



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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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 #6

Dear Mr. Schassburger:

EPA has completed review of the referenced document. Comments prepared by our technical review contractor are attached. In general, the issues raised involve clarification of the capabilities of the models selected and do not question the basic approach you have recommended.

Reevaluation of the models being used, and the uses they are put to, may be appropriate as more analytical data becomes available. I am particularly concerned that we avoid undertaking expensive and time consuming modeling efforts if they are not necessary to support the decision process. If it becomes evident that the data will not support a particular effort, or the questions it was designed to answer can be set aside, we should reexamine the scope of this effort as set forth in Tech Memo #6. Modeling that does not further the decision process is an unproductive academic exercise.

I would also like to add that the discussion of the conceptual model and the exposure scenarios presented here will have to be updated based on the resolution of comments on Tech Memo #5. Also, several comments were previously made concerning the soil gas model and the air exchange rates and assumed distance to groundwater as applied in OU 1. These items should be reevaluated for OU 2, in light of those comments.

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.

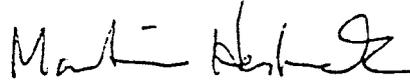
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ADMIN RECORD

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