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From: Commanding Officer, Navy Environmental Health Center
To: Agency for Toxic Substances and Disease Registry (Jeff Kellam), 1600 Clifton Rd., NE, Atlanta GA 30333-4018
Subj: MEDICAL REVIEW OF DRAFT PUBLIC HEALTH ASSESSMENT, NAVAL STATION NORFOLK, VA
Ref: (a) ATSDR ltr of 22 May 02
Encl: (1) Subject Public Health Assessment

1. Per reference (a), we have completed a review of the subject report and forward our comments to you as enclosure (1).
2. We are available to discuss the enclosed information by telephone with you and, if you desire, with you and your contractor. If you require additional assistance, please call Ms. Andrea Lunsford at (757) 953-0951 or Mr. David McConaughy at (757) 953-0942. The DSN prefix is 377. The e-mail addresses are: lunsforda@nehc.med.navy.mil or mcconaughyd@nehc.med.navy.mil.

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NAVY ENVIRONMENTAL HEALTH CENTER ENVIRONMENTAL PROGRAMS DIRECTORATE

Public Health Assessment Review

Location: Norfolk, Virginia

Command: Naval Station Norfolk

Work Description: Public Comment Public Health Assessment

Document Date: 16 May 2002

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Prepared for: ATSDR

Prepared by: ATSDR

Date Received: 28 May 2002

Reviewed by:

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**MEDICAL REVIEW OF PUBLIC COMMENT
PUBLIC HEALTH ASSESSMENT
NAVAL STATION NORFOLK,
NORFOLK, VIRGINIA**

General Comments:

1. The document entitled "Draft Public Health Assessment, Naval Station Norfolk, Norfolk, Virginia," dated 16 May 2002, was provided to the Navy Environmental Health Center (NAVENVIRHLTHCEN) for review on 28 May 2002. The report was prepared by the Agency for Toxic Substances and Disease Registry.
2. We appreciate your consideration of our comments provided on the Draft Public Health Assessment into the Public Comment Public Health Assessment. Based on our discussion of our previous comments, it is our understanding that references to the air pathway, other than the indoor air, were going to be removed. As discussed below references to the air pathway other than indoor air have not been removed.
3. We are still concerned with the clarity of the information presented in the Summary. One of the objectives of the summary is to convey to the reader ATSDR's conclusion as to whether or not a population's exposure to a chemical presents a risk. No clear conclusion is presented for the fish pathway and the indoor air pathway.

Specific Comments and Recommendations:

1. Page 1, "Summary":

Comments:

- a. The summary is the most commonly read portion of the public health assessment document and it is important that it accurately summarize the report's contents in a manner easily understandable by the general public. We believe the Summary needs to be revised in order to meet the needs of the public. Specifically, we feel that the report's conclusions are difficult to understand as written. However, the conclusions presented in the section entitled "Conclusions" are very clear and easy to understand. Therefore, the report would be easier to read and follow if the "Summary" section contained the conclusions in the same format as the "Conclusions" section.
- b. The last sentence of the first paragraph states, "However, NSN has applied for an air operating permit for on-site sources of air emissions pursuant to the Clean Air Act. Emissions limits are expected to be set at levels protective of public health." We are certain that the allowable concentrations specified in the air permit will be protective of public health. As written the implication is that a permit could be granted that is not protective of public health.

Recommendations:

- a. Provide the conclusions in the summary in a similar format as used in the Conclusions Section.
 - b. Consider rewording the text, stating that the air permit will be protective of public health.
2. Page 1, "Summary":
Page 52, "Conclusions":
Pages A-1 and A-2, Appendix A, "Evaluation of Potential Public Health Hazards..."

Comments:

- a. The report concludes on page 52 that exposure to air contaminated with VOCs poses an indeterminate public health hazard to base personnel, their families and members of the surrounding community. The justification for the indeterminate conclusion was based on the "limited air quality data collected in 1992." We do not agree with the conclusion. Furthermore, the description of the air pathway of concern in the "Summary", "Conclusions" and Appendix A are all different.
- b. The Summary indicates that the pathway of concern is limited to the indoor air of Camp Allen Elementary School. Although the Summary does not provide a conclusion, page 3 of the text indicates that there does not appear to be a public health concern relating to the air pathway.
- c. Appendix A, Page A-1, Site 1, Camp Allen Landfill (Area A), states that air does not pose an apparent public health hazard because VOCs were present at levels that would not be expected to cause adverse health effects.
- d. The Public Health Evaluation for Camp Allen Landfill (Area B) on page A-2 of Appendix A states the same as above with the exception of the following statement: "However, VOCs may be present in the bedding of waterlines near the site and may infiltrate pipes affecting taps that they serve. Because data reflecting contaminant levels in any such taps are not available, these potential exposures pose an indeterminate public health hazard." This is not the same as the justification provided in the "Conclusions." The "Conclusions" states that there is "limited data," whereas here the text is stating there is "No Data."
- e. We provided considerable comment on this subject in our comments on the Draft Public Health Assessment. We are attaching a copy of those comments for your convenience and reconsideration. If this is the justification for the indeterminate conclusion as stated above we do not agree. We believe the pathway, as described, is speculative.

Recommendations:

- a. Clarify in the “Summary” and “Conclusion” which air pathway(s) is a concern.
- b. Consider replacing the “Indeterminate” category with “No apparent.”
- c. Consider removing the statement referring to the bedding of the waterline.