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LETTER REGARDING SEACOAST ANTI-POLLUTION LEAGUE REVIEW COMMENTS ON  
THE HUMAN HEALTH RISK EVALUATION FOR OPERABLE UNIT 6 (OU 6) NSY  
PORTSMOUTH ME  
2/8/2002  
LEPAGE ENVIRONMENTAL SERVICES

# Lepage Environmental Services, Inc.

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February 8, 2002

Portsmouth Naval Shipyard  
Code 106.3R, Bldg. 44  
Attn: Ms. Marty Raymond  
Portsmouth, New Hampshire 03804-5000

Subject: Human Health Risk Evaluation, Operable Unit 6 - January 29, 2002 Exposure Assumptions for Evaluation of Child Exposure to Dioxin-like PCBs in Surface Water

Dear Ms. Raymond:

We are transmitting comments on behalf of the Seacoast Anti-Pollution League (SAPL) regarding the Navy's January 29, 2002 Exposure Assumptions for Evaluation of Child Exposure to Dioxin-like PCBs in Surface Water. SAPL appreciates the Navy responding to public concerns regarding potential risks to children in Operable Unit 6. The following comments incorporate input from Dr. David R. Brown:

- 1. Exposure Duration.** The 3-year duration for children ages 4 to 6 years is too short for evaluating cancer risks. An age span of 4 to 12 years would be more appropriate.
- 2. Exposure Frequency.** An exposure frequency of 7 days per year, which the Maine Department of Environmental Protection (MEDEP) uses for assessing risks from exposure during swimming, is insufficient for evaluating the scenario of a child wading or playing in the seep. SAPL concurs with the MEDEP's comment, dated February 8, 2002, that an exposure of 2 days per week over 10 weeks (roughly the course of the summer) would be more appropriate.
- 3. Skin surface area available for contact.** The Navy has proposed using the skin area of the feet of a small child. However, since a child may wading and playing in the seep, the skin area should be increased to include feet and legs as well as the hands.
- 4. Event duration.** The 1-hour duration for an exposure event is too short, and should be lengthened to 4 hours to more accurately represent a visit to the shore.

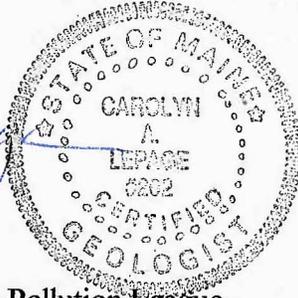
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OU6 Child Exposure Assumptions

If you have any questions regarding the comments above, please give me a call at 207-777-1049.

Sincerely,



Carolyn A. Lepage, C.G.  
President



cc: Jim Horrigan, Seacoast Anti-Pollution League  
Iver McLeod, Department of Environmental Protection  
Meghan Cassidy, Environmental Protection Agency  
David R. Brown, Sc.D.