



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

JUL 17 2002

Pamela Sihvola, Co-Chair
Committee to Minimize Toxic Waste
P.O. Box 9646
Berkeley, CA 94709

Dear Ms. Sihvola:

Wayne Nastri asked me to respond to your June 28, 2002 letter regarding Superfund surface water sampling at the Lawrence Berkeley National Laboratory (LBNL). I appreciate your offer to provide EPA your split samples for analysis as a further check on the LBNL results. EPA has no plans to conduct additional laboratory analyses, because LBNL has already collected the type, quantity, and quality of environmental data that EPA needs to make a decision on NPL listing. Additionally, EPA's split sampling data confirms LBNL sampling results. Please refer to the enclosed letter to Richard Nolan of the U.S. Department of Energy for more information regarding the LBNL sampling data and EPA's conclusions.

Your letter raises several other related issues. We understand from your letter that CMTW's surface water split samples exceed EPA's cancer-risk screening concentration for drinking water (670 picocuries per liter [pCi/L]). We wish to emphasize that screening concentrations are not equivalent to public health standards. Rather, EPA uses screening concentrations to determine whether more study is needed at a particular site to assess the degree of risk. In this case, extensive sampling has been conducted by LBNL, and EPA has verified this data. EPA has concluded that the levels of tritium in surface water do not pose a risk to public health. In addition, we wish to point out that the highest level of tritium in surface water detected by LBNL's lab was 544 pCi/L.

Your letter also points out that groundwater at the site is contaminated with tritium. We agree; indeed, LBNL has found concentrations of tritium in one monitoring well exceeding EPA's drinking water standard (20,000 pCi/L). However, as we have previously stated, groundwater at the site is not used as a source of drinking water, and people are not being exposed to contaminated groundwater. Likewise, although samples collected by CMTW over the past several years indicate that rainwater has, on occasion, exceeded the tritium drinking water standard, rainwater is not directly consumed as drinking water. EPA does not consider drinking water standards applicable or relevant to rainwater.

Thank you for your letter. If you have any questions, please call Philip Armstrong of my staff at (415) 972-3098.

Sincerely,



Jane Diamond, Acting Director
Superfund Division

Enclosure

cc Representative Barbara Lee
 Gene Bernardi, CMTW
 Pamela Sihvola, CMTW
 Carl Schwab, DOE
 Hemant Patel, DOE
 David McGraw, LBNL
 Ron Pauer, LBNL
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 Michael Bessette Rochette, RWQCB
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 Nabil Al-Hadithy, City of Berkeley
 Mayor Shirley Dean and Members of the Berkeley City Council
 Mayor Jerry Brown and Members of the Oakland City Council