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CORRESPONDENCE CONTROL NO.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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

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EC&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

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DATE

ACTION

NAME	IST	LTR	ENC
NEDETTI, R.L.			
WJAMIN, A.			
FRMAN, H.S.			
BRIVALL, G.J.			
PP, R.D.			
RODOVA, R.C.			
VIS, J.G.			
FRERA, D.W.			
ANZ, W.A.			
NNI, B.J.			
ALY, T.J.			
DAHL, T.G.			
BIG, J.G.			
TCHINS, N.M.	X	X	
BY, W.A.			
ESTER, A.W.			
HAFFEY, J.W.			
NN, H.P.			
RX, G.E.			
KENNA, F.G.			
RGAN, R.V.			
ZUTO, V.M.			
FTER, G.L.			
NOLIN, N.B.			
FTERWHITE, D.G.			
HUBERT, A.L.			
TLOCK, G.H.			
LIVAN, M.T.			
ANSON, E.R.			
KINSON, R.B.			
SON, J.M.			

Ref: 8HWM-FF

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

Re: Technical Memorandum 12, Human
Health Risk Assessment Exposure
Scenarios, Operable Unit 5

Dear Mr. Schassburger:

EPA has reviewed the above referenced document. The enclosed review comments (enclosure 1) and those submitted by the Colorado Department of Health under separate cover must be addressed to the satisfaction of EPA, the lead regulatory agency. An option for addressing these comments is to submit adequate documentation of specific changes which will be incorporated into the baseline risk assessment for Operable Unit 5 (OU 5). This will eliminate the need for re-submittal of Technical Memorandum 12 (TM 12).

We believe that a comprehensive analysis of land use at Rocky Flats is needed to provide a basis for the exposure scenarios outlined in this TM and to ensure consistency in similar TMs submitted for other OUs at the site. For example, the exposure scenario TM for OU 3, the off site areas, does not consider agricultural use as a current use scenario, yet agricultural use is identified in TM 12 for OU 5 as a current off site exposure scenario. Also, arguments concerning the likelihood of exposure scenarios occurring are insupportable without such land use analysis. Although this is admittedly a broader issue than OU 5, if done correctly, the land use analysis will add defensibility to TM 12. Therefore, it is imperative that the work necessary to define the reasonable maximum exposure scenario begin as soon as possible. Please submit details of the Department of Energy's plans for accomplishing such an analysis, including a schedule.

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Reviewed for Addressee
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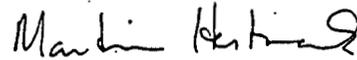
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ADMIN RECORD

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If you have any questions or require clarification of any of the enclosed comments, please contact Bonnie Lavelle, (303)294-1067.

Sincerely,



Martin Hestmark, Manager
Rocky Flats Project

Enclosures

cc: Joe Schieffelin, CDH
Jen Pepe, DOE
Ed Mast, EG&G