



Brown & Root

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C-NAVY-2-98-1119W

February 9, 1998

Project Number 7752

Mr. James Shafer
Remedial Project Manager
Northern Division, Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, Pennsylvania 19113

Reference: CLEAN Contract No. N62472-90-D-1298
Contract Task Order No. 0302

Subject: Response to Comments
on the Plan for Human Health Risk Assessment Derecktor Shipyard (Off-Shore)

Dear Mr. Shafer:

Attached are responses to comments received from The U.S. Environmental Protection Agency on the subject work plan. These comments were received on February 5, 1998.

Please be advised that Brown and Root Environmental is progressing with the Human Health Risk Assessment, and hopes to provide the draft report within the next several weeks. This is an accelerated schedule to allow the PRGs to account for the HHRA results.

If you have any questions regarding this material, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Stephen S. Parker".

Stephen S. Parker
Project Manager

SSP/pmp

Attachment

- c: K. Coyle, NETC (w/encl.)
- K. Keckler, USEPA (w/encl.)
- P. Kulpa, RIDEM (w/encl.)
- J. Stump, Gannett Fleming (w/encl.)
- D. Egan, TAG (w/encl.)
- J. Trepanowski/G. Glenn, B&RE (w/encl.)
- File 7752-3.2 (w/o encl.)

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bc: G. Maynard (w/encl. - 1)
File 7752-8.0 (w/encl. - 1)

Attachment A
Responses to USEPA Comments on the Plan for Human Health Risk Assessment
Off Shore areas of the Former Robert E. Derecktor Shipyard
Comments Received February 5, 1998

Comment 1: As discussed in the 1994 Region I Risk Updates, the appropriate concentration for media other than groundwater is the 95th upper confidence limit ("UCL") of the arithmetic mean. This replaces the use of arithmetic mean and maximum concentrations. The 95th UCL is combined with "average" and "high end" exposure factors to estimate average and reasonable maximum exposed individual doses and risks.

Response: The approach suggested in the comment above is a valid one, and the Navy does not disagree with its use. However, the agreement between the agencies and the Navy was to perform this human health risk assessment using the same exposure factors and quantification procedures that were used to develop the risk assessment for McAllister Point Landfill.

The use of the UCL instead of the average and the maximum concentrations can be performed as suggested, however, as the comment states, an "average" and "high end" set of exposure factors would have to be determined. As the reader may recall, it was the determination and agreement of these exposure factors (shellfish ingestion rates) with the RIDEM that delayed the completion of the HHRA for McAllister, and it may be unproductive to reopen this discussion and try to revise them at this time.

Comment 2: The risk assessment for adult consumers should be based on the adult lead model. A copy of this guidance is enclosed.

Response: The Navy concurs with the suggested approach. The adult lead exposure model shall be used for adult receptors as appropriate.