Agency
Region VIII
999 18th Street, Suite 500, 8WM-C
Denver, Colorado 80202-2405

**RE: Resolution of Data Aggregation/Baseline Risk Assessment Dispute
at the Rocky Flats Plant**

Dear Mr. Duprey,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), hereby concurs with EPA's proposed resolution to the above referenced dispute. However, we do so with the following conditions:

- 1) The attached language explaining how the "conservative risk screen" will be conducted will be added to your proposal. This language has been reviewed by your staff and DOE staff and is, as far as we know, acceptable to both. As this screen is the first step in the risk evaluation process, we feel it is valuable to add explicit language to this proposal so that consistent correct application of the screen may be achieved.
- 2) The following changes are made to the text of your proposal as agreed to in staff conference calls on March 24 and 25, 1994:
 - a) first page, first paragraph, second sentence changed to "Example exposure areas for the Rocky Flats Plant site may be . . ."
 - b) second page, first paragraph, sixth sentence replaced with "This will be made on will be made on a case-by-case basis."
 - c) second page, third paragraph, fourth and fifth sentences changed to "The guidance states that . . . fewer than 10 samples per exposure area provides a poor estimate of the mean concentration. Data sets with 20 to 30 samples per

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ATS/T130G		

Reviewed for Addressee
Corres. Control RFP

1/14/94 CML
DATE BY

Ref Ltr. #

DOE ORDER # 5400.3

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

A-1009-000085

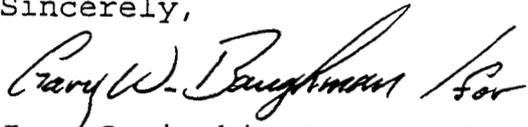
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exposure area provide fairly consistent estimates of the mean. All parties agree that uncertainties in the estimates of the mean concentrations will be addressed in the uncertainty analysis." Add the following sentences: "For OUs 2-7, additional field sampling in support of baseline risk assessment must be mutually agreed to by EPA, CDH, and DOE. On a case-by-case basis, with the approval of the regulators, geostatistics may be utilized to incorporate spatial continuity of data."

- d) Add the following definitions: **area of concern** = one or several sources grouped spatially in close proximity; and **source** = area defined by 1) contaminant levels exceeding background mean plus 2 standard deviations for inorganics and/or 2) detection limits for organics.

If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 692-3356.

Sincerely,



Joan Sowinski, Program Manager
Hazardous Waste Control Program

enclosure

cc w/enclosure:

Martin Hestmark, EPA
Shirley Olinger, DOE
Jessie Roberson, DOE
Sue Stieger, EG&G

Conservative Risk Screen for Sources⁽¹⁾ at the Rocky Flats Plant

This risk screen will be the first step in the risk assessment process used at Rocky Flats and will be the basis and justification for the type of next steps taken at a given OU (please see attached flow-chart).

The steps in the conservative risk screen are as follows:

1. An entire OU RFI/RI data base will be compared to background using the previously agreed upon Gilbert methodology. (flowchart, block 1)
 - The product of the background comparison will be a list of potential contaminants in the OU. This list will consist of all organic chemicals that exceed detection limit somewhere in the OU, and all inorganic chemicals whose OU population exhibits a significant statistical increase in concentrations compared to the background population either over the whole OU or within some portion of the OU.

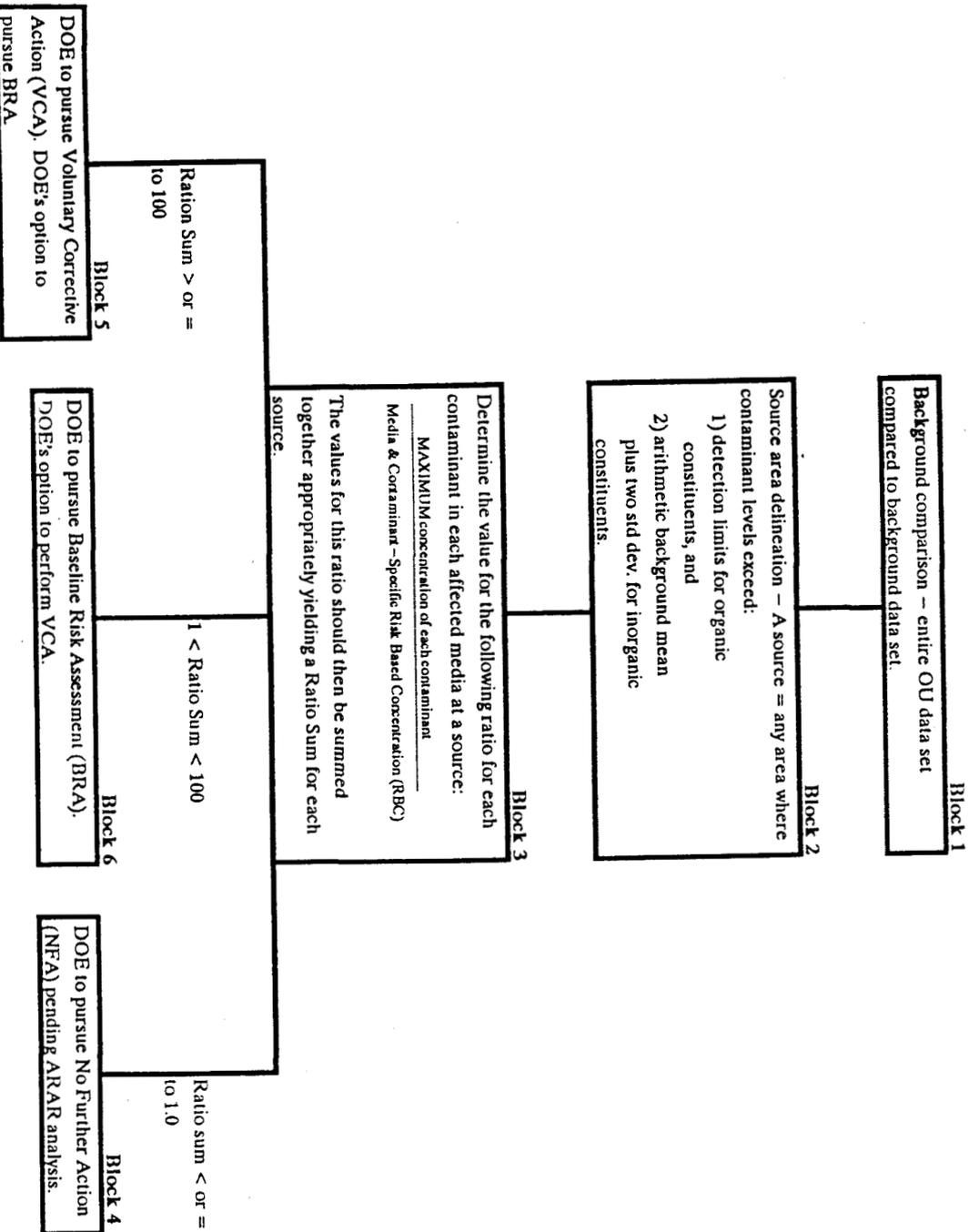
2. This list of potential contaminants will be used as the basis for the "nature and extent" evaluation for each OU. Within this evaluation, source areas will be delineated. For organic chemicals on the list, the delineation criteria will be the detection limit; for inorganic chemicals on the list, the delineation criteria will be the arithmetic mean of the background data set plus two standard deviations from the arithmetic mean. (flowchart, block 2)
 - It is recognized that each chemical in each medium may have a different spatial extent within a source. These different spatial extents do not affect the implementation of this screen. A "source," however, will be all contamination that can reasonably be tied together based on existing knowledge of the site, contaminant types, concentrations, rates of migration, etc.

3. For each potential contaminant in each medium, a medium-specific "risk based concentration", or RBC, must be calculated. These RBCs should be calculated based on: 1) direct "residential" exposure and intake parameters, 2) direct ingestion, dermal contact, and inhalation pathways only, and 3) assuming a carcinogenic risk of 1×10^{-6} and a non-carcinogenic hazard quotient of 1.0. (These RBCs could be calculated once site-wide since they are chemical-specific and not location specific.)

¹ Source = Area defined by 1) contaminant levels exceeding background mean plus 2 standard deviations for inorganics and/or 2) detection limits for organics

4. For each source delineated in #2 above, it is necessary to determine the **maximum** contaminant levels for each potential contaminant in each affected medium.
5. Once the maximum contaminant levels have been determined, each media/contaminant-specific maximum should be divided by its respective RBC. These maximum/RBC ratios for each contaminant should then be summed for each medium and then across all affected media in a source. Those sources where the ratio sum is less than 1.0 have a risk less than 1×10^{-6} and/or a hazard quotient less than 1.0. Those sources where the ratio sum is greater than 1.0 have a risk greater than 1×10^{-6} and/or a hazard quotient greater than 1.0. (flowchart, block 3)
6. For sources where the ratio sum was less than 1.0, DOE would pursue a "no further action" decision, pending an ARAR analysis (flowchart, block 4). For sources that have a ratio sum greater than 100, DOE would pursue a "voluntary corrective action" but could proceed with a Baseline Risk Assessment (BRA) at their discretion (flowchart, block 5). For sources where the ratio sum was between 1.0 and 100, DOE would pursue a BRA, but could perform a voluntary corrective action at their discretion (flowchart, block 6).

CONSERVATIVE RISK SCREEN



Per Gilbert methodology
previously agreed upon.

Per "nature and extent"
evaluation.

RBCs based on:
1) direct "residential" exposure
parameters, 2) direct ingestion
inhalation, and dermal contact,
3) 10E-6 carcinogenic risk and
1.0 hazard quotient.