

0742 RF 93

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ACTION

DIST. LTR ENC

BENEDETTI, R.L.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
BENJAMIN, A.		
BERMAN, H.S.		
CARNIVAL, G.J.		
CORDOVA, R.C.		
CROUCHER, D.W.		
DAVIS, J.G.		
FERRERA, D.W.		
HANNI, B.J.		
HEALY, T.J.		
HEDAHL, T.G.		
HILBIG, J.G.		
IDEKER, E.H.		
KIRBY, W.A.		
KUESTER, A.W.		
LEE, E.M.		
MANN, H.P.		
MARX, G.E.		
McKENNA, F.G.		
MORGAN, R.V.		
PIZZUTO, V.M.		
POTTER, G.L.		
RILEY, J.H.		
SANDLIN, N.B.		
SATTERWHITE, D.G.		
SCHUBERT, A.L.		
SETLOCK, G.H.		
SHEPLER, R.L.		
SULLIVAN, M.T.		
SWANSON, E.R.		
WILKINSON, R.B.		
WILSON, J.M.		
ZANE, J.O.		

*Arndt M*

*Taylor K*    
*adh Rec*

CORRES CONTROL    
TRAFFIC

Reviewed for Addressee  
Corres. Control RFP

21693 *[Signature]*  
DATE BY

Ref Ltr. #

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2466



FEB 11 1993  
FEB 11 1993

EG&G  
ROCKY FLATS PLANT  
CORRESPONDENCE CONTROL

FEB 16 11 26 AM '93

Ref: 8HWM-FF

Mr. Richard Schassburger  
Department of Energy  
Rocky Flats Office  
P.O. Box 928  
Golden, CO 80402-0928

re: OU 2 Tech Memo #5

Dear Mr. Schassburger:

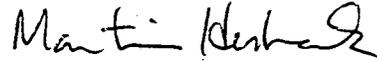
EPA has completed review of the referenced document. Comments prepared by our toxicologist, Dr. Griffin, and by our technical review contractor are attached. In general, the issues raised point to a consistent pattern of making exposure assumptions and selecting intake parameters which understate potential risk. Under CERCLA, a more conservative approach is required. I would also like to add the following:

1. The document states (pg. 2-11) that a number of seeps in OU 2 are "currently being remediated". This is not true.
2. Numerous statements are made about "future designation as an ecological preserve" (e.g. pg. 2-13). They are speculative, misleading, and largely irrelevant.
3. In constructing the Conceptual Site Model (pg. 4-6), the document asserts that there is no contamination in the lower hydro-stratigraphic unit. This conclusion is premature.
4. The document repeatedly states that the RFP Surface Water Management Plan was approved by EPA. This plan was not subject to nor did it receive Agency approval.

All issues raised here, and those raised by CDH in separate correspondence, must be resolved to the satisfaction of all parties before proceeding with subsequent stages of the risk assessment if future problems are to be avoided.

We will continue to work with Mr. Scott Grace of your staff to expeditiously resolve the concerns raised in these comments, in order that the risk assessment process can proceed. If you have questions or would like to discuss the progress of this effort, please contact Bill Fraser (EPA) at 294-1081.

Sincerely,



Martin Hestmark, EPA  
Manager  
Rocky Flats Project

cc: w\attachment  
Scott Grace, DOE  
Joe Schieffelin, CDH  
R.L. Benedetti, EG&G