EPA Appendix F - Risk Assessment # 37

Comment:

Section 10.3: This section needs to better explain and justify the decision made here to ignore nonradiological carcinogenic risks and all noncarcinogenic risks for the off-site disposal remedy. This remedy will involve very different exposure factors and pathways than those currently existing at the site, which could result in significantly different risks than those calculated in the baseline risk assessment.

Discussion:

The previous draft of the risk assessment did not include chemical risks and hazard indices because the BRA found them to be a very minor contributor to human health effects in the no-action alternative, and it was felt that the additional time and expense associated with including them would provide little information to decision makers. In response to this and other comments, health effects from non-radiological constituents have been evaluated alongside the short-term radiological risks. As anticipated, the calculated risks to receptors from non-radiological constituents in the current draft of Appendix F are a small fraction of the total calculated short-term human health risk for any alternative. Hazard indices for the three alternatives are well below 1.0.

Proposed Text Change:

The proposed changes to the risk assessment text and tables have been incorporated into the current draft of Appendix F. Sections 9-12 of Appendix F are currently being revised as updated information on schedules, material handling processes and transportation requirements become available.

EPA FEEDBACK:

EPA generally accepts this response; however, we will need to review the final SFS report to ensure that this issue was fully addressed.