





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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

JUN 30 1993

Ref: 8HWM-FF

Dave Kaunisto  
City of Westminster  
4800 West 92nd Avenue  
Westminster, CO 80030

Dear Mr. Kaunisto:

Enclosed please find copies of technical review comments on the Human Health Risk Assessment and Fugitive Dust Dispersion Modeling for the Standley Lake Diversion Project and the Field Activities Report, Air Dispersion Modeling and Risk Assessment Memorandum. Although the project has evolved since these documents were drafted, we forward these comments to provide the cities with feed back which may prove useful in developing the risk assessments for the final system configuration.

Comments directed to specific components of the SLPP which are no longer under consideration may still prove useful but more than likely will not necessitate a revision in the risk assessment. In general, the risk assessment as drafted needs to be revised to assess environmental risk. Additionally there are problems with the conceptual exposure model, the omission of environmental media and the selection of chemicals of concern.

An operations plan must be defined to understand what risks will occur upon routine operation and upon capture of contamination. In the event contamination above acceptable levels is captured, and the Standley Lake Protection Project is operated as an IM/IRA under the IAG, then for the purposes of CERCLA, the operational plan for this situation can be deferred until definition of an IM/IRA. However, this same information may be required by the Fish and Wildlife Service as part of the Section 7 consult under the Endangered Species Act.

If you have any questions regarding these comments, please contact me at (303) 294-1134.

Sincerely,

A handwritten signature in black ink, appearing to read "Martin Hestmark".

Martin Hestmark, Manager  
Rocky Flats Project

cc:

Gary Baughman, CDH  
Steve Tarlton, CDH-RFPU  
Mark Vanderpuy, DOE  
Rich Schassburger, DOE