

5090
Ser 09ER1DS/L5152
February 3, 1995

Ms. Alydda Mangelsdorf
Remedial Project Manager
United States Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

**SUBJ: HEALTH-BASED LEVELS AT ENGINEERING FIELD ACTIVITY WEST,
HUNTERS POINT ANNEX, SAN FRANCISCO, CA**

Dear Ms. Mangelsdorf:

This is in response to your letter dated December 7, 1994 concerning the subject matter. In the letter, you recommended that the Navy adopt U.S. EPA's Preliminary Remediation Goals (PRGs) for use as a human health risk screening tool at Hunters Point Annex (HPA). As stated in your letter, the Navy is currently using a Health-based Levels (HBLs) which were forwarded to you and other members of the Restoration Advisory Board (RAB) through a WESTDIV letter Ser 09ER1DS/L4288 dated June 30, 1994.

In order to alleviate concerns of inconsistencies between EPA Region 9 facilities, the Navy agrees to use U.S. EPA's PRGs in place of HBLs at HPA with the following assumptions:

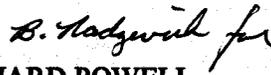
1. HBLs that were used to screen previous sites during the alternative selection reports and site inspection phase will not need to be reevaluated. As recommended in Daniel Stralka's memo of November 30, 1994, PRGs will only be used in subsequent documents, such as the feasibility study.
2. PRGs will be used for screening in site assessments except for naturally occurring inorganics, such as arsenic and beryllium, where screening will either (1) use the HBLs with a target risk of 1E-04 or (2) recalculate the PRGs using a target risk of 1E-04 until background levels are determined. Once background levels are determined, those values should be used as the screening levels.
3. The PRG methodology for determining risk will not be required in future human health risk assessments. However, for interim human health risk assessment reports, such as those supporting property leasing, the PRG methodology to determine risk may be considered. Risk calculations will be performed with methodologies developed in consultation with EPA and Cal/EPA for the baseline risk assessment and remedial investigation reports.
4. The Navy, EPA, and Cal/EPA must come to an agreement on how to address the issue of the PRGs being updated every 6 months.

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Should you have any questions regarding this matter, the point of contact is Commanding Officer, Engineering Field Activity West, Naval Facilities Engineering Command (Attn: Mr. Dave Song, (Code 09ER1DS), (415) 244-2561).

Sincerely,



RICHARD POWELL
Lead Remedial Project Manager

Copy to:

Department of Toxic Substances Control (Attn: Mr. Cyrus Shabahari)
California Regional Water Quality Control Board (Attn: Richard Hiatt)
City and County of San Francisco (Attn: Amy Brownell)
National Oceanic & Atmospheric Administration (Attn: Denise Klimas)
U.S. Fish & Wildlife (Attn: Jim Haas)
California Department of Fish & Game (Attn: Mike Martin)
San Francisco Redevelopment Agency (Attn: Byron A. Rhett)
U.S. Department of the Interior (Attn: Corville Nohava)
U.S. Fish & Wildlife (Attn: Jim Haas)
California Department of Fish & Game (Attn: Mike Martin)
Bay Area Air Quality Management District (Attn: Catherine Fortney)
Bay Conservation and Development Commission (Attn: Jennifer Ruffolo)
ATSDR (Attn: Joan Davis)
San Francisco District Attorney (Attn: John Cooper)
San Francisco Redevelopment Agency (Attn: Byron A. Rhett)
Law Offices of Leslie R. Katz (Leslie Katz)
The New Bayview Committee (Attn: Samuel Murray)
ARC/Arms Control Research Center (Attn: Saul Bloom)
SEED (Attn: Sy-Allen Browning)
Business of Hunters Point Shipyard (Attn: Scott Madison)
Mayor's Hunters Point Shipyard Citizens Advisory Committee (Attn: Al Williams)
Port of San Francisco (Karen Glatzel)
Bay Area Base Transition Coordinator (CDR Al Elkins)
California Office of Environmental Health (Margy Gassel)
California Department of Health Services (Alyce Ujihara)

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