

5090  
Ser 1832.1WM/L5210  
18 Aug. 1995

From: Commanding Officer, Engineering Field Activity, West, Naval Facilities  
Engineering Command

To: Distribution

Subj: RESPONSE TO COMMENTS ON THE PRELIMINARY REMEDIATION  
GOALS, HUNTERS POINT ANNEX, SAN FRANCISCO, CALIFORNIA

Encl: (1) RESPONSE TO COMMENTS ON THE PRELIMINARY REMEDIATION  
GOALS, HUNTERS POINT ANNEX, SAN FRANCISCO, CALIFORNIA

1. Enclosure (1) are responses to comments on the Navy's assumptions regarding the use of Preliminary Remediation Goals at Hunters Point Annex.
2. If you have any questions regarding the Navy response to comments, please contact me at (415) 244-2655.

**Original signed by:**

RICHARD E. POWELL  
By direction of the  
Commanding Officer

Distribution:

U.S. Environmental Protection Agency (Attn: Sheryl Lauth)  
U.S. Environmental Protection Agency (Attn: Claire Trombadore)  
Roy F. Weston, Inc. (EPA Consultant, Attn: Karla Brasaemle)  
Department of Toxics Substances Control (Attn: Cyrus Shabahari)  
California Regional Water Quality Control Board (Attn: Richard Hielt)

Copies to:

PRC Environmental Management, Inc. (Jim Sickles)  
Harding Lawson Associates (David Leland)

Blind copy to:

1832, 62.3, 1832.1, 09CMN  
Don Brown (HPA Caretaker office)  
Admin Record (3 copies)  
Chron, pink, green  
Activity file: HPA L5210WM)

PRC Environmental Management, Inc.  
135 Main Street  
Suite 1800  
San Francisco, CA 94105  
415-543-4880  
Fax 415-543-5480



July 17, 1995

Mr. Richard Powell, Code 1832  
Naval Facilities Engineering Command  
Engineering Field Activity West  
900 Commodore Drive, Building 208  
San Bruno, CA 94066-5006

**Subject:** Navy Responses to Regulatory Agencies Comments on the Navy's Assumptions regarding the use of Preliminary Remediation Goals at Hunters Point Annex Contract No. N62474-88-D-5086, Contract Task Order No. 0142

Dear Mr. Powell:

Enclosed please find one copy each of the Navy's Responses to the U.S. Environmental Protection Agency and California Environmental Protection Agency Comments regarding the use of Preliminary Remediation Goals at Hunters Point Annex for your review. Should you have any questions, please contact me at (415) 222-8344 or Diana Auyeung at (415) 222-8278.

Sincerely,

A handwritten signature in cursive script that reads "Jim Sickles". The ink is dark and the signature is written in a fluid, connected style.

Jim Sickles  
Project Manager

JS/dja

cc: Michael McClelland, Navy  
Diana Auyeung, PRC  
File

RECEIVED

JUL 18 1995

**NAVY RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY COMMENTS  
ON THE NAVY'S ASSUMPTIONS REGARDING THE USE OF PRELIMINARY  
REMEDIAL GOALS AT HUNTERS POINT ANNEX**

The following are the Navy's responses to the U.S. Environmental Protection Agency (EPA) comments on the Navy's assumptions regarding the use of Preliminary Remediation Goals (PRG) at Hunters Point Annex (HPA), San Francisco, California. EPA's comments were presented in a letter from Ms. Alydda Mangelsdorf (EPA) to Mr. Richard Powell (Navy) dated March 22, 1995. Comments are reproduced exactly as submitted to the Navy.

**Comment 1: Navy Assumption #1: PRGs will only be used in future documents. It is U.S. EPA's assumption, as well, that PRGs will be used in future documents, only. However, to clarify this point, the Navy should expand the list of future documents in which a screening with PRGs will be conducted to include: the Remedial Investigation (RI) reports for each Parcel, all Human Health Risk Assessments, the Feasibility Study (FS) reports for each Parcel, all future Environmental Baseline Surveys (EBS) and Finding of Suitability to Lease (FOSL) or Transfer (FOST), and any other future documents in which a screening of human health risk is appropriate. For example, the Site Assessment sites to be investigated in the near future should also be screened using the EPA PRGs when the data for these sites are reported, whether the report to be a Site Inspection (SI) report or Remedial Investigation (RI) report.**

**Further, it is our recommendation that the Site Inspection (SI) reports already published, all sites which were recommended for no further investigation, be reviewed to ensure that the use of PRGs would not have resulted in additional sites requiring further study. U.S. EPA would be happy to discuss the mechanisms most appropriate for accomplishing this recommendation in a conference call to be arranged in the near future.**

**Response:** EPA Region IX PRGs will be used as a screening tool in the following future documents unless a detailed evaluation of site-specific conditions reveals that the use of EPA Region IX PRGs is inappropriate:

- RI and FS reports for Parcels B, C, D and E
- EBSs
- human health risk assessments (HHRA) supporting EBSs
- FOSLs or FOSTs
- Any other documents in which a screening of human health risk is appropriate

HHRAs will use the EPA Region IX PRG methodology to calculate risk or the associated exposure parameters in standard risk assessment calculations (as outlined by EPA's "Risk Assessment Guidance for Superfund," Volume 1, Part A, issued in 1989).

An example of a reason why the use of EPA Region IX PRGs may not be appropriate is that the EPA Region IX PRGs only considers exposure scenarios for residential or industrial settings for soil and does not consider exposure scenarios for recreational settings.

Data for all sites recommended for no further action in the Parcels B through E SI reports will be compared to the EPA Region IX PRGs and qualitatively assessed in the HHRA for the respective RI reports, as demonstrated in the Parcel A RI report.

**Comment 2:** Navy Assumption #2: PRGs will not be used to screen naturally occurring contaminants. U.S. EPA can not accept this assumption. While the Navy is in the process of recalculating the Interim Ambient Levels (IAL) for this site, we can not agree to substitute HBLs or PRGs at  $10^{-4}$  for arsenic and beryllium, instead. The BRAC Cleanup Team (BCT) has adopted a screening process by which both a human health screening and background screening are employed. If data is available for screening prior to the Navy completion of its recalculation of IALs, then the BCT must negotiate a solution to that situation at that time.

**Response:** Ambient levels, called Hunters Point Ambient Levels (HPAL), have been developed by the Navy to replace IALs. However, HPALs have not received concurrence from the regulatory agencies. Once concurrence regarding the HPALs has been received, HPALs will be used for screening purposes as adopted by the BRAC Cleanup Team (BCT).

**Comment 3:** Navy Assumption #3: PRGs will not be used in future Human Health Risk Assessments. U.S. EPA can not accept this assumption. The primary reason for U.S. EPA's recommendation that the Navy adopt PRGs in lieu of HBLs was to help streamline and make more consistent the risk assessment process both for the Remedial Investigation/Feasibility Study and for the Environmental Baseline Survey/Finding of Suitability processes. If the Navy were not to use PRGs in these processes, it is unclear where or when it might then use them. As above, it is our recommendation that the PRGs be adopted for use in future RI reports, FS reports, Risk Assessments, EBSs, FOSLs, FOSTs, and any other reports in which a human health risk evaluation is appropriate.

**Response:** Item number 3 in the memorandum addressed to EPA from the Navy, dated February 3, 1995 was included to reiterate that the Region IX PRG methodology may not be used in HHRAs conducted for reports such as the RI. As discussed in the Response to Comment 1, the EPA Region IX PRG methodology or its associated exposure parameters will be used in all HHRAs unless a detailed evaluation of site-specific conditions (such as future land use) reveals that the use of the EPA Region IX PRGs is inappropriate. The use of EPA Region IX PRGs may not be appropriate for soil exposure scenarios other than residential or industrial. For example, for some areas at HPA it may be more appropriate to screen chemical concentrations to risk-based levels developed for the recreational scenario.

HHRA's conducted for EBSs to support property leases will use the EPA Region IX PRG methodology if the lease is for either the residential or industrial scenario. For other uses, standard risk assessment calculations (as outlined by EPA's "Risk Assessment Guidance for Superfund," Volume 1, Part A, issued in 1989) will be used.

**Comment 4:** Navy Assumption #4: The BCT must come to an agreement on how to address updates of the PRG table. We agree that discussion of this matter is warranted.

Since the data for Parcels B through E are currently undergoing evaluation for the draft versions of the RI reports, for consistency among the RI reports, the Navy proposes that the February 1995 EPA Region IX PRGs be used as the screening tool for the RI reports for the remaining parcels. If it has been determined appropriate to use EPA Region IX PRGs or exposure parameters in the risk calculations, the HHRA will also use the same version as the RI reports.

**NAVY RESPONSES TO CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY  
COMMENTS ON THE NAVY'S ASSUMPTIONS REGARDING THE USE OF  
PRELIMINARY REMEDIATION GOALS AT HUNTERS POINT ANNEX**

The following are the Navy's responses to the California Environmental Protection Agency (Cal/EPA) Department of Toxic Substances Control (DTSC) Office of Scientific Affairs (OSA) comments on the Navy's assumptions regarding the use of Preliminary Remediation Goals (PRG) at Hunters Point Annex (HPA), San Francisco, California. OSA's comments were attached to a letter from Mr. Cyrus Shabahari (Cal/EPA DTSC) to Mr. Richard Powell (Navy) dated March 13, 1995. Comments are reproduced exactly as submitted to the Navy.

**GENERAL COMMENTS**

**Comment 1:** 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.

**Response:** When available, California adjusted values (Cal-modified PRGs) will be used when PRGs are used.

**Comment 2:** To which parcels 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.

**Response:** Health-based levels (HBL) were used as a screening tool in the site inspection (SI) reports for Parcels A through E and in the alternative selection reports (ASR). Additionally, HBLs were also used in the human health risk assessment (HHRA) for the Parcel A SI report.

EPA Region IX PRGs will be used as a screening tool in the following future documents unless a detailed evaluation of site-specific conditions reveals that the use of EPA Region IX PRGs is inappropriate:

- Remedial investigation (RI) and feasibility study (FS) reports for Parcels B, C, D, and E
- Environmental baseline surveys (EBS)
- HHRA's supporting EBSs
- Findings of suitability to lease (FOSL) or transfer (FOST)
- Any other documents in which a screening of human health risk is appropriate

HHRA's will use the EPA Region IX PRG methodology to calculate risk or the associated exposure parameters in standard risk assessment calculations (as outlined by EPA's "Risk Assessment Guidance for Superfund," Volume 1, Part A, issued in 1989).

The use of EPA Region IX PRGs may not be appropriate in cases where soil exposure scenarios are those other than residential or industrial. For example, for some areas at HPA it may be more appropriate to screen chemical concentrations to risk-based levels developed for the recreational scenario

Data for all sites recommended for no further action in the Parcels B through E SI reports will be compared to the EPA Region IX PRGs and qualitatively assessed for the HHRA of the respective RI reports, as demonstrated in the Parcel A RI report.

### SPECIFIC COMMENTS

**Comment 1: Number 1:** We agree that documents already submitted which use 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.

**Response:** See General Comment 2 for documents that will use EPA Region IX PRGs.

The discussions with Mr. Daniel Stralka of EPA Region IX regarding a proposal to produce the RI report incorporating changes in response to previous comments was in reference to the Parcel A RI report. The Navy and the agencies agreed that specifically, for the Parcel A RI, contaminants of concern are defined as chemicals that exceed an EPA Region IX PRG at a carcinogenic risk level of  $1 \times 10^{-6}$  or, for noncarcinogenic compounds, a hazard index of 1. This agreement was reached with the understanding that the HHRA prepared for the Parcel A SI report was adequate with the exception of the evaluation of ingestion of home-grown produce as a potential route of exposure. The HHRA for the Parcel A RI report compared exposure point concentrations to EPA Region IX PRGs and qualitatively assessed the results for the SI sites, and used EPA Region IX PRGs is assessing the RI sites.

**Comment 2: Number 2:** As we have previously commented, we do not agree that the use of a target risk of  $10^{-4}$  for 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.

**Response:** Ambient levels, called Hunters Point Ambient Levels (HPAL) have been developed by the Navy. However, HPALs have not received concurrence from the regulatory agencies. Once concurrence regarding the HPALs has been received, they will be used for screening purposes as adopted by the BRAC Cleanup Team (BCT).

**Comment 3: 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 memorandum dated October 28, 1994 should be used for property lease decisions.

**Response:** Item number 3 in the memorandum addressed to EPA from the Navy, dated February 3, 1995, was included to reiterate that the Region IX PRG methodology may not be used in HHRAs conducted for reports such as the RI. As discussed in Specific Comment 1, the EPA Region IX PRG methodology or the associated exposure parameters will be used in all HHRAs unless a detailed evaluation of site-specific conditions (such as future land use) reveals that the use of EPA Region IX PRGs is inappropriate. For example, the EPA Region IX PRGs do not consider exposure scenarios other than those for the residential or industrial setting for soil.

HHRAs conducted for EBSs to support property leases will use the EPA Region IX PRG methodology.

**Comment 4:** **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.

**Response:** Since the data for Parcels B through E are currently undergoing evaluation for the draft versions of the RI reports, for consistency among the RI reports, the Navy proposes that the February 1995 EPA Region IX PRGs be used as the screening tool for the RI reports for the remaining parcels. If it has been determined appropriate to use EPA Region IX PRGs or exposure parameters in the risk calculations, the HHRA will also use the same version of the EPA Region IX PRGs as the RI reports.