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LETTER REGARDING LEPAGE ENVIRONMENTAL SERVICES COMMENTS ON
RECOMMENDED HUMAN HEALTH RISK ASSESSMENT PROTOCOL AND PROCEDURE
FOR EVALUATION OF POTENTIAL BACKGROUND DATA SETS NSY PORTSMOUTH ME
09/23/1998
LEPAGE ENVIRONMENTAL SERVICES

Lepage Environmental Services, Inc.

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September 23, 1998

Peter Vandermark
Seacoast Anti-Pollution League
P. O. Box 1136
Portsmouth, New Hampshire 03802

Subject: Review of Responses to Comments on the *Recommended Human Health Risk Assessment Protocol and Procedure for the Evaluation of Potential Background Soil and Groundwater Data Sets* Technical Memoranda

Dear Mr. Vandermark:

As you requested, we are transmitting comments to the Seacoast Anti-Pollution League (SAPL) concerning the Navy's responses to our June 27, 1998 comments on the *Recommended Human Health Risk Assessment Protocol and Procedure for the Evaluation of Potential Background Soil and Groundwater Data Sets* Technical Memoranda. The majority of our comments were addressed adequately. The following outstanding comments incorporate Dr. David Brown's input.

I. Human Health Risk Assessment Protocol

1. General Comment. If background concentrations of Chemicals of Potential Concern (COPCs) reach levels of human health concern, will they be addressed? Will background concentrations be evaluated to determine if they are accurate or "inflated" by using one half of the detection limit? Citizens want to know when COPCs are dropped that are near health risk levels. Therefore, the Navy must identify them.

2. General Comment. We appreciate having the EPA Region III Risk-Based Concentration (RBC) Table provided in response to our original comment. We note that on the second page of the attachment, the text states that the RBC Table should not be viewed as a substitute for a site-specific risk assessment, and that the Table should generally not be used to set cleanup or no-action levels. Should any of the site values approach the same order of magnitude as the RBCs, these values should be flagged and a justification for using RBCs provided. Because the RBC Table is updated periodically, replacing previous versions, the version used should be cited and a hard copy of that version must be attached as part of the record. If a more protective RBC is issued in the future, that value should be used.

8. **Page 2, Section 2.0.** We would like to clarify that SAPL is concerned that the most protective values be used in evaluating COPCs.

10. **Page 3, Section 3.0.** With regard to using "professional judgement" when there are fewer than 10 samples, we suggest that the Navy's response be incorporated in the text to clarify when and why the 95%UCL (Upper Confidence Limit) will not be used.

15. **Page 5, Section 4.0.** It is not clear in the Navy's response if it's the references for the gastrointestinal (GI) absorption that have been peer reviewed or the concept of deriving dermal cancer factors from GI absorption factors. Our original question related to the latter. Please clarify.

II. Evaluation of Potential Background Soil and Groundwater Data Sets

1. **General Comment.** The Navy responded that its goal was the establishment of background concentrations for use in the Shipyard's Installation Restoration Program, not just for risk assessment. However, the text on page 3, for example, states that "background data sets should concentrate on those chemicals that may be naturally occurring OR may be the result of non-site related anthropogenic activities AND must be evaluated in the quantitative risk assessment." That seems to indicate a narrower focus than the general comparison of background data to site-related contamination data. If the purpose and application of this technical memorandum is the collection of background data, regardless of its use, the text should clearly reflect that.

4. **Page 3, Section 3.0.** We are not sure how the Navy's response applies to the second part of our original comment. If a background sample is found to have one chemical at elevated levels would all the data, including other parameters measured, be eliminated from consideration?

If you have any questions regarding the comments above, please give me a call at 207-777-1049.

Sincerely,

Carolyn A. Lepage

Carolyn A. Lepage, C.G.
President



cc: Iver McLeod, Department of Environmental Protection
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