

**DOCUMENT REVIEW: TECHNICAL MEMORANDUM NUMBER 2
HUMAN HEALTH RISK ASSESSMENT EXPOSURE SCENARIOS
WALNUT CREEK PRIORITY DRAINAGE
OPERABLE UNIT 6
ROCKY FLATS PLANT**

GENERAL COMMENT

Some exposure pathways are identified as negligible, and risk via these pathways will not be evaluated. Pathways should be identified as complete or incomplete, and qualitative judgments should not be made. Certain pathways may only produce relatively negligible risk levels, but if a pathway is complete it should be evaluated in the risk assessment. Regulators have correctly stated in the past that all complete exposure pathways should be evaluated even if their contribution to overall risk is expected to be small. Also, which pathways pose the greatest risks to receptors is often a contaminant-specific principle and may not be best addressed for an entire operable unit (OU) composed of 21 Individual Hazardous Substance Sites.

SPECIFIC COMMENTS

- 1 Page (p) 2-2, Sect 2 0, second paragraph Colorado Department of Health (CDH) has criticized the use of local newspaper citations as the source of information regarding the future of Rocky Flats Plant (RFP), and it has opposed the statement that the Rocky Flats Local Impacts Initiative is attempting to attract businesses to make use of RFP buildings. As these statements or references to the article appear in this Technical Memorandum also, the same criticisms can be expected.
- 2 P 2-8, Sect 2 6, second paragraph The statement that no contaminant attributable vegetative stresses have been identified at RFP is supported by a Department of Energy, 1980 citation. The authors should provide more recent information.
- 3 P 4-8, Sect 4 6 1, second paragraph Unless the system is contaminant-limited, deposition of resuspended particles and their associated contaminants seems to present an additive pathway. The statement that deposition is a replacement rather than an addition, however, is made with regard to the on-site receptor where contamination is not likely to be limited. Therefore, receptors are seemingly exposed to both contaminants that have been taken up by plants and by deposited material.
- 4 P 4-9, Sect 4 6 3, first paragraph The description of the current on-site worker scenario does not distinguish whether it is a hypothetical situation.
- 5 P 4-11, Sect 4 6 4 It is unclear why the inhalation of volatiles indoors is included for the future on-site office/industrial worker when the discussion indicates a general absence of groundwater and that field screening of OU 6 soils has not detected contamination by volatiles. It should be noted, however, that p 4-7, first paragraph states that little or no contamination by volatile organic compounds has been found. This contradicts information reported on p 4-11. Please revise or clarify as necessary.

- 6 P 5-3, Sect 5 1 1, third bulleted statement The assumption of 30 working days for the construction-worker scenario is not conservative Many industrial construction projects last much longer, and because the land use issue for this area is not resolved, a more conservative assumption should be considered (e g , six months)
- 7 P 5-5, Sect 5 1 3, third bulleted statement The fraction ingested (FI) from the contaminated source is assumed to be 0 06 for the current on-site worker Although the exposure frequency for this scenario is 5 days/week for 50 weeks (Sect 5 1 1), justification should be provided for the 0 06 FI value CDH has commented in the past on this issue In addition, the exposure frequency for the future ecological researcher is limited to 4 days, 13 weeks per year for 2 5 years Therefore, it is reasonable to assume an FI of 1 for this receptor