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DEPARTMENT OF THE NAVY

**ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND**
1510 GILBERT ST.
NORFOLK, VA 23511-2699

TELEPHONE NO:

(757) 322-4795

IN REPLY REFER TO

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U.S. EPA Region III
Attn: Mr. Todd Richardson
Hazardous Site Cleanup Division
Federal Facilities Branch
1650 Arch Street
Philadelphia, PA 19103-2029

RE: Response to comments on the Site 1 ID2 Human Health Risk Assessment Allegany Ballistics Laboratory, Rocket Center, West Virginia

Dear Mr. Richardson:

Thank you for your comments to the *Site 1 ID2 Human Health Risk Assessment Allegany Ballistics Laboratory* (CH2M HILL, August 2002). The comments have been reproduced below, followed by the Navy's response.

Comment 1. The oral-to-dermal adjustment factor for manganese is 4%, not 35%. Note that the new dermal guidance (9/2001) should be used for future risk assessments.

Response: The oral-to-dermal adjustment factor for manganese will be revised accordingly. The 9/2001 guidance will be used for future risk assessments.

Comment 2. The inhalation target organ for barium is fetotoxicity, not cardiovascular. See HEAST 97.

Response: The comment will be incorporated.

Comment 3. The inhalation target organs for TCE are CNS, Liver, and Endocrine System. See NCEA and IRIS for the current file.

Response: The comment will be incorporated.

Comment 4. The inhalation toxicity criterion for dioxin comes from HEAST, not IRIS.

Response: The comment will be incorporated.

Comment 5. Please indicate the source of the RBC for perchlorate. Note: it is not in the RBC table.

Response: The reference for the perchlorate RBC is from USEPA Perchlorate Environmental Contamination: Toxicological Review and Risk Characterization (2002 External Review Draft), NCEA-1-0503, January 16, 2002. The toxicity values provided in the above reference were used to calculate the RBC following the method used in the Region III Risk-Based Concentration table. We recognize this value will likely change subsequent to issuance of the final reference dose.

Comment 6. The RBC for lead in surface water is 15 ppb, not 150 ppb.

Response: The comment will be incorporated.

Comment 7. It is not clear whether the PEF used is a site-specific number. As previously recommended, it should be site specific.

Response: The comment will be incorporated.

These comments will be incorporated into the Draft Site 1 Supplemental Soil Investigation, which will be sent under separate correspondence. If you have any questions concerning this issue, please contact me at (757) 322-4795.

Sincerely,



D. T. O'CONNOR
Remedial Project Manager
Installation Restoration Section
(Caribbean and Other)
Environmental Programs Branch
Environmental Division
By direction of the Commander

Copy to:

WV Dept of Environmental Quality (Mr. Tom Bass)
NAVSEA (Mr. John Aubert; Mr. Lou Williams)
ABL (Mr. Dave McBride)
CH2M HILL (Mr. Steve Glennie)

Blind copy to:

Administrative Record File (ABL)

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