



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAY 28 1983

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

Peter S. Daley, Lt. Col., USAF, BSC
Director, Environmental Policy
Office of the Assistant Secretary of Defense
Department of Defense
Washington, DC 20301

Dear Colonel Daley:

Thank you for your letter of May 3, 1983. I believe that it is critical for the Environmental Protection Agency (EPA) and the Department of Defense (DOD) to expeditiously resolve problems at Air Force Plant #44 (Tucson, Arizona) and Twin Cities Army Ammunition Plant (New Brighton, Minnesota) so that response actions can proceed. Therefore, the following is our position on trichloroethylene (TCE) cleanup and health protection levels at these facilities. In addition, I have provided you with a proposed agreement on response jurisdiction at sites where DOD has not been confirmed as a source of contamination.

(1) Recommended TCE Levels:

Federal Drinking Water Standards for TCE are currently under development by EPA. Based upon our present assessment of the potential cancer risk and the feasibility of treatment it appears likely that a proposed standard would be in the general range of 5 to 50 parts per billion (ppb). These values are rounded off from the risk calculations performed by the National Academy of Science Safe Drinking Water Committee using the linear multistage extrapolation model and are nominally equivalent to lifetime risks of 1 in 1,000,000 and 1 in 100,000 respectively, assuming consumption of two liters of water per day per person. Of course these are subject to change as the rulemaking process proceeds. For planning your response action, I would recommend that 5 ppb should be viewed as a goal. Alternatives within this range should be examined, and depending on available technology, cost, and the consideration of population and other factors (which is important in major urban areas), an appropriate remedy should be selected. Once the Federal drinking water standard is established, it would be controlling.

EPA's recommended level for short-term exposure is 200 ppb, with respect to the Twin Cities Army Ammunition Plant in New Brighton, Minnesota. In lieu of drinking water standards applicable to TCE, however, our Office of Drinking Water has developed methodologies for determining non-binding health advisories for short-term exposures for a number of chemicals including TCE. These are currently being revised and updated and the numbers may change when that review is completed. However, at this time, this represents our best estimates for minimizing the risk for short-term exposure.

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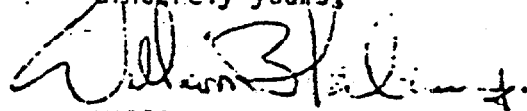
As a note of caution, I might add that both of these recommended levels are of an interim nature and should not be applied to all TCE sites without addressing individual specific site conditions.

(2) Response Jurisdiction Where DOD is a Suspected Source of Contamination

With respect to jurisdictional issues, if DOD is not confirmed as the source of the contamination in areas surrounding a DOD facility, EPA will fund a remedial investigation to determine the source and extent of contamination. Once a determination is made that some or all of the contamination is DOD's responsibility, DOD will reimburse EPA for the DOD share of the costs incurred to date and then a decision will be made on who will take the remaining actions.

I appreciate the efforts you have made in developing a joint DOD/EPA approach to resolving contamination problems suspected to be from DOD facilities. I am also confident that we will continue a concerted effort to address the hazardous waste contamination problems at DOD facilities. Should you have any questions or need further information, please contact me directly.

Sincerely yours,



William N. Hedeman, Jr.
Director

Office of Emergency and Remedial Response

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