



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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

MAY 15 1991

Ref: 8HWM-FF

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

Re: Preliminary Health Risk  
Assessment - OU 3

Dear Mr. Lockhart:

EPA and CDH have reviewed the final Historical Information and Preliminary Health Risk Assessment Report (HIPHAR) for Operable Unit 3. Although the document has been revised substantially in response to comments on the draft version, there are a number of comments which have not been addressed adequately. The comments from EPA, and the Colorado Department of Health (CDH) are enclosed (enclosures 1 & 2). In addition, EPA will forward comments to DOE, generated as a result of our toxicologist's review, as soon as these comments are drafted. EPA cannot approve the Historical Information and Preliminary Health Risk Assessment Report until revisions are made to this report which address the enclosed comments to the satisfaction of EPA Region VIII. Our major concerns can be summarized as follows:

1. DOE must recognize in the report, that contamination has not been adequately characterized at OU 3 and that EPA will require the OU 3 Remedial Investigation Workplan to address additional contaminants. AS a result of discussions with DOE on this issue, EPA understands that DOE plans to forward a draft Remedial Investigation Workplan for OU 3 which will address contaminants in addition to plutonium which are radioactive and non-radioactive. It is premature and presently unsupported to conclude within the Historical Information and Preliminary Health Risk Assessment Report that these additional contaminants have already been determined to result in no risk. Statements of this nature lead the reader to believe that no additional investigation is necessary. EPA believes that there is insufficient evidence to support such a conclusion and we are concerned that this document appears to be inconsistent with recent discussions regarding the OU 3 Remedial Investigation Workplan.

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ADMIN RECORD

2. The conceptual model needs to be revised as indicated in the enclosed comments. EPA considers the model to be fundamental to the development of the Remedial Investigation Workplan and therefore, we cannot accept this HIPHAR until the corrections are made.
3. The Generic Risk Assessment is incorrect due to lack of consideration of soil ingestion and particulate inhalation in the residential land use scenario.

Please make the necessary corrections to the report and resubmit applicable sections for an approval determination by EPA no later than June 15, 1991. If you have any questions or require clarification of any of the enclosed comments, please call Mr. Joe Schieffelin of CDH at (303) 331-4421 or Ms. Bonita Lavelle of EPA at (303) 294-1165.

Sincerely,



Martin Hestmark  
Rocky Flats Team Leader

Enclosure

cc: Gary Baughman, CDH  
Barbara Barry, CDH  
Joe Schieffelin, CDH  
Robert Birk, DOE  
Michael Guillamme, EG&G