

5/14/99 - 02267

OPTIONAL FORM 99 (7-90)

**FAX TRANSMITTAL**

# of pages ▶ 12

To	Andrea Hunstod	From	K Buchi
Dept./Agency		Phone #	410 436 4929
Fax #		Fax #	410 436 4996

ATSDR/OHAC/OD

1999 MAY 19 PM 12:50

NSN 7540-01-317-7368

5099-101

GENERAL SERVICES ADMINISTRATION

14-May-99

Assistant Administrator, ATSDR (CHB)  
 1600 Clifton Road, NE (E28)  
 Atlanta, GA 30333

**Petition for Public Health Assessment**

On this 14<sup>th</sup> day of May, 1999, the undersigned hereby formally petitions the Agency for Toxic Substances and Disease Registry (ATSDR) of the United States Public Health Service to undertake an investigation and assessment of a clear, immediate and profound risk to the health of the 9400 inhabitants of Isla de Vieques, Puerto Rico.

The entire at risk population is subjected to toxic chemicals resulting from the detonation, deflagration and decomposition of military ordnance only ten miles from the inhabited area. The site (N18° 08' x W 65° 17') has received thousands of tons of Tetryl, RDX and HMX, over the past fifty years, as well as unknown military ordnance agents. Exposure occurs by the pathways and mechanisms suggested in the ATSDR Toxicological Profiles for the above named agents.

The daily disturbance of the grossly contaminated soils in the impact area, by the explosion of live bombs, missiles and shells, produces immense dust clouds which are carried by the prevailing winds to the populated area, less than ten miles downwind. Completed exposure pathways include inhalation of dusts, ingestion of dusts and ingestion of contaminated ground water and rain water used as an emergency water supply.

The immediacy of the health risk and the need for immediate preliminary action cannot be stressed enough.

I and other health professionals of Vieques stand ready to cooperate with and assist ATSDR in every possible manner.

This is in response to your recent letter to the Assistant Administrator, Agency for Toxic Substances and Disease Registry (ATSDR). ATSDR will consider it to be a petition for a public health assessment, as authorized under the Comprehensive Environmental Response, Compensation, and Liability Act (also known as Superfund). **We** have enclosed information that describes how ATSDR considers petitions and that defines some of the terms we use.

Your letter described concerns about environmental contamination as a result of military ordnance on Isla de Vieques, Puerto Rico. We understand your health concerns to include the following:

- You believe that chemicals may **be** carried in the air to a populated *area* via dust clouds from explosions of **bombs**, missiles, and shells.
- You believe that people **may** ingest or inhale contaminated dust via air, groundwater, and rain water.

ATSDR staff will begin a review of information about the Isla de Vieques and the health concerns described in your letter. **As** necessary, we also will review information available about the site from the U.S. Environmental Protection Agency (EPA), U.S.

Department of Defense, Commonwealth health and environmental agencies, and local sources. We will look for potential threats to public health and consider the community's health concerns about the site.

Once ATSDR has completed the initial evaluation of your petition, we will notify you regarding our findings and any plans to respond to the community's concerns.

Thank you for referring your concerns to ATSDR. Our staff welcomes discussion with you and other concerned community members in the area. We also want to continue to keep you informed of ATSDR's work on these concerns. If you have questions about our proposed plan of action, your staff may contact Mr. Arthur Block, ATSDR Senior Representative, Region II in New York, at telephone (212) 637-4307, or Mr. John Steward, ATSDR Petition Coordinator, at telephone (404) 639-0610. Community members may also contact ATSDR by calling our toll-free telephone number, 1-888-42ATSDR (1-888-422-8737).

Sincerely yours,

Robert C. Williams, P.E., DEE  
Director, Division of Health Assessment and  
Consultation (DHAC)

Enclosures (including "Expectations")

bc: Arthur Block, Region 2  
EICB

## PETITIONED PUBLIC HEALTH ASSESSMENTS

### **Why does ATSDR conduct public health assessments?**

ATSDR's highest priority is the protection of public health. Conducting public health assessments allows ATSDR to identify and evaluate locations where public health actions should be taken.

### **Who may petition ATSDR to conduct a public health assessment?**

Anyone -- an individual (e.g., a physician or concerned resident) or group -- may petition ATSDR to conduct a public health assessment of a site or release of hazardous substances.

### **What happens when ATSDR receives a petition?**

After ATSDR acknowledges the petition (by letter), we begin to identify possible sources of information about the site or release. From the information identified, we decide whether ATSDR should conduct additional activities to **assess** the likelihood that a health threat may exist or to examine the concerns in *greater* depth.

### **What does ATSDR consider when making its decision about a petition?**

Decisions are based on the following criteria: 1) Has ATSDR already prepared a public health assessment that addresses the concerns stated in the petition? 2) Has there been a release into the environment? 3) Is a public health assessment the most appropriate response? 4) What are the location, concentration, and toxicity of the hazardous substance or substances that may be present? 5) Is there an exposed or potentially exposed population? and 6) Is there a plausible link between exposures and community health concerns or any health effects that may exist?

### **Where does ATSDR find the information used for the evaluation?**

ATSDR reviews existing environmental and health outcome information (e.g., from other federal and state and local agencies) regarding the site or probable source of release. ATSDR does not conduct environmental sampling or begin health studies when it evaluates a petition.

### **Does ATSDR meet with the petitioner and the concerned public?**

ATSDR first calls the petitioner on the telephone. If the petition meets criteria 1, 2, and 3 (described above), a meeting is usually set up to discuss site concerns with the petitioners and others who may have health concerns or other information.

### **Do all petitions result in a public health assessment?**

No. ATSDR determines the most appropriate response to the petition. When the petition evaluation is completed, ATSDR sends the petitioner a letter explaining what ATSDR intends to do (e.g., a public health assessment, a public health advisory, health consultation, or another activity). If ATSDR decides to conduct a public health assessment, ATSDR provides the petitioner an estimated completion date. When conducting further activities is not appropriate for ATSDR, the petitioner receives a letter describing why the petition needs no further action.

2/5/93

## TERMS OFTEN USED

### **Environmental Data**

Environmental *data* include information on environmental contamination and environmental pathways provided in site-specific reports.

### **Health Consultation**

A health consultation is a written or verbal response from ATSDR to a site-specific request for information about health risks related to a specific site, chemical release, or hazardous material.

### **Health Outcome Data**

Health outcome data are a main kind of data for public health assessments. The identification, review, and evaluation of health outcome parameters are interactive processes involving the health assessors, data source generators, and the local community. Health outcome data are community specific and may be derived from databases at the local, state, and national levels, as well as from data collected by private health care organizations and professional institutions and associations. Databases to be considered include morbidity and mortality data, birth statistics, medical records, tumor and disease registries, surveillance data, and previously conducted health studies.

### **Health Study**

A health study is an investigation of exposed individuals designed to help in identifying exposure or effects on public health. Health studies also define health problems that require further inquiry using a variety of study types, including health surveillance or an epidemiologic study.

### **Public Health Assessment**

A public health assessment is the evaluation of data and information on the release of hazardous substances into the environment to assess any current or future effect on public health, to develop health advisories or other recommendations, and to identify studies or actions needed to evaluate and mitigate or prevent human health effects. A **Public Health Assessment** is a public health assessment conducted at the request of an individual (e.g., a concerned resident or physician) or group.

### **Public Health Advisory**

A public health advisory is a statement of findings that a substance released into the environment poses a significant risk to human health. It **also** includes recommended measures to reduce human exposure and to eliminate, or substantially mitigate, that significant risk.

June 1, 1999

PRELIMINARY NOTIFICATION OF EVENT OR UNUSUAL OCCURRENCE PNO-II-99-020

This preliminary notification constitutes EARLY notice of events of POSSIBLE safety or public interest significance. The information is as initially received without verification or evaluation, and is basically all that is known by Region II staff (Atlanta, Georgia) on this date.

Facility	Licensee Emergency Classification
U. S. Department of the Navy	Notification of Unusual Event
Crystal City, Virginia	Alert
Docket No. 030-29462	Site Area Emergency
License No. 45-23645-01NA	General Emergency
	X Not Applicable

SUBJECT: PRESS INTEREST IN EVENT INVOLVING DEPLETED URANIUM  
AMMUNITION

On May 28, 1999, Region II received press inquiries regarding a February 19, 1999 event in which depleted uranium (DU) ammunition was inadvertently expended on the Live Impact Area (LIA) of the Vieques Naval Range, on Vieques Island in Puerto Rico. The range is a naval weapons firing range and is a restricted area. The NRC was informed of the event on March 5, 1999, after it was identified.

During a training exercise, two U. S. Marine Corps Harrier aircraft expended 263 DU rounds. Each round contains 148 grams of DU in the form of a pencil shaped penetrator. The LIA is located on the eastern tip of the island of Vieques and covers approximately 2.5 square miles. Interviews with the Marine pilots isolated the affected area to a small portion of the LIA called the North Convoy. The LIA is guarded 24 hours per day and only a few individuals are authorized access.

A team of Navy Health Physicists was deployed to the area between March 10 and 19, 1999. The team performed visual and radiological surveys and determined that the penetrators were 10 to 20 feet apart along three distinct paths. A total of 57 penetrators were recovered. Due to dense vegetation in portions of the affected area, the search was suspended because of the possibility of unexploded conventional ordinance. The Navy plans to resume recovery operations in August 1999. The Navy will provide additional information subsequent to this further work.

Region II has been following the Navy's response to this incident and will continue to do so.

The Commonwealth of Puerto Rico has been notified. This information is current as of June 1, 1999, at 11:00 am.

Contact: Michael Fuller  
(404) 562-4714