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LETTER REGARDING NATIONAL PRIORITY LIST HEALTH ASSESSMENT PROCEDURES  
MCB CAMP LEJEUNE NC  
8/27/1987  
AGENCY FOR TOXIC SUBSTANCE AND DISEASE REGISTRY



Agency for Toxic Substances  
and Disease Registry  
Atlanta GA 30333  
August 27, 1987

LTC. Warren Hull  
EPA/DOD Liaison Officer  
Office of Federal Activities (A-104)  
Department of Defense  
401 M Street, S.W.  
Washington, D.C. 20460

Dear LTC. Warren Hull:

In accordance with Section 104(i)(6)(A) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)(42 U.S.C. 9604(i)(6)(A)), the Agency for Toxic Substances and Disease Registry (ATSDR) is required to conduct health assessments for all sites on the National Priority List (NPL), including Federal facilities. These health assessments are to be completed by December 10, 1988 for those sites currently on the NPL and not later than 1 year from the date a facility is proposed for inclusion on the NPL for all new sites. In addition, ATSDR may perform health assessments at Federal facilities in response to petitions under Section 104(i)(6)(B) of CERCLA (42 U.S.C.9604(i)(6)(B)).

We are currently developing procedures to fulfill this requirement under CERCLA in regards to Federal facilities. As a first step in this process, we have established a working definition of what constitutes a health assessment. A copy of this policy document which contains this definition is enclosed.

I have also enclosed a list of those NPL sites which are under the Department of Defense's responsibility. We now are in the process of formulating a status report for each site, including an analysis and current status of ATSDR's health assessment activities for each site. It would be helpful if you would review this list to ensure that it reflects your understanding of the sites for which your Department is responsible to be the subject of health assessments under section 104(i) of CERCLA.

We also request that you indicate an individual who is your Department's primary contact for each site. Because of the tight schedule ATSDR is under to complete these health assessments within the statutory deadline, we request that you provide ATSDR with this information by September 30, 1987.

Thank you for your assistance. Should you have any questions or concerns about this matter, please contact Michael Griffith or Richard Gerber (FTS-236-4630, 404-454-4630).

Sincerely yours,

Barry L. Johnson, Ph.D.  
Associate Administrator, ATSDR

Enclosures

## ATSDR Policy on Health Assessment

### Definitions

The ATSDR health assessment is the evaluation of data and information on the release of toxic substances into the environment in order to: assess any current or future impact on public health, develop health advisories or other health recommendations, and identify studies or actions needed to evaluate and prevent human health effects.

The ATSDR health consultation, in distinction to a health assessment, is a response from ATSDR to a specific question or specific request for information pertaining to a toxic substance or facility (which includes waste sites). A health consultation is therefore a more limited response by ATSDR than what is provided by a health assessment. This document is restricted to policies for health assessments.

The ATSDR health advisory is a communication from the ATSDR Administrator to the EPA Administrator that states ATSDR's concern that a public health threat exists of such importance and magnitude that immediate intervention should be taken by EPA.

### Health Assessment and Risk Assessment

There are purposeful differences between ATSDR's health assessments and EPA's risk assessments. The former is usually qualitative and site specific and focuses on medical and public health perspectives. EPA risk assessments are quantitative risk assessments, compound oriented, that use statistical and biological models to calculate numerical estimates of risk to health, using data from human epidemiological investigations (when available) and animal toxicology studies.

### Procedures

A health assessment is conducted by an ATSDR multidisciplinary team that typically consists of specialists in medicine, epidemiology, toxicology, public health, and environmental engineering. The data and information evaluated by ATSDR assessors are normally supplied by the EPA's Superfund or RCRA programs, sometimes augmented by other data and information from other Federal, State, and local agencies (both governmental and private). In addition to requests from EPA, States, and individual citizens can also petition ATSDR to conduct a health assessment.

A health assessment of a facility or a release consists of the evaluation and interpretation of available information and analytical data describing, among other things:

- the chemical contaminants present in environmental media (air, soil, groundwater, surface water, and human food chains)
- the pathways or potential pathways of human exposure to the contaminants
- the human populations exposed and/or potentially exposed to the chemical contaminants
- the magnitude of human exposure to the chemical contaminants
- and the human toxicity of the chemical contaminants.

### Products

The principal product of an ATSDR health assessment is an analysis and statement of the public health implications of the facility or release under consideration. This analysis and attendant health recommendations, which are based on professional judgment and weight of evidence analysis, are provided to the agency or individual who requests it, most often the EPA. ATSDR supplies the applicable State agencies with a copy of each health assessment.

In addition to providing the Agency's opinion and health recommendations concerning health implications posed by a specific facility or release, ATSDR also reviews each health assessment for the following purposes:

- \* To identify gaps in knowledge concerning the toxicity of substances identified at the facility or release under review;
- \* To identify facilities or releases where biological measurement of human exposure or investigation of human health effects are needed;
- \* To suggest where epidemiological investigations should be undertaken;
- \* To identify human populations for which exposure registries should be considered.

A health assessment for a facility or release is not a single static document or report, but may be a series of reports over time that reflect the dynamic, iterative process of collecting and evaluating new information and data regarding the subject facility, site, or release.

The health assessment process involves gathering information, evaluating the public health implications of the information, and drawing conclusions and making recommendations based on the new information, within the context of all that is known about the facility, site, or release. The conclusions and recommendations are presented in the form of a report, the ATSDR health assessment, together with a review of the information which was considered in its preparation. As more complete information is collected and evaluated, a Health Assessment, with its conclusions and recommendations, may be modified or altered to reflect the public health implications of additional information.

A health assessment report will not normally contain the Agency's recommendations on research gaps, pilot studies (i.e., exposure assessments), epidemiological investigations, health surveillance activities, or exposure registries.

### External Support

The Agency may utilize selected extramural resources to help meet health assessment responsibilities and deadlines under Superfund and RCRA. Contractors may be used to support the data, management and information needs that are associated with a health assessment request. Cooperative agreements will be developed with States having the demonstrated capacity to do their own health assessments and with selected States to help develop their capacity to do health assessments. (State-conducted health assessments of sites on the National Priorities List would be provided to ATSDR for review and final concurrence.)

### Site Visits

It is ATSDR policy that a visit will be made to each facility on the National Priorities List and any other site when such a visit would be useful for better characterization of facility conditions that could affect public health.

### Followup Evaluations

It is ATSDR policy that a followup evaluation be conducted on all recommendations contained in a Health Assessment. The purpose is to obtain information on the effects that the ATSDR recommendations have had on protection of public health.

### Citizen Petitions

The Superfund Amendments and Reauthorization Act of 1986 added the following language to CERCLA, Section 104 (i)(6)(B):

"The Administrator of ATSDR may perform health assessments for releases or facilities where individual persons or licensed physicians provide information that individuals have been exposed to a hazardous substance, for which the probable source of such exposure is a release. In addition to other methods (formal or informal) of providing such information, such individual persons or licensed physicians may submit a petition to the Administrator of ATSDR providing such information and requesting a health assessment. If such a petition is submitted and the Administrator of ATSDR does not initiate a health assessment, the Administrator of ATSDR shall provide written explanations of why a health assessment is not appropriate."

Amendments to the Resource Conservation and Recovery Act of 1984 also provides for individual citizens to present evidence of the release of hazardous substances for purpose of health assessment. Section 3019 (c) reads as follows:

"Members of the Public - Any member of the public may submit evidence of releases of or exposure to hazardous constituents from such a facility, or as to the risks or health effects associated with such releases or exposure, to the Administrator of the Agency for Toxic Substances and Disease Registry, the Administrator, or the State (in the case of a State with an authorized program.)"

Therefore, both the Superfund Amendments and Reauthorization Act of 1986 and the Resource Conservation and Recovery Act Amendments of 1984 permit an individual citizen to petition ATSDR to conduct a health assessment. It will be important to distinguish between an inquiry from a citizen who is seeking information about a site or a chemical from a formal request intended for purpose of submitting a petition for a health assessment. The Agency will develop regulatory language that details how a citizen petition will be handled. In general, ATSDR will take the following steps when responding to a citizen's petition:

- \* Ensure that the petition is submitted in writing to the Associate Administrator, ATSDR.
- \* Acknowledge in writing to the petitioner that the petition was received by the Agency:
- \* Request any existing, relevant data and information from EPA, State agencies, local health agencies, private physicians and other sources;
- \* Make personal contact with the petitioner to ascertain any additional details bearing on the petition;
- \* Contact, with the citizen's permission, any licensed physician treating the citizen in order, when appropriate, to obtain any relevant health information relating to exposure to toxic substances;
- \* Assess any potential public health implications associated with the facility or release, using all available data, supplemented by additional on-site or off-site data when required;
- \* Report the findings to the petitioner, EPA, State agencies (both Health and Environment, if separate agencies), local health agencies, and the citizen's designated personal physician (if authorized to do so by the citizen).
- \* Provide the petitioner with a written explanation when it is determined that a health assessment is not appropriate and will not be conducted.

#### Future Directions

ATSDR looks toward a broader use of health assessments as personnel and resources are increased. The impetus for change is the need to extract additional information from the health assessments that can be used for additional public health purposes. Given this philosophy, the Agency foresees the following enhancements to its health assessment program:

- \* Greater use of health assessment data to determine the need for public health followup (i.e., toxicity information) that can be assessed for research implications;
- \* Use of health assessment data to identify gaps in knowledge (e.g., toxicity information) that can be assessed for research implications;

- \* Closer working relationships with State and local agencies to obtain health-related data not previously supplied to ATSDR and to support State efforts in addressing the public health issues associated with toxic substances;
- \* A concerted effort by ATSDR to periodically conduct retrospective analyses of health assessments in order to develop generalizable relations across facilities or across releases;
- \* Development of a computer-based information system to store and manage the health assessment data base;
- \* Greater use of computer models and graphics to help estimate the movement and fate of toxic substances in the environment and the potential impact upon human populations at risk of exposure to the substances.

NPL				Response	
GRP	ST	Site Name	City/County	Category #	Status
1	CO	Rocky Flats Plant (USDOE)	Golden	R	O
2	CA	McClellan AFB (Ground Water Cont)	Sacramento	R	O
2	CO	Rocky Mountain Arsenal	Adams County	R	O
2	MO	Weldon Spring Quarry	St. Charles County	R	
2	PA	Naval Air Develop Center (8 Areas)	Warminster Township	R	
2	TN	Milan Army Ammunition Plant	Milan	R	I
3	AL	Anniston Army Depot (SE Ind Area)	Anniston	R	O
3	GA	Robins Air Force Base	Houston	R	
3	MD	Aberdeen Proving Ground-Edgewood	Edgewood	R	
4	NE	Cornhusker Army Ammunition Plant	Hall County	R	I
4	NJ	Naval Air Engineering Center	Lakehurst	R	
4	UT	Hill Air Force Base	Ogden	R	I
4	WA	Nav Air Sta, Whid Is. (Ault)	Whidbey Island	R	
6	CA	Sacramento Army Depot	Sacramento	R	
6	IL	Sangamo/Crab Orchard NWR (USDOI)	Cartersville		D
6	ME	Brunswick Naval Air Station	Brunswick	R	
6	UT	Ogden Defense Depot	Ogden	R	
6	WA	Fort Lewis (Landfill No. 5)	Tacoma	R	
6	WA	McChord AFB (Wash Rack/Treatment)	Tacoma	R	
7	CA	Lawrence Livermore Lab (USDOE)	Livermore	R	
7	CA	Sharpe Army Depot	Lathrop	R	
7	IL	Savanna Army Depot Activity	Savanna	R	
7	OK	Tinker AFB (Soldier Cr/Bldg 3001)	Oklahoma City	R	
8	CA	Norton Air Force Base	San Bernardino	R	
8	TX	Air Force Plant #4 (Gen Dynamics)	Fort Worth	R	O
8	UT	Tooele Army Depot (North Area)	Tooele	R	
8	WA	Nav Air Sta, Whid Is. (Seaplane)	Whidbey Island	R	
9	AL	Alabama Army Ammunition Plant	Childersburg	R	O
9	CA	Castle Air Force Base	Merced	R	
9	NJ	Fort Dix (Landfill Site)	Wrightstown	R	
9	NJ	Naval Weapons Stat Earle (Site A)	Colts Neck	R	
9	PA	Letterkenny Army Depot (PDO Area)	Franklin County	R	
10	DE	Dover Air Force Base	Dover	R	I
10	IL	Joliet Army Ammu Plant (LAP Area)	Joliet	R	
11	NY	Griffith Air Force Base	Rome	R	
11	PA	Letterkenny Army Depot (SE Area)	Chambersburg	R	O
11	VA	Defense General Supply Center	Chesterfield County	R	I

12	CA	Moffett Naval Air Station	Sunnyvale	R	
12	IL	Joliet Army Ammu Plant (Mfg Area)	Joliet	R	0
12	MN	Twin Cities Air Force (SAR Lndfl)	Minneapolis		
12	MO	Lake City Army Plant (NW Lagoon)	Independence	R	0
12	WA	Nav Undersea Warf Stat (4 Areas)	Keyport	R	
13	MD	Aber Prov Graund-Michaelsville Lf	Aberdeen	R	
13	OR	Umatilla army Depot (Lagoons)	Hermiston	R	
13	TX	Lone Star Army Ammunition Plant	Texarkana	R	
14	CA	Mather AFB (AC&W Disposal Site)	Sacramento	R	
14	LA	Louisiana Army Ammunition Plant	Doyline	R	
14	WA	Bangor Ordinance Disposal	Bremerton	R	