

Meeting Minutes

Meeting Subject Phase I Baseline Risk Assessment Requirements for Operable Unit 7 (OU 7), Present Landfill, Phase I RFI/RI

Meeting Date August 19, 1992

Meeting Location Colorado Dept of Health (CDH) Offices, 4210 E 11th, Denver CO

Meeting Attendees

CDH
Harlan Ainscough
Joe Schieffelin
Carl Spreng

EG&G
Randy Ogg
Tim O'Rourke
Rick Roberts
Dennis Smith

DOE-RFO
Bob Birk

Issues and resolutions

- 1 Define the pathways to be addressed as part of the Phase I Human Health Risk Assessment (HHRA) Are the "downward" pathways part of the Phase I scope? For example, if the exposure scenario (see issue 2) includes consumption of water at the site, is the ground water pathway to be evaluated?

Resolution The "source" and unsaturated soils will be evaluated at the surface soil interface Only direct ingestion, inhalation of resuspended surface soils and possible volatilized contaminants, and dermal absorption pathways should be evaluated The method by which sources and soils are extrapolated to the surface still needs to be determined The pathways should be evaluated for direct exposure to a receptor

The source is defined as the primary source in the landfill, i.e. landfill contents only, not secondary sources such as leachate Groundwater and surface water pathways are specifically excluded from the Phase I HHRA analysis

- 2 Define the exposure scenarios to be addressed as part of the Phase I HHRA Should the exposure assumptions for OU 7 include the residential scenario?

Resolution It was the opinion of CDH that the exposure scenario bounding the risk calculations should be the residential scenario There was some discussion as to whether or not this scenario was valid for the landfill. EG&G risk assessment personnel felt that the residential exposure scenario was overly restrictive given the fact that clean closure for the landfill would not be likely The exposure scenarios used in the HHRA will be defined in the exposure scenario technical memorandum

- 3 How do the requirements for closure under Colorado Hazardous Waste Act (CHWA) and 40 CFR 265 Subpart G change the requirements for Phase I deliverables? Specifically, 40 CFR 265 111 (b) states that the closure performance standard minimizes to the extent necessary to protect human health and the environment post closure escape of hazardous constituents. The closure plan must cover final closure in accordance with 265 111. If the Phase I IM/IRA Decision Document constitutes a closure plan, how is compliance with the CHWA and 40 CFR attained, i.e. how do we demonstrate compliance with 40 CFR 265 111, given the current Phase I constraints for the HHRA as defined by the IAG?

Resolution CDH will consider full compliance with the CHWA closure requirements for operable units performing RCRA Facility Investigations only after the record of decision (ROD)