

NOV 29 1993

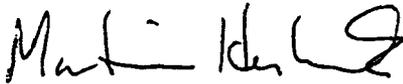
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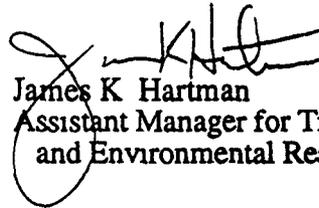
Therefore we ask for your support in reactivating the CRA Forum to resume completion of the Human Health Risk Assessment (HHRA) template that had been initiated in the latter scoping meetings conducted during the May 11 June 3 1993 time period We further ask for your support in completing the Ecological Risk Assessment (ERA) template The HHRA and the ERA have complementary and overlapping fate and transport elements

Lastly please find enclosed responses to the concerns expressed in your letter Please review our responses to these items and respond in writing to EPA and DOE/RFO by December 23 1993 as to whether or not your concerns are adequately addressed and whether CDH agrees with the revised scope of the CRA DOE/RFO may then proceed to address FY 94 CRA funding Further delays to the CRA may result in the inability to produce and integrate the CRA within IAG time frames for the FS/CMS at OUs 1 2 3 5 and 6 If DOE/RFO EPA and CDH are to select remedies protective of human health and the environment that are both fiscally and scientifically defensible the CRA must immediately proceed

Sincerely



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Enclosure

cc w/Enclosure
R Schassburger ERD RFO
B Thatcher ERD RFO
A Howard EPD RFO
N Hutchins EG&G
W Busby EG&G
R Roberts EG&G
F Harrington EG&G
B Ramsey SMS
B Lavelle EPA
M Hestmark EPA
J Schieffelin CDH
J Love CDH
R Stewart DOI
R Cattany CDNR

RESPONSES TO CDH CONCERNS EXPRESSED IN AUGUST 30 1993 LETTER

Concern 1 Use of historical and current plant operations information to estimate worker exposure

Response We propose to utilize historical and plant operations information only to the extent that air dispersion modeling results are benchmarked We will answer the question what are the exposure calculations for air relative to actual measured data? and discuss the differences in the uncertainty analysis This will require an evaluation of the useability of the historical and current plant operations data which will be explicitly stated in the CRA However data agreed to be not useable by RFO EPA and CDH will not be used

The DOE has a responsibility to consider risks at the RFP that currently fall outside of the IAG (i.e. building emissions) However these additional sources of risk will not be considered in the CRA

Concern 2 Finalize OU specific risk assessment methodology prior to structuring the CRA CRA HHRA must be composed of the individual OU HHRAs

Response Since the CRA will be a living document incorporating the results of OU specific RFI/RI Reports which include Baseline Risk Assessments and since the CRA will identify data gaps and redundancies in OU specific RFI/RI's the CRA and OU specific risk assessments are linked by feedback loops Since the spatial scale at which the CRA is to be performed is much larger than a single OU it will not be appropriate to merely roll up the OU specific risk assessments into a CRA We propose to define the methodology for the OU specific risk assessments concurrently with the CRA

During the scoping meetings there was consensus that the CRA was fundamentally different from the OU specific risk assessments since it considers all source terms and routes of exposure We do not believe that it is viable to simply add up the human health risks calculated in the OU specific risk assessments to get sitewide risk.

OU specific risk assessments are limited to contaminants within the OU There is no agreement among project managers as to the methodology to be followed in the OUs and no forum outside the CRA Forum which has dealt with the consistency issues Therefore we consider the CRA to be the essential framework for answering consistency and defensibility of the OU specific risk assessments

Concern 3 The CRA usage by the SWEIS and IPP

The U S Department of Energy (DOE) cannot properly and safely manage the RFP without considering all actual and potential sources of risk to human health and the environment. In fact, DOE is required by statute regulations and DOE Orders to consider risk to workers the public and the environment beyond the extent specified in the IAG If the CRA is not performed under the IAG it must be performed in concert with the SWEIS and the IPP CDH would have much less influence on the CRA than under the IAG

There is also a redundancy issue. It would be irresponsible for efforts similar to the CRA to proceed independently under the SWEIS and IPP. We believe that the IAG is the appropriate location to deal with the risk posed by contaminants in the environment under CERCLA, RCRA and CHWA. In this way, CRA results can be incorporated into the SWEIS and IPP without having to worry about the consistency and comparability of the risk assessments. Note, however, that coordination with the SWEIS and IPP risk assessment teams will be required.

- Concern 4: Do not concur on the initial year future use buffer zone exposure scenario
- Response: We propose to include a future residential scenario in the RFP buffer zone in the initial year CRA.
- Concern 5: Work scope associated with data management, data interpretation, source characterization, release mechanism interpretation, and fate/transport estimation is potentially unnecessary. Only off-site human receptors need assessment on a sitewide basis.
- Response: The ERA, which DOE/RFO, EPA and CDH agree is necessary, must be built on source term, release, transport and fate processes.

Also, since the spatial scale of the CRA is significantly different than that for OU specific risk assessments, preparing the CRA will not be a simple matter of taking the OU specific risk assessments and rolling them up in a CRA. This is particularly true for the COC selection process. As a result, all of the listed work scope will need to be revisited for the CRA when incorporating the results of OU RFI/RI Reports. We disagree that off-site receptors are the only receptors of interest for the CRA. Given the current uncertainty of future land use at the RFP, we believe it would be a major mistake to ignore potential on-site receptors. We propose to address data interpretation, source characterization, release mechanism interpretation, and fate/transport estimation for both the CRA and OU specific risk assessments during the HHRA and ERA template preparation.

With regard to data management, please see paragraph four of the cover letter. Note that this element is of such critical importance to the CRA that it was addressed at this location.