

DEPARTMENT OF TOXIC SUBSTANCES CONTROLREGION 2
700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

March 13, 1995



Engineering Field Division, West
Attn: Mr. Richard Powell [09ER1]
900 Commodore Way, Building 101
San Bruno, California 94066-0720

Dear Mr. Powell:

HEALTH-BASED LEVELS AT HUNTERS POINT ANNEX

The Department of Toxic Substances Control, (Department) has evaluated the above issues raised by the Navy in its correspondence to the US EPA. The enclosed memorandum is forwarded to you for your consideration.

Should you have any questions regarding this letter and would like to seek clarification, please call me at (510) 540-3821.

Sincerely,

A handwritten signature in black ink that reads "Cyrus Shabahari".

Cyrus Shabahari
Project Manager
Office of Military Facilities

Enclosure

cc: US EPA
Region IX
Attn: Alydda Manglesdorf
Mail Code H-9-2
75 Hawthorne Street
San Francisco, California 94105

Regional Water Quality Control Board
Attn: Richard Hiett
2101 Webster Street, Suite 500
Oakland, California 94612



DEPARTMENT OF TOXIC SUBSTANCES CONTROL

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**MEMORANDUM**

TO: Cyrus Shabahari, Project Manager
Office of Military Facilities, Region 2
700 Heinz, Second Floor, Building F
Berkeley, CA 94704

FROM: James M. Polisini, Ph.D. 
Office of Scientific Affairs
Human and Ecological Risk Section

DATE: March 6, 1995

SUBJECT: U.S. NAVY USE OF HEALTH-BASED LEVELS
[PCA 14740 SITE 200050-45 OC 2:8]

Background

In response to your request we have reviewed the memorandum from the U.S. Navy to Ms. Alydda Mangelsdorf, the U.S. EPA Remedial Project Manager, with a subject of *Health-based Levels at Engineering Field Activity West, Hunters Point Annex, San Francisco, CA*, dated February 3, 1995 and numbered Ser 09ER1DS/L5152.

General Comments

The memorandum states that the Navy agrees to use the U.S. EPA Region IX PRGs in the place of health-based levels (HBLs) with several 'assumptions' to 'alleviate concerns of inconsistencies between EPA Region IX facilities. We take this agreement to include the use of the 'California adjusted values' which are contained in the U.S. EPA PRG list.

To which parcel are these agreements on the use of HBLs and PRGs applicable? The PRG approach may still be useful at parcels which have not progressed to the RI phase.

Specific Comments

Number 1: We agree that documents already submitted which used HBLs do not require reevaluation. There is an implication that the feasibility study (FS) will be the first document to use the PRG approach. We understand from discussions with Dan Stralka of U.S. EPA Region IX that a proposal was made to produce the RI Report incorporating changes in response to previous comments.

Number 2: As we have previously commented, we do not agree that the use of a target risk of 10⁻⁴ for a screening HBL is appropriate. Nor do we agree that PRGs should be 'recalculated' based on varying target risk levels. We believe the use of PRGs and 'ambient' levels for screening has been addressed as outlined in the minutes of a meeting held January 17,



1995 and DTSC responses contained in an OSA memorandum to Cyrus Shabahari dated February 24, 1995.

Number 3: This item appears to conflict, in part, with item number 1. We agree that the PRG methodology is intended as a screening method and that detailed human health risk assessments should follow U.S. EPA and Cal/EPA guidance. Item number 1, however, states that 'PRGs will only be used in subsequent documents, such as the feasibility study.' while item number 3 indicates that 'The PRG methodology for determining risk will not be required in future human health risk assessments.' Exactly which risk assessments will utilize the PRG methodology and which risk assessments will not? We agree that the PRG methodology, as outlined in the DTSC PRG memorandum dated October 28, 1994, should be used for property lease decisions.

Number 4: We would propose that the screening process be completed with the PRG values contained in the PRG list which is current when the screening process calculations are begun. The current PRG list is dated February 1, 1995.

Conclusions

We agree that documents already submitted which used HBLs do not require reevaluation and that the PRG methodology, as outlined in the DTSC PRG memorandum dated October 28, 1994, should be used for property lease decisions. We propose that risk assessments be completed with the PRG values contained in the PRG list which is current when the risk assessment calculations are begun.

However, there appear to be several items which remain unclear regarding the use of PRGs by the U.S. Navy. An agreement should be reached on:

1. Which parcels remain candidates for PRG use; and,
2. Which specific documents are candidates for use of the PRG methodology.

Reviewed by: Judith A. Parker, Ph.D.
Senior Toxicologist
Human and Ecological Risk Section



cc: Michael J. Wade, Ph.D., DABT, Senior Toxicologist, OMF Coordinator, HERS
Deborah J. Oudiz, Ph.D., Senior Toxicologist, Northern California Liaison, HERS

Dan Stralka, Ph.D.
U.S. EPA Region IX
Superfund Technical Assistance Section (H-9-3)
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