STATE OF CALIFORNIA - ENVIRONMENTAL PROTECTION AGENCY

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

400 P STREET, 4TH FLOOR
SACRAMENTO, CA 95814

August 21, 1995

Commander
Department of the Navy
Engineering Field Activity, West
Naval Facilities Engineering Command
Attn: Mr. Stephen Chao, Project Manager
900 Commodore Drive, Bldg. 101
San Bruno, California 94066-2402

Dear Mr. Chao:

REGULATORY GUIDANCE OF MOFFETT FEDERAL AIRFIELD (MFA) STATION-WIDE REMEDIAL INVESTIGATION (SWRI) MEETING, JULY 28, 1995

The Department of Toxic Substances Control (DTSC) participated the Station-Wide RI meeting on July 28, 1995. Other representatives were from the Regional Water Quality Control Board (RWQCB), the U. S. EPA and the Navy. Followings are the summary of DTSC's policy on several human risk assessment issues raised at the meeting.

I. The first issue concerned whether carcinogenic chemicals need to be included when calculating hazard indices. DTSC's policy is to include all chemicals when calculating a hazard index. The current DTSC hierarchy for use of health risk criteria (cancer slope factors or reference doses) in toxicity assessment is:

1. Cancer slope factors or reference doses promulgated into California regulations.

2. Cancer slope factors or reference doses used to develop environmental criteria promulgated into California regulations. Examples include cancer potency slope factors or reference doses used in deriving State drinking water Maximum Contaminant Levels (MCLs) and cancer potency slope factors used in deriving "no significant risk levels" under the State's Safe Drinking Water and Toxic Enforcement Act of 1986. The health-based dose criteria should be used to estimate risk, not the resulting risk management concentration criteria (e.g., not the MCL).

3. Cancer potency slope factors or reference doses from the U.S. Environmental Protection Agency's Health Effects Assessment Summary Tables (the most current edition).

4. If criteria are not available from the above sources, a DTSC toxicologist should be consulted.

II. The second issue concerned values to use for soil exposure in the recreational (jogger) exposure scenario. The Navy assumed the exposure lasted for one hour and divided the exposure parameters by 16 (number of waking hours in a day) to account for fractional percentage of daily soil exposure from the site. DTSC has sometimes designated a fractional exposure for apportioning exposure from a site. For example, assuming that a worker ingests 50 mg of their daily 100 mg of soil ingested at their workplace. We would imagine that the majority of an adults soil exposure would occur during active outdoor activity (where dust levels are higher) as opposed to more passive indoor activities such as office work, reading or watching TV. Therefore, we would suggest that about one eighth of an individuals daily soil exposure would come during their one hour outdoor recreational time and that the daily exposure parameters be calculated accordingly.

If you have any questions regarding above comments, please call me at (510) 540-3830.

Sincerely,

C. Joseph Chou
Remedial Project Manager
Base Closure Unit
Office of Military Facilities

Enclosure

cc:

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ENCLOSURE

REGULATORY GUIDANCE OF
MOFFETT FEDERAL AIRFIELD STATION-WIDE
REMEDIAL INVESTIGATION MEETING

DATED JULY 28, 1995

THIS ENCLOSURE WAS NOT SUBMITTED TO THE
ADMINISTRATIVE RECORD FILE.

QUESTIONS MAY BE DIRECTED TO:

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