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August 5, 1992



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

**RE: Technical Memorandum #6 to the Final Phase III RFI/RI Workplan
for OU 1: Exposure Scenarios, Revision 4.0, June, 1992**

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document submitted by DOE and prime operating contractor, EG&G. To avoid resubmission of this document, a response to the Division's comments, which are attached, should be incorporated into the Phase III RFI/RI Report.

If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 331-4421.

Sincerely,

Gary W. Baughman
Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division

cc: Martin Hestmark, EPA
Scott Grace, DOE
Farrel Hobbs, EG&G
Dennis Smith, EG&G
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ADMIN RECORD

A-OU01-000679



Colorado Department of Health

Review and Comment

Technical Memorandum #6 - Exposure Scenarios

OU 1 - 881 Hillside

June, 1992

General Comments:

1) A remaining basic problem included in this TM is the lack of consideration of a direct exposure to ground water. We continue to believe that there are many technical reasons why ground water should be considered in the baseline risk assessment (BRA) even after the installation of the French Drain. This is particularly true since the BRA must assess baseline conditions, assuming no further action. However, as we stated in our original comments to the draft version of this document, direct exposure to ground water must be considered per Federal Register, Volume 52, Number 53, Thursday, March 19, 1987, pp. 8704-8709. Therefore, the Division expects a ground water exposure scenario to be incorporated into the quantitative treatment already being given to other aspects of the future on-site residential use scenario. (NOTE: The Federal Register noted above is specifically listed in IAG Attachment 2 (Statement of Work), Section I.A.)

Specific Comments:

Section 1.1: The quote of Attachment 2, Section VII.D.1.b of the IAG is incorrect. The correct version of the quoted text is "the present, future, potential and reasonable use exposure scenarios with a description of the assumptions made and the use of the data."

Figure 5-1: As mentioned in General Comment 1 above, a pathway needs to be added to this figure which goes directly from the "Alluvial Ground Water" box to an ingestion exposure.

Table 5-3: In order to judge the adequacy of the parameters listed on this table, the Division needs to understand which parameters will be used in each scenario specific intake equation. Please provide the equations, the parameters associated with each, and an explanation of the parameter source or parameter calculation when appropriate in the Phase III RFI/RI Report.