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DEPARTMENT OF THE NAVY
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IN REPLY REFER TO:

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NOV 23 1993

CERTIFIED MAIL RETURN RECEIPT REQUESTED

United States Environmental Protection Agency,
Region IV
Attn: Ms. Gena Townsend
Waste Management Division
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Re: MCB Camp Lejeune; Response to EPA Region IV Comments
(Risk Assessment Section) on the Draft RI/FS Project
Plans for Operable Unit No. 7 Sites 1, 28, and 30)

Dear Ms. Townsend:

This letter addresses your comments (from Risk Assessment
Section) on the above referenced project. Navy/Marine Corps
responses are attached.

Any questions concerning these responses should be directed to
Ms. Katherine Landman at (804) 322-4818.

Sincerely,

L. A. Boucher for

L. A. BOUCHER, P.E.
Head, Installation Restoration
Section (South)
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

Attachment

Copy to:
NCDEHNR (Mr. Patrick Watters)
MCB Camp Lejeune (Mr. Neal Paul)
Activity Admin Record File

ATTACHMENT A

Response to Comments Submitted by the
U.S. Environmental Protection Agency, Region IV
Risk Assessment Section
on the Draft RI/FS Project Plans for Sites 1, 28, and 30,
(Operable Unit No. 7), MCB Camp Lejeune, North Carolina
Comment Letter by Ms. Gena Townsend,
Received by Baker, Environmental, Inc. via Fax on 9-24-93

Response to Specific Risk Assessment Comments - Work Plan

1. Samples will be collected from the top 12 inches of soil (surface sample) for the purposes of deriving a concentration term for direct human contact in the baseline risk assessment. This change will be made throughout the text.
2. The current USEPA toxicology database will be used in the risk assessment.
3. The National Contingency Plan preamble indicates that, typically, Preliminary Remediation Goals (PRGs) are developed at scoping or concurrent with the initial RI/FS activities (i.e., prior to completion of the baseline risk assessment). By developing PRGs early in the decision making process, the design staff may be able to streamline the consideration of remedial alternatives. In addition, chemicals (specific PRGs) can be used as concentration goals for individual chemicals for a specific medium and land use combinations (i.e., selection of analytical detection limits). Therefore, PRGs will be incorporated in the Work Plan in order to aid in the selection of analytical methods and initiate the remedial alternative selection process.

Risk-based PRGs are initial values and require future clean-ups to meet these levels. Therefore, upon completion of the baseline risk assessment, a review of the media, the chemicals of potential concern, future land use, and exposure assumptions originally identified at scoping is required. These risk-based PRGs will be used in conjunction with ARARs in the Feasibility Study (FS). Site-specific PRGs will be finalized subsequent to the screening of remedial alternatives in the FS as Remediation Levels (RL) in the Record of Decision (ROD).

As part of the FS, site-specific risk-based PRGs will be calculated, based on the results of the baseline risk assessment for the selection of remedial alternatives. Therefore, the FS report is the logical place to present the site-specific PRGs.