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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

February 14, 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4WD-FFB

Ms. Linda Berry
Department of the Navy - Atlantic Division
Naval Facilities Engineering Command
Code 1823
Norfolk, Virginia 23511-6287


SUBJ: MCB Camp Lejeune - OU2
Draft Final Aquatic Survey

Dear Ms. Berry:

The Environmental Protection Agency (EPA) has completed its review of the above listed document. Comments are enclosed.

If there are any questions or comments, please call me at (404) 347-3016.

Sincerely,


Gena D. Townsend
Senior Project Manager

Enclosure

cc: Mr. Neal Paul, MCB Camp Lejeune
Mr. Patrick Watters, NCDEHNR

Comments

The baseline risk assessment in this document has assumed some inappropriate exposure parameters. Use of more appropriate exposure assumptions results in carcinogenic risk estimates of about 1×10^{-4} for ingestion of fish contaminated with the maximum PCB concentration. This is about 20 times greater than the risk estimated in this document.

This document has dealt with potential human health effects from the fish contamination to the exclusion of assessment of any ecological effects. Potential ecological effects should be investigated; if this has already been done, it should be so stated in this document.

Comments to be Conveyed to the Document Preparer

1. Sections 3, 5. The EPA guidance document from which the screening values were obtained used a risk of 1×10^{-5} , but suggested that target risk levels for screening values should be selected by the risk manager (in this case, the EPA RPM). In applying screening values to retain or eliminate contaminants from further risk considerations, the Superfund program generally uses values based on 1×10^{-6} risk and 0.1 HQ. It appears that, for this particular risk assessment, use of these more protective screening values would not result in retention of any additional chemicals of potential concern. However, the above criteria should be reflected in this document.
2. Section 5.2.2.1; Table 5-1. For the scenario assessing ingestion of fish, it is inappropriate to assume an ingestion rate (IR) of 6.5 g/dy in conjunction with an exposure frequency (EF) of 48 dy/yr. The IR of 6.5 g/dy is based on averaging the ingestion over the entire year and thus should be used in conjunction with a EF of 365 dy/yr (RAGS, 1989). EPA Region IV currently recommends a default IR of 145 g per meal, with EF (number of meals of fish per year) to be determined on a site-specific basis. If no site-specific EF is available, 48 meals/yr could be used as a default value (RAGS, 1989).