



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2405



Ref: 8HWM-FF

AUG 28 1991

Mr. Frazer Lockhart
U.S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, CO 80402-0928

Re: Selection Criteria for
Contaminants of Concern for
Human Health

Dear Mr. Lockhart:

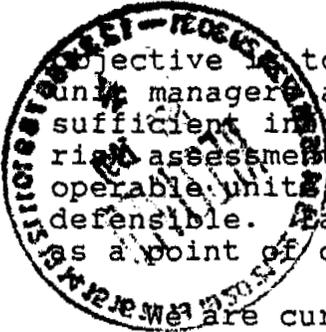
We received your letter of July 31, 1991, requesting written approval of the selection criteria for contaminants of concern (COCs) for human health risk assessments for the Rocky Flats Plant. However, we have a different understanding of the discussions which took place during the June 25, 1991, meeting of the Risk Assessment Technical Working Group.

We understood that the group's consensus on selection criteria and other risk related issues would be documented in meeting minutes prepared by the Department of Energy (DOE) and copies of handouts both of which would be routinely transmitted by DOE to attendees of the meetings. This is intentionally different from the formal review and comment procedure described in Section I.B.4 of the Interagency Agreement (IAG) Statement of Work. The IAG provides for formal review and comment by EPA and the Colorado Department of Health (CDH) on specific deliverables such as the various technical memoranda related to risk assessment and the operable unit (OU) workplans and Remedial Investigation/RCRA Facility Investigation reports, but does not provide a formal process for working groups such as the Risk Assessment Technical Working Group. However, the IAG provides DOE the option of preparing and submitting technical memoranda documenting items which the working group has reached consensus on. Such technical memoranda are subject to the review and approval procedures.

We believe that the intent of the working group is to foster technical exchanges on risk assessment issues and to strive for consensus on the approach to the complex risk assessment issues which we will face at Rocky Flats. It is imperative that the comments which are provided and the discussions which take place during the group's meetings be documented. The best means of this documentation is by preparing and transmitting minutes of the working group's meetings. If DOE requires a formal approval mechanism, we encourage you to transmit consensus items in the form of technical memoranda for EPA and CDH approval. The

ADMIN RECORD

A-SW-000446



objective is to create a record which will provide DOE's operable unit managers and EPA and CDH's project coordinators with sufficient information to ensure that workplans are developed and risk assessments are conducted consistently among the different operable units and in a such a way as to be technically defensible. Each agency's representative in the group can serve as a point of contact for further information.

We are currently preparing a charter for the group's consideration which will describe in greater detail the concept of maintaining meeting minutes and documenting key decisions through the use of technical memoranda. We plan to provide copies of the proposed charter for discussion at the next meeting of the Risk Assessment Technical Working Group.

Regarding your request for approval of the selection criteria for COCs which was transmitted to EPA and CDH for comment, the criteria is currently in outline form and does not contain sufficient information to allow its application to specific OU's. It does not reflect comments provided and discussions which took place during the June 25, 1991, meeting such as what references will be used to determine background concentrations and how persistence and biometabolic characteristics will be measured. We suggest that the details of the selection criteria be further developed and that a flow chart be prepared to clarify its application. The working group should review these changes at a future meeting and attempt to arrive at a consensus on the selection criteria. If DOE requires formal approval, a technical memorandum must be prepared and transmitted to EPA and CDH for approval. We also request that minutes of the June 25, 1991, meeting and other meetings of the working group be transmitted to the participants.

If you have any questions or would like to further discuss these issues, please contact Bonnie Lavelle at (303) 294-1067.

Sincerely,

Martin Hestmark, Manager
Rocky Flats Project

cc: Bruce Thatcher, DOE
Tom Greengard, EG&G
Dennis Smith, EG&G
Rick Roberts, EG&G
Gary Baughman, CDH
Norma Morin, CDH