



N60028_001239
TREASURE ISLAND
SSIC NO. 5090.3.A



Department of Toxic Substances Control



Terry Tamminen
Agency Secretary
Cal/EPA

700 Heinz Avenue, Suite 200
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Arnold Schwarzenegger
Governor

November 15, 2004

Ms. La Rae Landers
Lead Remedial Project Manager
Southwest Division, Naval Facilities Engineering Command
BRAC Operations Office
1230 Columbia Street, Suite 1100
San Diego, California 92101-8517

AMBIENT SOIL DIOXIN LEVEL AT THE FORMER NAVAL STATION TREASURE ISLAND, SAN FRANCISCO, CALIFORNIA

Dear Ms. Landers:

The Department of Toxic Substances Control (DTSC) has received and completed a review of your letter regarding the establishment of an ambient soil dioxin level for Naval Station Treasure Island (NSTI), dated September 30, 2004. In your letter you proposed the establishment of an 2,3,7,8-Tetrachlorodibenzo-p-Dioxin (TCDD) toxicity equivalents (dioxin TEQ) ambient level of 12 parts per trillion (ppt) based on the 2000 U.S. EPA nationwide study of ambient dioxin levels in soil as well as the ambient dioxin TEQ that DTSC previously established at the Tourtelot Cleanup Project in Benicia, California.

In addition to reviewing the U.S. EPA nationwide study and consulting with the managers responsible for overseeing the Tourtelot project, we also consulted with our Human and Ecological Risk Division (HERD) and State Hazardous Materials Laboratory (HML) staff who have extensive expertise in evaluating the risks associated with dioxins. Based on input from both HERD and HML staff, DTSC believes that the Navy's proposed ambient dioxin TEQ value of 12 ppt is acceptable but with the understanding that it will be used only as a screening value for soil. DTSC also wants to make clear that the establishment of a dioxin ambient level does not obviate the need to develop risk assessments that include a calculation of risk that is based on all of the constituents present at a specified site, regardless of whether they exceed the US EPA Preliminary Remediation Goals or any other previously agreed upon screening values.

Ms. La Rae Landers
November 15, 2004
Page 2

If you should have any questions regarding this letter, please contact me at (510) 540-3763.

Sincerely,



David Rist
Hazardous Substances Scientist
Office of Military Facilities

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