

Subject: FW: scanning item - perchlorate

Date: Fri, 14 Jun 2002 09:46:29 -0500

From: Tellez.Debra@epamail.epa.gov

To: Sturdivant.Bob@epamail.epa.gov, Overstreet.Cheryl@epamail.epa.gov, Harris.Jamesa@epamail.epa.gov, Chang.Allen@epamail.epa.gov, Overbay.Michael@epamail.epa.gov, Villarreal.Chris@epamail.epa.gov, Ray.Hillol@epamail.epa.gov, Poeton.Tom@epamail.epa.gov, Ngo.Kim@epamail.epa.gov, Reazin.David@epamail.epa.gov, Ritchey.Charles@epamail.epa.gov, Stubblefield.Joyce@epamail.epa.gov, Mayer.Richard@epamail.epa.gov, Wilkinson.Robert@epamail.epa.gov, Waters.Marvin@epamail.epa.gov, Martinez.Maria@epamail.epa.gov, Roddy.Susan@epamail.epa.gov, Hueni.Camille@epamail.epa.gov, Hendrickson.Charles@epamail.epa.gov, Rodriguez.Jose@epamail.epa.gov, Miller.Garyg@epamail.epa.gov, Tellez.Debra@epamail.epa.gov, Zawistowski.Stan@epamail.epa.gov, Evans.Diane@epamail.epa.gov, Crocker.Philip@epamail.epa.gov, Riley.Jeffrey@epamail.epa.gov, Bary.David@epamail.epa.gov, Roberts.Catherine@epamail.epa.gov, Ellinger.Scott@epamail.epa.gov, King.Laurie@epamail.epa.gov, Price.Lisa@epamail.epa.gov, Atkins.Blake@epamail.epa.gov, Waite.Andrew@epamail.epa.gov, julie_wanslow@nmenv.state.nm.us, john_young@nmenv.state.nm.us, kirby_olson@hotmail.com, dennis_mcquillan@nmenv.state.nm.us, mike.harrell@DEQ.STATE.OK.US, david.lawson@DEQ.STATE.OK.US, hynum@adeq.state.ar.us, murphy@adeq.state.ar.us, clanton@adeq.state.ar.us, neill@adeq.state.ar.us, ollie@adeq.state.ar.us, rusher@adeq.state.ar.us, rigg@adeq.state.ar.us, may@adeq.state.ar.us, Mayer.Kevin@epamail.epa.gov

CC: Gilrein.Stephen@epamail.epa.gov

Scroll down to read the article entitled "DOD CONCERNED OVER NO HUMAN DATA IN PERCHLORATE RISK ASSESSMENT". Also, the attached files contain some of DoD's preliminary comments to the Perchlorate Toxicity Assessment as well as a response to issues raised at the External Peer Review.

----- Forwarded by Debra Tellez/R6/USEPA/US on 06/14/02 09:42 AM -----

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<Brian.J.Condike@swf02.usace.army.mil> To: "Adams, Robert G SWF"
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06/14/02 09:26 AM
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13654

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cc:
Subject: FW: scanning item

- perchlorate

FYI...

Brian J. Condike
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-----Original Message-----

From: Weber, Scott SWD
Sent: Thursday, June 13, 2002 11:22 AM
To: Condike, Brian J SWF
Subject: FW: scanning item - perchlorate

<<epa2002_2037a.pdf>> <<epa2002_2037b.pdf>> <<epa2002_2037c.pdf>>
<<epa2002_2037d.pdf>> Didn't see your name in here . . .

-----Original Message-----

From: Weaver, Michael R NWK
Sent: Wednesday, June 12, 2002 1:20 PM
To: AMCIS01 'Anderegg (E-mail); AMCIS01 Simmons (E-mail); Bob 'Stender (E-mail); DALLAFCEE' 'Manning (E-mail); Darrell L Elliott (E-mail); Coriano, Fernando M. SPD; Harry Hughes (E-mail); Mike Garrison (E-mail 2); Mike 'Vogt (E-mail); Randy Tarbell -AF TX (E-mail); Rudy Stine FORSCOM (E-mail); Susan Stell (E-mail); 1LT Shane 'Mitchell (E-mail); 2Lt Terry C. 'Hale (E-mail); Brian K. 'Murphy (E-mail); Carolyn E. 'Murphy (E-mail); Charles Stagg (E-mail); Charles-TX 'Gawenis (E-mail); Col James Peck (E-mail) (E-mail); CPT James 'Lloyd (E-mail); Darrell L Elliott (E-mail); Dave Boucher (E-mail) (E-mail); Dave 'Tolbert (E-mail); Dave'-TX 'Self (E-mail); David 'Goldblum (E-mail); DCSEN Environmental Compliance Coordinator' 'Parker-Foster (E-mail); Doug 'Ernst (E-mail); Doyle 'Willaims (E-mail); Elza Cushing (E-mail); GARRISON-FSHTX' 'Hudson (E-mail); Gene 'Forsythe (E-mail); Gerald Landreth (E-mail); Glenn Wheat (E-mail); James 'Wheeler (E-mail); Jeffery Blunt (E-mail); Jeffrey R - RRAD' 'Gschwind (E-mail); Jim Wheeler (E-mail); John 'Carroll (E-mail); John D SPA Schelberg (E-mail);
Jonna Polk (E-mail); Katie 'Gagliano (E-mail); Keith 'Kingston (E-mail);
'Kimmerly (E-mail); Larry E SWD Bogue (E-mail); Larry 'Fisher (E-mail); LTC Martha-TX 'Sanders (E-mail); 'Montes Juan' (E-mail); Nancy DPW-TX Niemann (E-mail); Patricia 'Taylor (E-mail); Roberto M 'Concha (E-mail);
Ross - RRAD' 'Ramsauer (E-mail); Scott F MCAAP Sullivan (E-mail); Scott SWD-TX Weber (E-mail); Stephen P SPD Miller (E-mail); Steve DPW-TX Burrow (E-mail); T. A. Ladd (E-mail); Tom 'Turner (E-mail); Valerie-TX 'Stein (E-mail); William 'Fickel (E-mail)
Cc: 'BRACO' 'Flynt (E-mail); COL Richard 'Murphy (E-mail)
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Some of you are in this up to your eyeballs while others are not affected yet. All should get smart on this, it will be getting more attention soon.

Michael R. Weaver
Versar, Inc.
Army Regional Environmental Coordinator - Region VI

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-----Original Message-----

From: Ives, Bart O NWK
Sent: Thursday, June 06, 2002 1:38 PM
To: Weaver, Michael R NWK; Scanlon, Stephen C NWK; Rasmussen, Stanley L
NWK
Subject: FW: scanning item - perchlorate

there'll be a quiz...

-----Original Message-----

From: Rzeszotarski, Peter - AEPI [mailto:przeszot@aepi.army.mil]
Sent: Thursday, June 06, 2002 11:23 AM
To: Bart Ives (E-mail); Connie Van Brocklin (E-mail); Daniel Kowalczyk (E-mail); LTC Kristopher Lemaster AKO (E-mail); MAJ Larry Fauconnet AKO (E-mail); Michael Major (E-mail); Robert Jarrett (E-mail)
Subject: scanning item - perchlorate

DOD CONCERNED OVER NO HUMAN DATA IN PERCHLORATE RISK ASSESSMENT
Echoing industry concerns, the Defense Department is criticizing EPA for failing to include data from human studies on the toxicology of perchlorate in a draft risk assessment and argues that the agency has failed to follow the instructions of a 1999 peer review panel that directed EPA to reduce the uncertainty factor in an earlier risk assessment.

EPA released its draft risk assessment for perchlorate earlier this year with a draft reference dose (RfD) of 0.00003 milligrams per kilogram per day, which would create a hypothetical drinking water equivalent level of 1 part per billion. Perchlorate is a major component of missile and rocket fuel and can affect the functioning of the human thyroid gland, which controls growth and metabolism. The chemical has been found as a soil or water contaminant in nearly every state. EPA expects to finalize the risk assessment by late summer, according to its web site.

"DOD is concerned that the EPA overlooked relevant human studies especially the protocol that EPA helped develop," Air Force Deputy Assistant Secretary for Environment, Safety and Occupational Health Maureen Koetz wrote in a cover letter to DOD comments. "There are errors in the calculations for sensitivity analysis and human equivalent exposures [in certain sections]. As a result of these points, along with the remainder of DoD's comments, it appears the potential human health risk is overestimated."

DOD, in its formal comments, says the risk assessment has coherence and clarity in some sections that have been lacking in previous risk characterizations for other chemicals. But even though the military contributed much of the data EPA used in the risk assessment, DOD says the department "does not: support all of the conclusions as stated in the document; support EPA's proposed revised RfD; and feel that all credible science has been used to generate a truly credible decision regarding perchlorate." Specifically, DOD says that by failing to use available human studies data for perchlorate, "EPA has failed to act in the national interest by not basing its decision on all available credible science."

Larry Glidewell, an Air Force public affairs official, told an external peer review panel this spring that "EPA's perchlorate risk characterization puts too much weight on the results of certain animal studies." He added, "The fact that two studies have demonstrated that workers exposed to very high concentrations of perchlorate do not display alteration of thyroid function is an important piece of information for evaluating the risks from perchlorate exposure."

Annie M. Jarabek, the EPA chemical manager for perchlorate and the author of the assessment, told sister publication Risk Policy Report earlier this year that the human perchlorate studies were carefully considered and dismissed due to a raft of scientific and technical weaknesses. The studies considered by EPA—either observational epidemiologic studies or human clinical studies—suffered from lack of control of confounding factors, poor exposure characterization, a lack of appropriate endpoints and a very small sample size.

Jarabek also responded to an industry criticism that human studies must be considered due to interspecies variations, explaining that while these differences are important in tumor development, they do not impact iodide uptake—the key issue with perchlorate exposure—which occurs in roughly the same manner in humans and animals.

DOD also criticizes EPA's decision to make this RfD more stringent than a 1999 proposed RfD. In particular, DOD cites an increase in the overall uncertainty factor from 100 to 300, saying it "is unwarranted and appears excessive to say the least." And DOD says EPA is "incorrect" in assuming that the same methodologies used to develop a human health RfD are applicable to ecological risk. "In the current document, ecological screening benchmarks for perchlorate appear to be based on endpoints with no known or implicated ecological relevance," Mike Garrison, of the Air Force Center for Environmental Excellence, told the peer reviewers. "For example, the apparent alteration in thyroid function, which serves as the basis for the herbivore dietary screening benchmark, has not been shown to result in any ecologically relevant effects."

DEA 4 Jun 02

ACTIVISTS URGE CALIFORNIA TO TIGHTEN PERCHLORATE STANDARDS

Environmentalists say a proposed California public health goal (PHG) for perchlorate in drinking water is not protective enough as a cleanup standard to prevent brain disorders in fetuses and infants, and are urging the state to promulgate stricter standards. But water, chemical and defense companies are concerned that environmentalists may convince the state to adopt a perchlorate standard closer to a more stringent level proposed by EPA, which the groups say is "too conservative."

Perchlorate contamination is at the center of numerous contaminated site remediation projects in California, with the San Gabriel Superfund site representing one of the largest sites. The site, which is one of the largest groundwater cleanup projects in Superfund history, involves a contaminated groundwater plume that is seven-miles long, one-mile wide and up to 1,000 feet deep, and threatens the drinking water supply of over one million people in southern California.

And while perchlorate contamination has been a problem throughout the West and Southwest, instances of groundwater contaminated with the chemical have been found nationwide.

The Environmental Working Group is calling on the California Office of Environmental Health Hazard Assessment (OEHHA) to lower its proposed PHG for perchlorate to better protect fetuses and infants, which may endure permanent problems as a result of perchlorate in drinking water and breast milk. OEHHA is proposing a 6-parts-per-billion (ppb) PHG, which is significantly higher than EPA's proposed "human health-protective drinking water equivalent level" of 1-ppb. Perchlorate is an ingredient in rocket fuel that regulators are "starting to find more often in California's drinking water," an OEHHA source says.

The American Water Works Association (AWWA) and defense industry companies worry the state may be pressured into following EPA's proposal, which the groups believe is a "too conservative regulatory standard for environmental cleanup and drinking water treatment," according to AWWA.

A PHG is a non-enforceable target that the Department of Health Services will use to craft an enforceable maximum contaminant level for drinking water. OEHHA hopes to have the perchlorate PHG complete by the end of the summer.

OEHHA officials agreed to revisit the issues raised by environmentalists before releasing a revised proposal by early summer. By that time, EPA should also have released a revised draft risk assessment for perchlorate that environmentalists hope may convince OEHHA to tighten its PHG.

DEA 4 Jun 02

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