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LETTER REGARDING THE U S NAVY RESPONSE TO U S EPA REGION COMMENTS ON  
THE GRAY AREA INVESTIGATION REPORT MILLINGTON SUPPACT TN  
3/6/2000  
NAVFAC SOUTHERN

**RESPONSE TO WRITTEN USEPA COMMENTS FOR THE  
ERNA GRAY AREA INVESTIGATION REPORT, REVISION: 1  
NAVAL SUPPORT ACTIVITY MID-SOUTH, MILLINGTON, TENNESSEE**

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**Comment 1**

Page 7.8-14, lines 4 through 5 - This sentence states that EPA recommends a target risk of 1E-3 for As. Please see my previous comments on the MAG-41 Report regarding this target risk for As.

**Response 1**

This statement was made based on information provided in the Risk Assessment Forum's *Special Report on Ingested Inorganic Arsenic: Skin Cancer: Nutritional Essentiality* (USEPA, 1988). In this document, then EPA administrator Lee M. Thomas endorsed the EPA Risk Assessment Council's comments and guidance for agency decisions on arsenic-related skin cancer. Mr. Thomas' recommendations, which were based on the Risk Assessment Council's review of the report, were:

- Risks of skin cancers associated with the ingestion of inorganic arsenic be estimated using a cancer potency (slope factor) of  $5 \times 10^{-5} \text{ (mg/L)}^{-1}$ , derived in the Forum's Report.
- In reaching risk management decisions in a specific situation, risk managers must recognize and consider the qualities and uncertainties of risk estimates. The uncertainties associated with ingested inorganic arsenic are such that estimates could be modified downwards as much as an order of magnitude, relative to risk estimates associated with most other carcinogens. In such instances, the management document must clearly articulate this fact and state the factors that influenced such a decision.

The full reference for the Risk Assessment Forum document is:

USEPA. (1988). *Special Report on Ingested Inorganic Arsenic — Skin Cancer; Nutritional Essentiality* (EPA/625/3-87/013). USEPA, Risk Assessment Forum, July 1988.

The text has been modified as follows:

"risk threshold and would result in a cumulative cancer risk estimate less than 1E-4. Based on available toxicological and epidemiological studies on carcinogenic risk from ingestion of arsenic, cancer risk for arsenic can be modified by an order of magnitude by adjusting the acceptable risk range from 1E-6 to 1E-4 down to 1E-5 to 1E-3 (USEPA, 1988)."

**Comment 2**

Section 7.8.6 - Arsenic exceeded the industrial RBCs at two locations (174X000201 and 174X000401) which are the same locations where TPH concentrations exceeded TDEC levels.

The conclusions and recommendations section should note that the elevated Arsenic levels will be removed during the TPH soil contamination VCA. I recommend revising the PRE after the confirmation samples for the VCA are analyzed.

**Response 2**

The text has been modified to reflect that the PRE will be revised after the removal in the Petroleum Sites VCA Report.