



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

January 13, 1998

Mr. Philip Otis
U.S. DoN, Northern Division - NAVFAC
10 Industrial Highway
Code 1811/PO - Mail Stop 82
Lester, PA 19113-2090

Re: Review of Responses to Comments on Draft Human Health Risk Assessment (HHRA):
Sites 06, 08 and 11 Groundwater and Site 13 Soil and Groundwater, dated December 1997, at the
former Naval Construction Battalion Center (NCBC) - Davisville, Rhode Island

Dear Mr. Otis:

Pursuant to § 7.6 of the NCBC Federal Facility Agreement (FFA), the Environmental Protection Agency (EPA) has reviewed the above referenced document. Please find our comments enclosed. We have some concerns with the Navy's use of EPA's Lead models to answer RIDEM's concerns at Site 6 and the comments on EPA's internal review draft of the "Draft Dermal Risk Assessment Interim Guidance". This RTC is not an appropriate forum for comments on issues that are irrelevant to our Site Specific concerns.

The final tables should be provided as soon as the data is available from the re-sampling effort at Sites 11 & 13. We will expedite review of the tables so that the final document can be prepared in a timely manner. If you have any other questions with regard to this letter, please contact me at (617) 573-5736.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christine A.P. Williams".

Christine A.P. Williams
Remedial Project Manager
Federal Facilities Superfund Section

Enclosure

cc: Richard Gottlieb, RIDEM
Jayne Michaud, EPA
Walter Davis, CSO
Bryan Wolfenden, RI RC&D Council Inc.
Howard Cohen, RIEDC

Susan Licardi, ToNK
Marjory Myers, Narragansett Indian Tribe
Eileen Curry, Dynamac
Jim Shultz, EA
Linda Gardiner, Stone & Webster Eng.

Navy's Responses to Comments on the Draft Risk Assessment for Sites 06, 08, 11

RIDEM Comment #2, re: page 58, section 1.6.2.1, site 06, whole section.

EPA disagrees with the approach that the Navy used to respond to the RIDEM comment on quantifying lead exposures, in part because the model does not account for maternal/fetal exposures. The EPA adult lead model does account for fetal exposures, and the approach discussed in the following report should be used: "Recommendations of the Technical Review Workgroup for Lead for an Interim Approach to Assessing Risks Associated with Adult Exposures to Lead in Soil." EPA recommends the use of the IEUBK model for assessing children's exposures to lead. EPA also disagrees with the discussion of "naturally occurring blood lead levels". EPA suggests the Navy also refer to the recommended documents cited above for information on blood lead levels in populations not exposed to lead-contaminated soil at a waste site.

Responses to Comments from EPA Review of the Draft HHRA For Sites 6, 8, 11 Groundwater

1. Comment #3.

The UCL approach differs from Region I's standard (not proposed) practice of using maximum site values for groundwater risk assessment. In the report, note the difference in risk estimates that results from using the UCL rather than the maximum concentration.

2. Comment #13(h) and #14.

The Navy's response states that 1,2-Dichloroethene and vinyl chloride were removed as COPCs from Site 11 since the original source of data was the EBS 88 data. Table 1-5 has subsequently been revised and these compounds removed; however, Toluene and trichloroethene have also been removed. Please clarify that all compounds removed were found only at EBS Review Item #88.

3. Comment 15. Response #1 on page 5.

EPA considers the dermal absorption guidance given in the original comments to be reliable. The values are based on an extensive literature reviews that were done to prepare the Draft Dermal Risk Assessment Interim Guidance which is under expert review at this time. EPA Region I expects that the final dermal guidance will contain more absorption values for different chemicals, but does not expect significant changes in the existing dermal absorption values for soil. There may be some changes to the adjustments on toxicity according to recent revisions to the internal draft. The Navy should be aware that the internal draft document is currently undergoing expert review and has not been released for comment.

It is unclear from the Navy's comment exactly what dated information will be obtained

Navy's Responses to Comments on the Draft Risk Assessment for Sites 06, 08, 11

from Region 10 (is it region 10's guidance, a dated draft from the dermal workgroup?). In any case, EPA Region I will not accept comments from the Navy on any aspects of the draft other than the previously discussed absorption and adjustment factors which were recommended for the NCBC site.

EPA suggests that the Navy focus its subsequent reviews on site-specific chemicals. Any comments on other aspects of EPA's internal review draft will be premature and irrelevant.

4. Comment 15. Response "c" on page 5.

As noted above, the draft dermal interim guidance is under review and may contain changes. One more recent change is the addition of values for more chemicals. EPA's draft interim dermal guidance will recommend an oral absorption value of 15% for antimony (Waitz et al., 1965). A value for BEHP in water is not available but a default of 100% is recommended for organics without recommended values. This is based on the dermal workgroup's thorough literature review. These values are recommended for this risk assessment.