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DOE/RFO
CORRESPONDENCE
INCOMING LETTER

94 DOE 04143

Hill
ACTION 4/7/94

DUE DATE

SILVERMAN, M.N.	
PAHLE, A.H.	
BROCKMAN, D.A.	
BUTLER, B.A.	
CANNON, G.B.	
HARTMAN, J.K.	
BRAINARD-JORDAN, B.	
KARDL, M.S.	
LEWIS, L.	
LINDSAY, D.	
McBRIDE, M.	
ROBERSON, J.M.	X
RUSCHITTO, D.	
SARGENT, D.W.	
SIMONSON, D.P.	
SMITH, L.W.	
ADAMS, J.	
ANDERSON, T.W.	
COTE, P.	
CRAUN, R.	
DUFFY, G.G.	
GRETHEL, T.	
HARGREAVES, M.	
HICKS, D.A.	
HOFFMAN, R.	
LEVERNIER, R.	
LOCKHART, E.R.	X
LOPEZ, A.	
MALCHESIO, D.	
MCCORMICK, M.S.	
MILLER, H.G.	
NISHIMOTO, G.	
OLINGER, S.	X
PIETSCH, E.	
RAMPE, J.	
RASK, W.C.	
REECE, R.	
SCHASSBURGER, R.	X
SELAN, J.	
STEWART, J.	
WALLIN, E.	
HILL	X X
CRATCHER	X X
WARD	X X
BURKE	X X
DOE RECORDS	X X

NOTE: _____

RECEIVED FOR ADDRESSEE

BY: _____ DATE: _____

ME 3/24/94

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2468

MAR 22 1994 MAR 24 AM 8 26

Ref: 8HWM-FF

Ms. Shirley Olinger
Assistant Manager for Environment, Safety,
and Health
Rocky Flats Office
U.S. Department of Energy
P.O. Box 928
Golden, Colorado 80402-0928

ADMIN RECORD

Re: Resolution of the Data Aggregation
Dispute at the Rocky Flats Plant

Dear Ms. Olinger:

I am writing as the EPA Dispute Resolution Committee (DRC) representative to forward a proposed resolution of the dispute concerning data aggregation for the purpose of conducting a human health exposure assessment at the Rocky Flats Plant. I believe the enclosed proposal is a workable compromise between the positions of EPA and the Department of Energy (DOE) as presented at the March 3, 1994, meeting of the DRC.

From the March 3, 1994, meeting, I understood that DOE's position was to aggregate data within areas defined by the distribution of contamination, i.e., by source areas. This proposal differs from that position in that it includes the consideration of "exposure areas" over the defined source areas with the stipulation that in general, only the exposure area associated with the highest potential risk needs to be quantitatively evaluated in the baseline risk assessment. It also incorporates the "conservative screen" in order to ensure compliance with the Resource Conservation and Recovery Act and the Colorado Hazardous Waste Act.

EPA believes that the enclosed method of data aggregation deviates from the Risk Assessment Guidance for Superfund but represents a more conservative approach than required by that guidance. I remain concerned that the development of remediation goals across the Rocky Flats site based on the risks associated with only the most conservative exposure areas may lead to overly costly remedial alternatives. It is likely that additional data collection will be required as a part of the feasibility studies/corrective measures studies in order to refine and focus remedial alternatives. Nevertheless, I am willing to proceed in accordance with the enclosed approach.

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MKS
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I formally request your concurrence on the implementation of the enclosed approach and the resumption of all baseline risk assessment work at operable units 2 through 7 at the Rocky Flats Plant. Please indicate your concurrence by signing the signature line below and returning a copy of the signed letter. All affected work will resume immediately upon concurrence with this letter by yourself and upon concurrence by Joan Sowinski (Colorado Department of Health) to a similar letter which I am sending separately.

DOE must evaluate the impacts of the work stoppage and the implementation of the proposed data aggregation methodology on the affected operable unit schedules and submit these to EPA and the Colorado Department of Health for approval pursuant to Part 42 of the Interagency Agreement. Please forward this information to both agencies no later than three weeks from the receipt of this letter.

If you have any remaining questions or concerns, please don't hesitate to call me.

Sincerely,



Robert L. Dunsley, Director
Hazardous Waste Management Division

CONCURRENCE:

Shirley Olinger
Assistant Manager for Environment, Safety,
and Health
Rocky Flats Plant
U.S. Department of Energy

Enclosure

cc: Joan Sowinski, CDH
Martin Hestmark, EPA
Richard Schassburger, DOE
Gary Baughman, CDE
Joe Schieffelin, CDH
Bruce Thatcher, DOE
Bonita Lavelle, EPA