



DEPARTMENT OF THE NAVY

ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
NORFOLK, VIRGINIA 23511-6287

5,01
05.01-12/08/88-00437
TELEPHONE NO

(804) 445-1814

IN REPLY REFER TO
5090
1152SMA

8 DEC 1988

Barry L. Johnson, Ph.D.
Associate Administrator
Agency for Toxic Substances and Disease Registry
1600 Clifton Road, NE
Atlanta, GA 30333

Re: Health Assessments at Naval Security Group Activity, Sabana Seca
and Marine Corps Base, Camp Lejeune

Dear Dr. Johnson:

The enclosed Naval Facilities Engineering Command letter provided guidance to Navy activities regarding health assessments at sites proposed for the National Priorities List (NPL). In accordance with that guidance and Section 104(j)(6) of CERCLA, we are requesting that you perform health assessments at the subject activities which were proposed for the NPL on June 24, 1988.

The activity points of contact are:

Naval Security Group Activity, Sabana Seca: LT Ann Werner,
Public Works Officer, (809) 795-0655; and

Marine Corps Base, Camp Lejeune: Mr. Bob Alexander,
Environmental Engineer, (919) 451-3035

We would like to have the opportunity to review and comment on the draft health assessments prior to finalization and release to the public.

Please feel free to contact either Ms. Sheila Ashton or Ms. Nina Johnson at (804) 445-1814 or (804) 444-8045 with any questions you may have regarding the Installation Restoration Program at these activities.

Sincerely,

P. A. RAKOWSKI, P.E.
Head, Environmental Programs Branch
Utilities, Energy and Environmental
Division
By direction of the Commander

Encl:

(1) Commander, Naval Facilities Engineering Command letter 5090 1121E of
30 November 1987

(804) 445-1814

5090
1152SMA

Copy to: (w/encl)
CNO (OP-45)
CMC (LFL)
COMNAVFACENGCOM
COMNAVMEDCOM
NAVSECGRUACT Sabana Seca
MCB Camp Lejeune
COMNAVFORCARIB Roosevelt Roads
COMNAVSECGRUCOM
NEESA

EPA Region II
Mr. Juan Davila
Room 900
26 Federal Plaza
New York, NY 10278

EPA Region IV
Mr. H. Kirk Lucius
Waste Management Division
345 Courtland Street
Atlanta, GA 30365

Commonwealth of Puerto Rico
Environmental Quality Board
Mr. Juan Mateo
204 Calle Del Pargue
Santurce, PR 00910

North Carolina Division of
Environmental Management
Mr. Preston Howard
7225 Wrightsville Avenue
Wilmington, NC 29403-3969

North Carolina Division of Health Services
Mr. Stan Atwood
Superfund Branch
P. O. Box 2091
306 N. Wilmington Street
Raleigh, NC 27602

Administrative Record (NSGA Sabana Seca)
Administrative Record (MCB Camp Lejeune)



DEPARTMENT OF THE NAVY

NAVAL FACILITIES ENGINEERING COMMAND

200 STOVALL STREET

ALEXANDRIA, VA 22332-2300

5090

1121E

30 NOV 1987

From: Commander, Naval Facilities Engineering Command

Subj: AGENCY FOR TOXIC SUBSTANCES AND DISEASE REGISTRY (ATSDR) HEALTH ASSESSMENTS AT NAVY NATIONAL PRIORITIES LIST (NPL) SITES

Encl: (1) OASD memorandum of 28 Sep 87 with attached ATSDR ltr of 27 Aug 87
(2) NAVFACENGCOM ltr of 24 Nov 87

1. Enclosure (1) requested confirmation of Navy proposed and final NPL sites and a point of contact for each site. Enclosure (2) provides our response, giving points of contact obtained from conversations with your staffs.
2. Enclosure (1) provides additional information on ATSDR policy on health assessments. The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986, requires that ATSDR complete health assessments by 10 December 1988 for each facility proposed for the NPL prior to the enactment of SARA. ATSDR must complete health assessments within one year of the date of proposal for any site proposed for the NPL after the date of enactment of SARA.
3. We consider that enclosure (2) represents a Navy request for ATSDR to conduct health assessments at currently proposed or final NPL sites. Therefore, no separate request is required for these sites. You should keep a copy of enclosure (2) as part of the Administrative Record for each of these sites.
4. In the future, you should request that ATSDR perform a health assessment at any Navy site proposed for the NPL. This request will become part of the Administrative Record for that site.
5. Our point of contact on this matter is Barbara Sparks, Code 1121E, AV 221-8531/8539 or Commercial (202) 325-8531/8539.

David L. Olson

D. L. OLSON
By direction

Distribution:

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NAVFAC - ACTION
Zilly 10/6/87

THE OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
WASHINGTON, D.C. 20301-8000



PRODUCTION AND
LOGISTICS

SEP 28 1987

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MEMORANDUM FOR DEPUTY FOR ENVIRONMENT, SAFETY AND OCCUPATIONAL
HEALTH, OASA (I&L)
DEPUTY DIRECTOR FOR ENVIRONMENT, OASN (S&L)
DEPUTY FOR ENVIRONMENT, SAFETY AND OCCUPATIONAL
HEALTH, (SAF/RIQ)
DEFENSE LOGISTICS AGENCY (DLA-W)

SUBJECT: ATSDR Health Assessments of DoD NPL Sites

In accordance with Section 104 of CERCLA, the Agency for Toxic Substances and Disease Registry (ATSDR) is preparing to conduct health assessments for all DoD sites on the National Priorities List (NPL). Dr. Barry Johnson, Associate Administrator of ATSDR, has requested that we assign points-of-contact for each NPL site to coordinate with ATSDR while they are conducting health assessments.

I have attached Dr. Johnson's letter and request that you contact him directly to provide him with a list of your representatives for coordination with ATSDR.

A handwritten signature in black ink, appearing to read "Carl J. Schafer, Jr.", written in a cursive style.

Carl J. Schafer, Jr.
Deputy Assistant Secretary of Defense
(Environment)

Attachment

F-111



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Agency for Toxic Substances
and Disease Registry
Atlanta GA 30333
August 27, 1987

LTC. Warren Hull
EPA/DOD Liaison Officer
Office of Federal Activities (A-104)
Department of Defense
401 M Street, S.W.
Washington, D.C. 20460

Dear LTC. Warren Hull:

In accordance with Section 104(i)(6)(A) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)(42 U.S.C. 9604(i)(6)(A)), the Agency for Toxic Substances and Disease Registry (ATSDR) is required to conduct health assessments for all sites on the National Priority List (NPL), including Federal facilities. These health assessments are to be completed by December 10, 1988 for those sites currently on the NPL and not later than 1 year from the date a facility is proposed for inclusion on the NPL for all new sites. In addition, ATSDR may perform health assessments at Federal facilities in response to petitions under Section 104(i)(6)(B) of CERCLA (42 U.S.C.9604(i)(6)(B)).

We are currently developing procedures to fulfill this requirement under CERCLA in regards to Federal facilities. As a first step in this process, we have established a working definition of what constitutes a health assessment. A copy of this policy document which contains this definition is enclosed.

I have also enclosed a list of those NPL sites which are under the Department of Defense's responsibility. We now are in the process of formulating a status report for each site, including an analysis and current status of ATSDR's health assessment activities for each site. It would be helpful if you would review this list to ensure that it reflects your understanding of the sites for which your Department is responsible to be the subject of health assessments under section 104(i) of CERCLA.

We also request that you indicate an individual who is your Department's primary contact for each site. Because of the tight schedule ATSDR is under to complete these health assessments within the statutory deadline, we request that you provide ATSDR with this information by September 30, 1987.

Thank you for your assistance. Should you have any questions or concerns about this matter, please contact Michael Griffith or Richard Gerber (FTS-236-4630, 404-454-4630).

Sincerely yours,

Barry L. Johnson, Ph.D.
Associate Administrator, ATSDR

Enclosures

ATSDR Policy on Health Assessment

Definitions

The ATSDR health assessment is the evaluation of data and information on the release of toxic substances into the environment in order to: assess any current or future impact on public health, develop health advisories or other health recommendations, and identify studies or actions needed to evaluate and prevent human health effects.

The ATSDR health consultation, in distinction to a health assessment, is a response from ATSDR to a specific question or specific request for information pertaining to a toxic substance or facility (which includes waste sites). A health consultation is therefore a more limited response by ATSDR than what is provided by a health assessment. This document is restricted to policies for health assessments.

The ATSDR health advisory is a communication from the ATSDR Administrator to the EPA Administrator that states ATSDR's concern that a public health threat exists of such importance and magnitude that immediate intervention should be taken by EPA.

Health Assessment and Risk Assessment

There are purposeful differences between ATSDR's health assessments and EPA's risk assessments. The former is usually qualitative and site specific and focuses on medical and public health perspectives. EPA risk assessments are quantitative risk assessments, compound oriented, that use statistical and biological models to calculate numerical estimates of risk to health, using data from human epidemiological investigations (when available) and animal toxicology studies.

Procedures

A health assessment is conducted by an ATSDR multidisciplinary team that typically consists of specialists in medicine, epidemiology, toxicology, public health, and environmental engineering. The data and information evaluated by ATSDR assessors are normally supplied by the EPA's Superfund or RCRA programs, sometimes augmented by other data and information from other Federal, State, and local agencies (both governmental and private). In addition to requests from EPA, States, and individual citizens can also petition ATSDR to conduct a health assessment.

A health assessment of a facility or a release consists of the evaluation and interpretation of available information and analytical data describing, among other things:

U.S. GOVERNMENT PRINTING OFFICE: 1984

- the chemical contaminants present in environmental media (air, soil, groundwater, surface water, and human food chains)
- the pathways or potential pathways of human exposure to the contaminants
- the human populations exposed and/or potentially exposed to the chemical contaminants
- the magnitude of human exposure to the chemical contaminants
- and the human toxicity of the chemical contaminants.

Products

The principal product of an ATSDR health assessment is an analysis and statement of the public health implications of the facility or release under consideration. This analysis and attendant health recommendations, which are based on professional judgment and weight of evidence analysis, are provided to the agency or individual who requests it, most often the EPA. ATSDR supplies the applicable State agencies with a copy of each health assessment.

In addition to providing the Agency's opinion and health recommendations concerning health implications posed by a specific facility or release, ATSDR also reviews each health assessment for the following purposes:

- * To identify gaps in knowledge concerning the toxicity of substances identified at the facility or release under review;
- * To identify facilities or releases where biological measurement of human exposure or investigation of human health effects are needed;
- * To suggest where epidemiological investigations should be undertaken;
- * To identify human populations for which exposure registries should be considered.

A health assessment for a facility or release is not a single static document or report, but may be a series of reports over time that reflect the dynamic, iterative process of collecting and evaluating new information and data regarding the subject facility, site, or release.

The health assessment process involves gathering information, evaluating the public health implications of the information, and drawing conclusions and making recommendations based on the new information, within the context of all that is known about the facility, site, or release. The conclusions and recommendations are presented in the form of a report, the ATSDR health assessment, together with a review of the information which was considered in its preparation. As more complete information is collected and evaluated, a Health Assessment, with its conclusions and recommendations, may be modified or altered to reflect the public health implications of additional information.

A health assessment report will not normally contain the Agency's recommendations on research gaps, pilot studies (i.e., exposure assessments), epidemiological investigations, health surveillance activities, or exposure registries.

External Support

The Agency may utilize selected extramural resources to help meet health assessment responsibilities and deadlines under Superfund and RCRA. Contractors may be used to support the data, management and information needs that are associated with a health assessment request. Cooperative agreements will be developed with States having the demonstrated capacity to do their own health assessments and with selected States to help develop their capacity to do health assessments. (State-conducted health assessments of sites on the National Priorities List would be provided to ATSDR for review and final concurrence.)

Site Visits

It is ATSDR policy that a visit will be made to each facility on the National Priorities List and any other site when such a visit would be useful for better characterization of facility conditions that could affect public health.

Followup Evaluations

It is ATSDR policy that a followup evaluation be conducted on all recommendations contained in a Health Assessment. The purpose is to obtain information on the effects that the ATSDR recommendations have had on protection of public health.

Citizen Petitions

The Superfund Amendments and Reauthorization Act of 1986 added the following language to CERCLA, Section 104 (i)(6)(B):

"The Administrator of ATSDR may perform health assessments for releases or facilities where individual persons or licensed physicians provide information that individuals have been exposed to a hazardous substance, for which the probable source of such exposure is a release. In addition to other methods (formal or informal) of providing such information, such individual persons or licensed physicians may submit a petition to the Administrator of ATSDR providing such information and requesting a health assessment. If such a petition is submitted and the Administrator of ATSDR does not initiate a health assessment, the Administrator of ATSDR shall provide written explanations of why a health assessment is not appropriate."

Amendments to the Resource Conservation and Recovery Act of 1984 also provides for individual citizens to present evidence of the release of hazardous substances for purpose of health assessment. Section 3019 (c) reads as follows:

"Members of the Public - Any member of the public may submit evidence of releases of or exposure to hazardous constituents from such a facility, or as to the risks or health effects associated with such releases or exposure, to the Administrator of the Agency for Toxic Substances and Disease Registry, the Administrator, or the State (in the case of a State with an authorized program.)"

Therefore, both the Superfund Amendments and Reauthorization Act of 1986 and the Resource Conservation and Recovery Act Amendments of 1984 permit an individual citizen to petition ATSDR to conduct a health assessment. It will be important to distinguish between an inquiry from a citizen who is seeking information about a site or a chemical from a formal request intended for purpose of submitting a petition for a health assessment. The Agency will develop regulatory language that details how a citizen petition will be handled. In general, ATSDR will take the following steps when responding to a citizen's petition:

- * Ensure that the petition is submitted in writing to the Associate Administrator, ATSDR.
- * Acknowledge in writing to the petitioner that the petition was received by the Agency:
- * Request any existing, relevant data and information from EPA, State agencies, local health agencies, private physicians and other sources;
- * Make personal contact with the petitioner to ascertain any additional details bearing on the petition;
- * Contact, with the citizen's permission, any licensed physician treating the citizen in order, when appropriate, to obtain any relevant health information relating to exposure to toxic substances;
- * Assess any potential public health implications associated with the facility or release, using all available data, supplemented by additional on-site or off-site data when required;
- * Report the findings to the petitioner, EPA, State agencies (both Health and Environment, if separate agencies), local health agencies, and the citizen's designated personal physician (if authorized to do so by the citizen).
- * Provide the petitioner with a written explanation when it is determined that a health assessment is not appropriate and will not be conducted.

Future Directions

ATSDR looks toward a broader use of health assessments as personnel and resources are increased. The impetus for change is the need to extract additional information from the health assessments that can be used for additional public health purposes. Given this philosophy, the Agency foresees the following enhancements to its health assessment program:

- * Greater use of health assessment data to determine the need for public health followup (i.e., toxicity information) that can be assessed for research implications;
- * Use of health assessment data to identify gaps in knowledge (e.g., toxicity information) that can be assessed for research implications;

- * Closer working relationships with State and local agencies to obtain health-related data not previously supplied to ATSDR and to support State efforts in addressing the public health issues associated with toxic substances;
- * A concerted effort by ATSDR to periodically conduct retrospective analyses of health assessments in order to develop generalizable relations across facilities or across releases;
- * Development of a computer-based information system to store and manage the health assessment data base;
- * Greater use of computer models and graphics to help estimate the movement and fate of toxic substances in the environment and the potential impact upon human populations at risk of exposure to the substances.

NPL GRP ST	Site Name	City/County	Response Category #	Status
1 CO	Rocky Flats Plant (USDOE)	Golden	R	O
2 CA	McClellan AFB (Ground Water Cont)	Sacramento	R	O
2 CO	Rocky Mountain Arsenal	Adams County	R	O
2 MO	Weldon Spring Quarry	St. Charles County	R	
2 PA	Naval Air Develop Center (8 Areas)	Warminster Township	R	
2 TN	Milan Army Ammunition Plant	Milan	R	I
3 AL	Anniston Army Depot (SE Ind Area)	Anniston	R	O
3 GA	Robins Air Force Base	Houston	R	
3 MD	Aberdeen Proving Ground-Edgewood	Edgewood	R	
4 NE	Cornhusker Army Ammunition Plant	Hall County	R	I
4 NJ	Naval Air Engineering Center	Lakehurst	R	
4 UT	Hill Air Force Base	Ogden	R	I
4 WA	Nav Air Sta, Whid Is. (Ault)	Whidbey Island	R	
6 CA	Sacramento Army Depot	Sacramento	R	
6 IL	Sangamo/Crab Orchard NWR (USDOJ)	Carterville		D
6 ME	Brunswick Naval Air Station	Brunswick	R	
6 UT	Ogden Defense Depot	Ogden	R	
6 WA	Fort Lewis (Landfill No. 5)	Tacoma	R	
6 WA	McChord AFB (Wash Rack/Treatment)	Tacoma	R	
7 CA	Lawrence Livermore Lab (USDOE)	Livermore	R	
7 CA	Sharpe Army Depot	Lathrop	R	
7 IL	Savanna Army Depot Activity	Savanna	R	
7 OK	Tinker AFB (Soldier Cr/Bldg 3001)	Oklahoma City	R	
8 CA	Norton Air Force Base	San Bernardino	R	
8 TX	Air Force Plant #4 (Gen Dynamics)	Fort Worth	R	O
8 UT	Tooele Army Depot (North Area)	Tooele	R	
8 WA	Nav Air Sta, Whid Is. (Seaplane)	Whidbey Island	R	
9 AL	Alabama Army Ammunition Plant	Childersburg	R	O
9 CA	Castle Air Force Base	Merced	R	
9 NJ	Fort Dix (Landfill Site)	Wrightstown	R	
9 NJ	Naval Weapons Stat Earle (Site A)	Colts Neck	R	
9 PA	Letterkenny Army Depot (PDO Area)	Franklin County	R	
10 DE	Dover Air Force Base	Dover	R	I
10 IL	Joliet Army Ammu Plant (LAP Area)	Joliet	R	
11 NY	Griffith Air Force Base	Rome	R	
11 PA	Letterkenny Army Depot (SE Area)	Chambersburg	R	O
11 VA	Defense General Supply Center	Chesterfield County	R	I

12	CA	Moffett Naval Air Station	Sunnyvale	R	
12	IL	Joliet Army Ammu Plant (Mfg Area)	Joliet	R	O
12	MN	Twin Cities Air Force (SAR Lndfl)	Minneapolis		
12	MO	Lake City Army Plant (NW Lagoon)	Independence	R	O
12	WA	Nav Undersea Warf Stat (4 Areas)	Keyport	R	
13	MD	Aber Prov Graund-Michaelsville Lf	Aberdeen	R	
13	OR	Umatilla army Depot (Lagoons)	Hermiston	R	
13	TX	Lone Star Army Ammunition Plant	Texarkana	R	
14	CA	Mather AFB (AC&W Disposal Site)	Sacramento	R	
14	LA	Louisiana Army Ammunition Plant	Doyline	R	
14	WA	Bangor Ordinance Disposal	Bremerton	R	



DEPARTMENT OF THE NAVY

NAVAL FACILITIES ENGINEERING COMMAND

200 STOVALL STREET

ALEXANDRIA, VA 22332-2300

24 NOV 1987

Barry L. Johnson, Ph.D.
Associate Administrator
Agency for Toxic Substances
and Disease Registry
Atlanta, GA 30333

Dear Dr. Johnson:

The Office of the Assistant Secretary of Defense has requested that we answer your letter of August 27, 1987 and provide a primary contact for each proposed and final National Priorities List (NPL) Site under Navy cognizance. The list attached to your letter matches our understanding of Navy-owned proposed and final NPL sites.

Enclosed is a list of points of contact for each Navy NPL site. We are happy to cooperate with you in your legal requirement to perform health assessments at our NPL sites. We believe that health assessments will provide important information needed to determine appropriate site actions. Therefore, we request that you conduct health assessments as soon as possible at the proposed and final Navy NPL sites listed in the enclosure.

Sincerely,

1/41
P.J. YAROSCHAK, P.E.
Deputy Director, Environmental
Quality Division

Enclosure

ENC (2)

Navy Points of Contact for Proposed and Final
National Priorities List (NPL) Sites

<u>Navy Point of Contact</u>	<u>Address and Telephone Number</u>	<u>Cognizant Proposed or Final NPL Site</u>
Ken Petrone	Commanding Officer Northern Division Naval Facilities Engineering Command Philadelphia, PA 19112 215-897-6397	(1) Naval Air Development Center Warminster, PA (8 areas)
Dave Smith or Mike Lucas	Commanding Officer Northern Division Naval Facilities Engineering Command Philadelphia, PA 19112 215-897-6431	(1) Naval Air Engineering Center Lakehurst, NJ
Ron Springfield	Commanding Officer Northern Division Naval Facilities Engineering Command Philadelphia, PA 19112 215-897-6434	(1) Naval Air Station Brunswick, ME
Dave Smith	Commanding Officer Northern Division Naval Facilities Engineering Command 215-897-6431	(1) Naval Weapons Station Earle, NJ (Site A)
Robert Roholt	Pacific Northwest Branch Office Western Division Naval Facilities Engineering Command P.O. Box 2366 Silverdale, WA 98383-2366 206-476-5775	(1) Naval Air Station Whidbey Island, WA (Ault Field) (2) Naval Air Station Whidbey Island, WA (Seaplane) (3) Naval Submarine Base Bangor, WA (Ordnance Disposal) (4) Naval Undersea Warfare Engineering Station Keyport, WA (4 areas)

Navy Points of Contact for Proposed and Final
National Priorities List (NPL) Sites (Continued)

Chloe Jue

Commanding Officer
Western Division
Naval Facilities Engineering
Command

P.O. Box 727
San Bruno, CA 94066
415-877-7494

(1) Naval Air Station
Moffett Field, CA