



DEPARTMENT OF THE NAVY

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5090
Ser 64/ 01043
10 MAR '94

From: Commanding Officer, Navy Environmental Health Center
To: Commanding Officer, Atlantic Division, Naval Facilities
Engineering Command, Code 18231, Norfolk, VA 23511-6287

Subj: MEDICAL REVIEW OF INSTALLATION RESTORATION PROGRAM
DOCUMENTS FOR OPERABLE UNIT NO. 2, MARINE CORPS BASE, CAMP
LEJEUNE, NORTH CAROLINA

Ref: (a) Baker Environmental, Inc., Transmittal ltr of 1-28-94

Encl: (1) Medical Review of Draft Project Plans for Remedial
Design, Operable Unit No. 2, Marine Corps Base, Camp
LeJeune, North Carolina

1. We have completed a medical review of Parts I (Introduction), II (Workplan), III (Sampling and Analysis Plan) and IV (Quality Assurance Plan) of the document entitled "Draft Project Plans, Contaminated Soil and Groundwater Remedial Design, Operable Unit No. 2, Marine Corps Base, Camp Lejeune, North Carolina" forwarded by reference (a). Our review indicates that medical review comments and recommendations may not be relevant, appropriate or useful for these types of project plans (i.e., project plans for remedial designs). General comments are provided as enclosure (1).

2. The technical point of contact for the medical review is Ms. Andrea Lunsford, Head, Health Risk Assessment Department. If you would like to discuss the enclosed information or if you desire further technical assistance, please call her at (804) 444-7575, extension 402.

3. To coordinate future medical reviews, please call Ms. Sheila A. Berglund, P.E., Head, Installation Restoration Program Support Department at (804) 444-7575 or DSN 564-7575, extension 430.

W. P. THOMAS
By direction

**MEDICAL REVIEW OF
DRAFT PROJECT PLANS FOR REMEDIAL DESIGN, OPERABLE UNIT NO. 2
MARINE CORPS BASE, CAMP LEJEUNE, NORTH CAROLINA**

General Comments:

1. Parts I (Introduction), II (Workplan), III (Sampling and Analysis Plan) and IV (Quality Assurance Plan) of the document entitled "Draft Project Plans, Contaminated Soil and Groundwater Remedial Design, Operable Unit No. 2, Marine Corps Base, Camp Lejeune, North Carolina" were reviewed by personnel in the Health Risk Assessment Department. We have not previously reviewed remedial design plans and therefore needed to determine whether medical review of these parts of the design plans would be relevant, appropriate, or useful. (There is no question that medical review of the Health and Safety Plan, Part V, is appropriate; that section is being reviewed by another department.)

2. In our opinion medical review comments are not relevant, applicable, or useful for these project plans because:

a. The project plans primarily address engineering methodology vice risk assessment or public health issues.

b. The project plans are for a remedial design plan, indicating that the risk management decisions for the site have already been made; that the risk management decisions have been based on risk estimates and other information provided in previous documents, such as the Remedial Investigation Report for Operable Unit No. 2.

c. The text states that a Record of Decision (ROD) has already been signed, indicating that consensus has already been reached among the EPA, the state, and the facility as to which remedial actions are appropriate at this site.

3. Parts I through IV do contain references to contaminant levels observed during the remedial investigation (RI) of OU2. However, this information is presented only in the context of providing readers with cursory summaries of the problems, approaches, and selected solutions.

4. Sections 4.2 and 4.3 of the workplan state that additional documents, i.e., a "Draft Statement of Work" (which reportedly will outline the scope and requirements of the specific remedial actions) and a "Basis of Design" (which reportedly will be "a bound presentation of assumptions, facts, background and general calculations"), will be developed. We are available to review any subsequent documents which have a risk assessment or public health component.

Enclosure (1)

5. The technical point of contact for this review of the draft project plans is Ms. Andrea Lunsford, Head, Health Risk Assessment Department, Environmental Programs Directorate, NAVENVIRHLTHCEN, who may be contacted at (804) 444-7575 extension 402.