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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

May 25, 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4WD-FFB

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

SUBJ: MCB Camp Lejeune - OU10
Draft Interim Remedial Action
Remedial Investigation & Feasibility Study

Dear Ms. Landman:

The Environmental Protection Agency (EPA) has completed its review of the "Draft Interim Remedial Action, Remedial Investigation/Feasibility Study, Operable Unit 10, Site 35, dated April 5, 1994. Comments on the human health aspects are enclosed.

If there are any questions or comments, please call me at (404) 347-3016 or voice mail (404) 347-3555, x-6459.

Sincerely,

A handwritten signature in cursive script that reads "Gena D. Townsend".

Gena D. Townsend
Senior Project Manager

Enclosure

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

Comments

1. Remedial Investigation (RI) pg ES-3, paragraphs 2, 3.
It should be clearly explained here that the Comprehensive Remedial Investigation will include a comprehensive baseline risk assessment for human health as well as for ecological concerns.
2. RI Tables 6-1, 6-2, 6-3.
Please explain what the "K", "L" designations indicate (next to several of the concentration values).

The risk (1E-6)-based concentration for bis(2-ethylhexyl) phthalate for residential soil is 46 ppm.
3. RI Tables 6-2, 6-3, 6-5.
Despite not being listed on the Region RBC Table, dibenzofuran has a provisional RfD of 4E-3 mg/kg-d (EPA-Environmental Criteria and Assessment Office, 1993), which should be used to assess its potential health risk.
4. RI Table 6-4.
The Averaging Time (AT) for the noncarcinogenic endpoint should be 365 days (ED x 365). The appropriate value is shown in the risk calculations in Appendix D.

The Exposure Frequency (EF) of 100 days/year appears to be a professional judgement value rather than from EPA Standard Default Exposure Factors (1991).
5. RI Table 6-4; Section 6.2.2.2, pg 6-13.
The surface area of the adult male head, forearms, hands is 3160 (not 5300) cm². 5300 cm² would include the lower legs as well.
6. RI Table 6-4; Section 6.2.2.3, pg 6-14.
The default Respiration Rate (RR) recommended by the EPA Standard Default Exposure Factors (1991) for the occupational setting is "20 m³ per 8-hour workday", which corresponds to 2.5 (not 0.83) m³ per hour.
7. RI Table 6-5; Table 6-7; Appendix D.
For calculation of risks from dermal exposure, oral toxicity values must first be converted to an absorbed dose value (see Appendix A of Risk Assessment Guidance for Superfund, Vol. I, Part A, EPA, 1989).
8. Feasibility Study (FS) Section 1.2.6, pg 1-7, paragraph 4.
The statement "HI value of 0.006 was calculated for the on-site Site 35 worker" does not agree with the value in the RI (risk assessment) portion of the report (Tables 6-7, 6-9 of RI).