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From: Commander, Western Division, Naval Facilities Engineering Command
To: Distribution

Subj: ADDENDUM TO WORK PLAN, VOLUME 6, BASELINE
PUBLIC HEALTH AND ENVIRONMENTAL EVALUATION

Encl: (1) Draft addendum to subject project, dtd 6 Feb. 1991

1. In accordance with the Federal Facility Agreement for Naval Station, Treasure Island, Hunters Point Annex, enclosure (1) is forwarded for your review and comments.
2. Should you have any questions regarding this addendum, the point of contact is Commander, Western Division, Naval Facilities Engineering Command (Attn: Louise T. Lew, Code 1811, (415) 244-2551).
3. Submit written comments if any to Mr. Eddie Sarmiento, Commanding Officer, Naval Station, Treasure Island, Building 1 (Code 84), San Francisco, CA 94 130, with a copy to Western Division, Naval Facilities Engineering Command (Louise T. Lew, Code 1811, 900 Commodore Drive, San Bruno, CA 94066).

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**ADDENDUM TO WORK PLAN, VOLUME 6,
BASELINE PUBLIC HEALTH AND ENVIRONMENTAL EVALUATION
REMEDIAL INVESTIGATION/FEASIBILITY STUDY FOR
NAVAL STATION, TREASURE ISLAND,
HUNTER'S POINT ANNEX
SAN FRANCISCO, CALIFORNIA
MARCH, 1989**

This addendum presents modifications to the *Work Plan, Volume 6, Baseline Public Health and Environmental Evaluation, Remedial Investigation/Feasibility Study Hunter's Point Annex, San Francisco, California, March, 1989* in response to comments contained in the September, 1990 Federal Facility Agreement for Hunter's Point Annex (HPA).

The BPHEE Work Plan will not be revised to incorporate changes based on these agency comments. Because guidance on BPHEE preparation, as well as guidance for preparation of risk assessments are changing on a continual basis, it is expected that published guidance up to an agreed upon date such as the start date for the BPHEE will be followed. Guidance issued after this date will be incorporated if the results of the BPHEE would change considerably on the basis of the subsequent guidance. It is expected that agencies will be updated on any changes to the BPHEE approaches in regularly scheduled meetings.

Because the HPA site is a federal Superfund site and in Region IX, EPA (Federal and State) guidance will take precedence over other agency guidance, unless otherwise noted.

Each of the EPA comments contained in Attachment G is paraphrased below and a response is provided. Page numbers referred to in the comments refer to the BPHEE Work Plan.

Comment

Page 1-2: The comment indicates that additional guidance not published at the time the Work Plan was prepared should be consulted, specifically U.S. Environmental Protection Agency (EPA) *Risk Assessment*

Guidance for Superfund: Human Health Evaluation Manual, Volume I, Part A (RAGS) issued in September 1989 and Region IX Environmental Protection Agency recommendations issued on December 15, 1989.

Response

The list of guidance documents to be consulted in the preparation of the BPHEE have been updated to include these and other applicable guidance documents released after March 1989 (See Attachment 1). This list replaces those documents mentioned on pages 1-2 and 1-3 of the Work Plan. As shown in Attachment 1, the RAGS document issued in December 1989 will be consulted. Any changes to this list as a result of new publications or new guidance will be reviewed with the agencies in future meetings.

Comment

Page 1-6: The comment is made that the Work Plan suggests different methods for evaluating aquatic toxicity issues related to surface water bodies and groundwater releases and that the rationale for these differences in evaluation procedures be presented.

Response

It should be noted that comments regarding the environmental evaluation portion of the BPHEE are currently being addressed in response to comments to the *Draft Environmental Sampling Plan for Naval Station, Treasure Island, Hunter's Point Annex, San Francisco, California, August, 18, 1990*. This document should be consulted for a complete discussion of aquatic toxicity issues. In addition, other work plans may be issued in the future to clarify the approach to be used in performing a complete environmental evaluation for the BPHEE according to guidance specified in RAGS, Volume II issued in March 1989. For this reason, the differences in the aquatic toxicity evaluation methods for surface water and groundwater are not addressed in this response.

Comment

Page 3-5: The comment states that RAGS methods for deriving a reduced list of chemicals for risk assessment should be used rather than the "indicator chemical" reduction approach stated in the U.S. Environmental Protection Agency *Superfund Public Health Evaluation Manual (SPHEM)*, 1986.

Response

Since publication of the BPHEE Work Plan, the RAGS guidance has been issued. Therefore, there are several references in the current Work Plan that are no longer considered applicable for use in the BPHEE. Methods and terms discussed in the RAGS December 1989 guidance will be used in place of any methods and terms used in SPHEM. Terms such as "indicator chemical" will be replaced with "chemicals of concern". Additionally, the scoring and ranking methodology described in the March 1989 Work Plan for selecting chemicals of concern is no longer applicable and will be replaced by the methods outlined in RAGS; therefore terms such as medium and chemical-specific "toxicity constants" as used in SPHEM will be in the BPHEE.

RAGS methodologies will be used for reducing the number of site-related chemicals to a list of chemicals of concern for use in the BPHEE. The BPHEE manager will also be in continual communication with all members of the RI/FS team, especially the RI and FS managers. The selection process for selecting chemicals of concern will be conducted so that the risk analyses in the BPHEE and FS include evaluation of the chemicals most representative of past, current, and future site conditions.

Comment

Page 3-8: The comment states that using criteria such as statistical tests to compare site-related chemical concentrations to background chemical concentrations as well as regulatory standards and guidelines, not be used as a benchmark for exclusion of chemicals from the risk assessment. Specifically if chemical concentrations are not found to be elevated statistically significantly above local background levels or above regulatory criteria that they not be excluded from the risk assessment.

Response

RAGS will be consulted to assure that the selection process for chemicals of concern are consistent with EPA guidance. Any methods discussed in the Work Plan that are not in compliance with current EPA guidance will be reviewed and changed accordingly. A chemical will be excluded from the list of chemicals of concern if a combination of criteria used in the selection process provides adequate information to disqualify a chemical as site-related or as a chemical of concern. This method is consistent with the approach outlined in RAGS. A separate analysis of chemicals in question as site-related or background may be incorporated in the BPHEE, if necessary. Full justification will be provided for each of the chemicals excluded from the list of chemicals of concern.

Comment

Page 3-12: The comment states that the likelihood of changes in population demographics in the future on and around HPA need to be incorporated in the risk assessment for the BPHEE.

Response

Both current and future land uses at HPA and areas within a 1-, 2-, and 4-mile radii of the center of HPA will be considered in the BPHEE.

Comment

Page 3-18: The comment states that the term "acceptable level" not be used as a determination of acceptability of projected risks in the risk assessment and that such decisions only be made after completion of and consideration of the risk assessment and other relevant information.

Response

The term "acceptable level" and any reference to the acceptability of the results of the risk assessment will not be used in the BPHEE. The conclusion section of the BPHEE will discuss the health impacts expected to exist or occur at the site by comparing chemical concentrations and risk estimates to various criteria used to assess

and interpret the results of the risk assessment. These criteria will include appropriate and relevant or applicable requirements (ARARs) as well as EPA- established reference doses, slope factors and other health-based toxicological information.

Comment

Page 3-18: The comment states that the use of absorption rates less than 100 percent should be used with caution.

Response

It is expected that chemical- and exposure pathway-specific absorption rates or factors other than the default value of 100 percent will be used in the BPHEE provided there is adequate scientific literature and guidance to support the alternate value. Any absorption factors obtained from the scientific literature will be fully referenced and justified in the BPHEE.

Comment

Page 3-20: The comment refers to the issue of acceptability of estimated health risks.

Response

As noted in the response above, the terms "acceptable" will not be used in the BPHEE.

ATTACHMENT 1

PUBLIC HEALTH AND ENVIRONMENTAL EVALUATION PART A. BASELINE RISK ASSESSMENT GROUP II IR SITES, NAVAL STATION, TREASURE ISLAND, HUNTERS POINT ANNEX, SAN FRANCISCO, CALIFORNIA

The EPA has provided a basic framework for preparing a Public Health and Environmental Evaluation Plan (PHEE; U.S. EPA, March, 1989; U.S. EPA, December, 1989). To the extent applicable and feasible, the following principal guidance documents will be followed in preparing the PHEE (Part A. Baseline Risk Assessment and Part B. Environmental Assessment).

- o U.S. EPA, Risk Assessment Guidance for Superfund, Volume I, Human Health Evaluation Manual (Part A), Interim Final. Office of Emergency and Remedial Response, Washington, D.C. 20460, EPA/540/1-89/002, December, 1989;
- o U.S. EPA, Superfund Exposure Assessment Manual, Office of Emergency and Remedial Response, Washington, D.C. 20460, EPA/540/1-88/001, April, 1988;
- o U.S. EPA, Exposure Factors Handbook, Office of Health and Environmental Assessment, Washington, D.C. 20460, EPA/600/8-89/043, March 1990;
- o U.S. EPA, Exposure Assessment Methods Handbook, Draft, Office of Health and Environmental Assessment, Athens, GA, when document becomes available;
- o U.S. EPA, Guidance for Data Usability in Risk Assessment, Office of Solid Waste and Emergency Response, EPA/540/G-90/008, October, 1990;
- o U.S. EPA Health Effects Assessment Summary Tables, Most Current Quarter, FY 1990/91;
- o U.S. EPA, Integrated Risk Information System Data Base, Current Printout, 1990/91;
- o U.S. EPA, Risk Assessment Guidance for Superfund; Volume II, Environmental Evaluation Manual, Interim Final, Office of Emergency and Remedial Response, Washington, D.C. 20460, EPA/540/1-89/001A, March, 1989.
- o U.S. EPA, Risk Assessment Guidance for Superfund, Human Health Risk Assessment; U.S. EPA Region IX Recommendations, Interim Final, December 15, 1989.

Other guidance documents that may be consulted in the preparation of the PHEE include:

- o CAPCOA, Toxic Air Pollutant Source Assessment Manual, revised December, 1989;
- o State of California, Department of Health Services, The California Site Mitigation Decision Tree Manual, May, 1986;
- o State of California, Department of Health Services, Scientific and Technical Standards for Hazardous Waste Sites, Draft Book II, August 1990;
- o U.S. EPA, Guidelines for Carcinogen Risk Assessment, 51 Federal Register 33992, September 24, 1986;
- o U.S. EPA, Guidelines for Exposure Assessment, 51 Federal Register 34042, September 24, 1986;
- o U.S. EPA, Guidelines for Health Risk Assessment of Chemical Mixtures, 51 Federal Register 34014, September 24, 1986;
- o U.S. EPA, Guidelines for Health Assessment of Suspect Development Toxicants, 51 Federal Register 34028, September 24, 1986;
- o U.S. EPA, Guidelines for Mutagenicity Risk Assessment, 51 Federal Register 34006, September 24, 1986;
- o U.S. EPA, Proposed Amendments to the Guidelines for Health Assessment of Suspect Developmental Toxicants, 54 Federal Register 9386, March, 1989.

The PHEE is being prepared in response to the following requirements:

- o Federal Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980 as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA);
- o National Oil and Hazardous Substances Pollution Contingency Plan (NCP), revised and amended March, 1990;
- o California Department of Health Services (DHS), Remedial Action Order (RAO), Docket No. HSA87/88-034RA, dated January 7, 1988.
- o Federal Facility Agreement, September, 1990

PUBLIC HEALTH AND ENVIRONMENTAL EVALUATION PLAN
DATED 01 MARCH 1989 IS VOLUME 6 OF THE:

REMEDIAL INVESTIGATION/FEASIBILITY STUDY
WORK PLANS

DATED 14 APRIL 1988

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