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CORRES. CONTROL
INCOMING LTR NO.

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STATE OF COLORADO

DUPLICATE
DATE

Roy Romer, Governor
Patricia A. Nolan, MD, MPH, Executive Director
Dedicated to protecting and improving the health and environment of the people of Colorado

Nov 28 2 31 PM '94



ACTION

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION
4300 Cherry Creek Dr. S. 222 S. 6th Street, Room 232
Denver, Colorado 80222-1530 Grand Junction, Colorado 81501-2768
Phone (303) 692-3300 Phone (303) 248-7164
Fax (303) 759-5355 Fax (303) 248-7198

EG&C
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

Colorado Department
of Public Health
and Environment

DIST.	LTR	ENC
BURLINGAME, A.H.		
BUSBY, W.S.		
CARNIVAL, G.J.		
CORDOVA, R.C.		
DAVIS, J.G.		
FERRERA, D.W.		
FRAY, R.E.		
GEIS, J.A.		
GLOVER, W.S.		
GOLAN, P.M.		
GIANNI, B.J.		
JEALY, T.J.		
JEDAH, T.G.		
JILBIG, J.G.		
JUTCHINS, N.M.		
JACKSON, D.T.		
JELL, R.E.		
JUESTER, A.W.		
JARX, G.E.		
McDONALD, M.M.		
McKENNA, F.G.		
MORGAN, R.V.		
MIZZUTO, V.M.		
MOTTER, G.L.		
MANDLIN, N.B.		
MATTERWHITE, D.G.		
CHUBERT, A.L.		
CHWARTZ, J.K.		
ETLOCK, G.H.		
TIGER, S.G.		
OBIN, P.M.		
COORHEIS, G.M.		
WILSON, J.M.		
ROBERTS, RS.	X	
HOLLOWELL	L	X

November 15, 1994

Mr. Steven W. Slaten
U. S. Department of Energy
Rocky Flats Office, Bldg 116
P.O. Box 928
Golden, Colorado 80402-0928

RE: Programmatic Preliminary Remediation Goals (PPRGs), October, 1994

Dear Mr. Slaten,

The Colorado Department of Public Health and the Environment, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document submitted by DOE and prime operating contractor, EG&G.

The Division notes that comment #3 from our September 9, 1994, correspondence (Joe Schieffelin to Steve Slaten) regarding the draft PPRGs has not been addressed. Considering exposure to children as a sensitive subpopulation is crucial to the Division and, therefore, based on your response to comment #3, we hereby disapprove this document. In addition, comments #4 and #5 were adequately addressed in the comment responses, but appropriate changes were not made to the document.

DOE understood how the Programmatic PRGs were to be calculated when the risk assessment work stoppage was resolved in April, 1994. Nevertheless, the draft PPRGs were submitted in July, 1994 in defiance of our previous agreements. We pointed this out in our September 9, 1994 comments. Now, the "final" PPRGs have been submitted which, once again, ignore our requirements. The result is that DOE has wasted seven months preparing inadequate PRGs. The extent to which these seven months impact successful and timely completion of IAG milestones will remain DOE's responsibility.

CORRES. CONTROL	X	X
DMN RECORD/080		
ATS/T130G		

Reviewed for Addressee
Corres. Control RFP

11-29-94
DATE BY

Ref Ltr. #

DOE ORDER # 5400.1

ADMIN RECCRD

SW-A-003781

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To achieve Division approval of the Programmatic PRGs, the following requirements must be met:

- 1) The PRGs must be calculated considering residential childhood exposure in each pathway and for all media.
- 2) Table 1 in the document, and appropriate text, must be modified to reflect DOE's response to our 9/9/94 comment #4 regarding use of PRGs in subsurface soil exposure calculations. DOE's response to our comment indicates that DOE is willing to assess residential exposure to subsurface soils. If so, residential exposure to subsurface soil should not be "Not Applicable" on Table 1.
- 3) The document must be revised to include DOE's response to our 9/9/94 comment #5.

If you have any questions regarding these matters, please call me at 692-3356.

Sincerely,



Joe Schieffelin, Unit Leader
Rocky Flats IAG Unit
Hazardous Waste Control Program

cc: Martin Hestmark, EPA
Norma Casteneda, DOE
Rick Roberts, EG&G
Dan Miller, AGO
Steve Tarlton, CDPHE-OE