



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

N00129.AR.000078
NSB NEW LONDON
5090.3a

June 23, 1992

Charles A. Menzie
Menzie Cura & Associates, Inc.
One Courthouse Lane
Suite 2
Chelmsford, MA 01824

Dear Mr. Menzie:

Per our recent telephone conversation, this letter serves to further clarify the human health risk assessment issues raised in EPA's May 20, 1992 letter to Deborah Stockdale of the U.S. Department of the Navy. I recently received additional comments from Jui-Yu Hsieh, EPA's human health risk assessor for the Naval Subbase New London (NSBNL), and will attempt, in the proceeding paragraphs, to communicate EPA's specific items of concern with regard to the risk assessment data presented in the Draft IR Report.

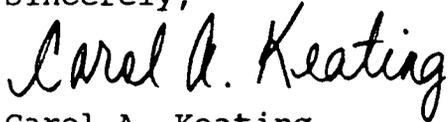
As you may recall from our February 13, 1992 meeting in Boston with representatives from Atlantic Environmental Services, EPA, Alliance Technologies, and Menzie Cura, EPA Region I queried the appropriateness of using surrogate Reference Doses (RfDs) for chemicals without published RfDs utilizing the rationale provided on Table 6-28 of the aforementioned Draft IR Report. EPA's policy has been to use Integrated Risk Information System (IRIS) as the primary source and Health Effect Assessment Summary Tables (HEAST) as the secondary source for the Reference Doses (RfDs) and Cancer Slope Factors (CSFs).

Based on rationale provided during our aforementioned meeting, EPA's Environmental Criteria and Assessment Office (ECAO) was contacted for their assistance in reviewing the information provided by your office. For many of the chemicals in question, EPA has already derived provisional RfDs or has previously evaluated surrogates in response to previous technical assistance requests. As discussed during our June 4 conference call, ECAO has evaluated the appropriateness of using the surrogate RfDs for contaminants detected at NSBNL. Attached for your review are summaries of ECAO's Part II and Part III responses. (Part I of ECAO's response was previously submitted.)



Should you have any questions or comments in regard to the attached material, please do not hesitate to call Jui-Yu Hsieh at (617) 565-3607 or me at (617) 573-5764.

Sincerely,



Carol A. Keating
Remedial Project Manager

Attachments

cc: (w/o attachments)

Mark Leipert, U.S. Department of the Navy
Paul Jameson, CTDEP
Jui-Yu Hsieh, U.S. EPA Region I
Anne Marie Burke, U.S. EPA Region I
Dale Weiss, Alliance Technologies

(w/attachments)

Paul Burgess, Atlantic Environmental Services, Inc.