



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, CA 94105

March 8, 1991

Commanding Officer
Naval Station Treasure Island
ATTN: Eddie Sarmiento, Staff Civil Engineer
Building I (Code 84)
San Francisco, CA 94130

Dear Mr. Sarmiento:

EPA has reviewed the draft Addendum to Work Plan, Volume 6, Baseline Public Health and Environmental Evaluation for Hunters Point Annex. The revisions are approvable with the following clarifications:

1) Page 1, third paragraph. This sentence cites "EPA (Federal and State) guidance...." EPA does not issue guidance on behalf of the State. Did you mean to refer to "EPA and DHS" guidance? Please clarify.

2) Page 3. The first paragraph in the "Response," last sentence, says that "terms such as ... 'toxicity constants' as used in SPHEM will be in the BPHEE." Since the preceding discussion correctly states that RAGS methods and terms will replace those from the out-dated SPHEM, this sentence should be corrected to read "will not be used in the BPHEE." In addition to RAGS, "Risk Assessment Guidance for Superfund: Human Health Risk Assessment: US EPA Region IX Recommendations (December 15, 1989, Interim Final)," should be referenced.

3) Page 3. The second paragraph in the "Response" states that RAGs methodologies "will" be used to reduce the number of site-related chemicals for use in the BPHEE. This should be rewritten to read: "If it is necessary to reduce the number of site-related chemicals to a list of chemicals of concern for use in the BPHEE, RAGS methodologies will be used." RAGS states:

If conducting a risk assessment on a large number of chemicals is feasible (e.g., because of adequate computer capability), then the procedures presented in this section should not be used. (Emphasis added.) (Page 5-20.)

and

... the procedures [for reducing the number of chemicals] may be needed only in rare instances. (Page 5-21.)

The last sentence in the response paragraph, concerning chemicals "most representative of ... site conditions," is ambiguous and, given the requirement to follow the RAGS procedure, unnecessary. It should be deleted.

4) Page 3, last paragraph. The last sentence on the page somewhat misstates EPA's original comment, which was that the fact that a chemical concentration is not significantly above background or is below regulatory criteria may not be sufficient grounds for excluding the chemical. EPA has not said that such chemicals cannot be excluded, only that they cannot automatically be excluded, as was suggested in the original PHEE workplan. After chemical concentrations, including background, have been identified, the regulatory agencies will work with the Navy to determine whether chemicals found at or below background levels or regulatory standards can be excluded from the Risk Assessment.

5) Page 4, first paragraph. The fourth sentence in this paragraph refers to a "method" which is "consistent with ... RAGS." No "method" is presented in the preceding discussion, however; there is merely a general statement about excluding chemicals. The RAGS and Region IX procedures for reducing the number of chemicals are quite specific and reference to them should suffice here. The discussion of "a combination of criteria" and "a separate analysis of chemicals in question" only serves to obscure the Navy's intent to follow the procedures in Section 5.9 of RAGS.

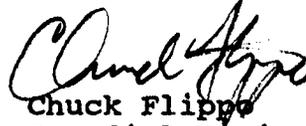
6) Page 4, middle paragraphs. Concerning the identification of changes in population demographics around HPA, population numbers and sensitive receptors (e.g., childcare centers, schools, hospitals, nursing homes) need to be identified as well as "land uses."

7) Page 5, middle paragraph. Use of an absorption rate or factor other than 100% must be approved in advance by EPA and DHS toxicologists. Absent advance approval, 100% must be used.

8) Page 6. The opening sentence of Attachment 1 should read "The EPA has ...". Also, the phrase "To the extent applicable and feasible" at the start of the second sentence should be deleted. Because decision-making at Superfund sites needs to be made using consistent risk assessment procedures and criteria, EPA's RAGS guidance must be followed. There is, however, flexibility built into the guidance to adapt the application of these procedures to site-specific situations. Therefore, the reference to "applicable and feasible" is unnecessary and perhaps misleading.

If you have any questions, please call me at (415) 744-2388.

Sincerely,

A handwritten signature in black ink, appearing to read "Chuck Flippo". The signature is written in a cursive, somewhat stylized font.

Chuck Flippo
Remedial Project Manager

cc: Louise Lew, WESTDIV
Mark Malinowski, DHS
Tom Gandesbery, SFRWQCB
Scott Lutz, BAAQMD
David Wells, SFPHD