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Permits

OCT 20 1993

Mr. Theodore Taylor  
Program Manager  
Environmental Restoration Program  
Department of Energy  
Los Alamos Area Office  
Los Alamos, New Mexico 87544

Re: Installation Work Plan Risk Assessment  
Los Alamos National Laboratory  
NM0890010515

Dear Mr. Taylor:

Enclosed is a list of comments and questions on the Technical Assumptions for Data Collection and Evaluation for the Los Alamos and Sandia National Laboratories, as well as, some guidance documents supplied by our risk assessment specialist, Jon Rauscher. Los Alamos shall provide a response to all questions within thirty (30) days of receipt of this letter.

Should you have any questions, please contact Barbara Driscoll at (214) 655-7441.

Sincerely,

William K. Honker, P.E.  
Chief  
RCRA Permits Branch (6H-P)

Enclosure

cc: Benito Garcia, NMED

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**Comments on the Technical Assumptions for Data Collection and Evaluation for the Los Alamos and Sandia National Laboratories**

**General comment:**

EPA risk assessments are required to consider a central tendency (or average) exposure and a "high end" exposure (Habicht, 1992). The Reasonable Maximum Exposure (RME) is considered to be a "high end" exposure (Longest and Diamond, 1992). The long-term worker and residential exposure scenarios have exposure information that would allow for the development of a central tendency exposure and RME scenarios (Rauscher, 1992).

**Specific comments:**

Table 1, General Exposure Parameters, Area of Exposure Unit (Aeu): More explanation is requested on the basis of the values selected for the Exposure Unit Areas.

Table 1, General Exposure Parameters, Indoor Shielding Factor for Gamma (SF): More explanation is requested concerning the Indoor Shielding Factor for Gamma of 70%. Gamma radiation does have a high penetration ability.

Table 1, Inhalation Pathway, Particulate Concentration in Air: The particulate concentrations proposed in the document are extremely high concentrations. For example, the National Ambient Air Quality Standard for particulate matter is 1.5  $\mu\text{g}/\text{cu. m.}$  The particulate concentrations proposed are likely to overestimate the expected exposure concentration of particulates.

Table 1, Ingestion Rates: The long-term and construction worker scenarios do not have a consumptive use of ground water. The EPA Standard Default Exposure Parameters (US EPA, 1991) allows for a consumptive use of 1 liter per day (1 liter out of 2 liter normally used) for an individual's water consumption at work.

Table 1, Soil Dermal Contact Pathway: The long-term worker has no dermal contact with soil. What is the basis for the long-term worker not having any dermal contact with soil?

Table 1, Groundwater Dermal Contact Pathway: The long-term worker has no dermal contact with groundwater. What is the basis for the long-term worker not having any dermal contact with groundwater?