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DEPARTMENT OF THE NAVY

NAVY ENVIRONMENTAL HEALTH CENTER
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Ser. EP/WB:4096/02597
27 SEP 1995

From: Commanding Officer, Navy Environmental Health Center
To: Commanding Officer, Atlantic Division, Naval Facilities
Engineering Command, ATTN: Katherine Landman, 1510 Gilbert
Street, Norfolk, VA 23511-2699

Subj: MEDICAL REVIEW OF INSTALLATION RESTORATION PROGRAM
DOCUMENTS FOR MARINE CORPS BASE, CAMP LEJEUNE, NC

Ref: (a) Baker Environmental transmittal ltr of 27 Jul 95

Encl: (1) Medical Review of Draft Proposed Remedial Action Plan
Operable Unit No. 8, Site 16, Marine Corps Base, Camp
Lejeune, North Carolina
(2) Medical/Health Comments Survey

1. As you requested in reference (a), we completed a medical review of the "Draft Proposed Remedial Action Plan Operable Unit No. 8, Site 16, Marine Corps Base, Camp Lejeune, North Carolina." The attached comments are included for your information as enclosure (1).

2. Please complete and return enclosure (2). Your comments are needed to continually improve our services to you.

3. The points of contact for this review are Ms. Wendy Bridges or Mr. David McConaughy, Health Risk Assessment Department. If you would like to discuss this medical review or if you desire further technical assistance, please call them at (804) 363-5552 or 363-5557, respectively, DSN 564.

A handwritten signature in cursive script that reads "Y. P. Walker".

Y. P. WALKER
By direction

**MEDICAL REVIEW OF DRAFT PROPOSED REMEDIAL ACTION PLAN
OPERABLE UNIT NO. 8, SITE 16, MARINE CORPS BASE,
CAMP LEJEUNE, NORTH CAROLINA**

Ref: (a) Phone Conversation with Kevin Koporec, United States Environmental Protection Agency (U. S. EPA) Region IV, Atlanta GA of 21 August 1995

General Comment: The draft document entitled "Proposed Remedial Action Plan Operable Unit No. 8, Site 16, Marine Corps Base, Camp Lejeune, North Carolina," dated 27 July 1995 was provided to the Navy Environmental Health Center (NAVENVIRHLTHCEN) for review on 31 July 1995. The draft Proposed Remedial Action Plan (PRAP) was prepared for Atlantic Division, Naval Facilities Engineering Command by Baker Environmental, Inc. This PRAP is issued to state its preferred remedy - "No Further Remedial Action Decision."

Review Comments and Recommendations:

1. Page 3, "Baseline Human Health Risk Assessment"

Comment: This PRAP should address any information concerning the surrounding community; the distance to Site 16, whether community residents are anticipated to participate in any recreational activities where they could contact potentially contaminated site-related media (e.g., current and future fugitive dust inhalation exposure potential emanating from on-site surface and subsurface soils), etc.

Recommendation: Provide available information concerning the nearby residential communities and discuss any potential transport mechanisms that would cause neighboring residents and future populations to be exposed to site-related contamination, if applicable.

2. Page 3, "Baseline Human Health Risk Assessment"

Table 1, "Summary of Site Contamination Operable Unit No. 8 (Site 16), Proposed Remedial Action Plan, CTO-0274, MCB, Camp Lejeune, North Carolina"

Comments:

a. Table 1 indicates that no comparison values have been established for surface and subsurface soils. While it is true that no applicable or relevant and appropriate requirements (ARARs) have been established for soil, the human health risk assessment (HHRA) indicates that risk-based concentrations (RBCs) were used as a criterion to select contaminants of potential concern (COPC). The RBCs are not provided for soil or any other media listed in Table 1. By reference (a), Region IV uses Region III Risk Based Screening Concentrations to select COPCs. This document should include a list of RBCs used for comparison purposes and indicate specific chemicals eliminated from the risk assessment based upon comparison to RBCs.

b. For inorganic contaminants in surface and subsurface soil, Table 1 uses the background as a comparison value. Table 2 indicates COPCs that were carried through the HHRA. Soil samples should also be compared with U. S. EPA Region III RBC Tables for residential and/or industrial exposure pathways.

Recommendation: Provide the RBC Region III values in Table 1 for ease of review and comparison to site-related data.

FROM: _____
 (YOUR NAME/COMMAND)
 TO: NAVENVIRHLTHCEN, ENVIRONMENTAL PROGRAMS
 FAX: COM: (804) 444-7261/DSN: 564-7261

MEDICAL/HEALTH COMMENTS - YOUR VIEW

Please help us improve our review process by indicating the extent to which you agree or disagree about the comments we provided for to your activity.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
1. "Value added" to IR/BRAC process?	1	2	3	4	5
2. Received in a timely manner?	1	2	3	4	5
3. High level of technical expertise?	1	2	3	4	5
4. Very useful to the RPM?	1	2	3	4	5
5. Contractor incorporated comments?	1	2	3	4	5
6. Easily readable/useful format?	1	2	3	4	5
7. Overall review was of high quality?	1	2	3	4	5
8. NAVENVIRHLTHCEN was easily accessible?	1	2	3	4	5
9. NAVENVIRHLTHCEN input during scoping or workplan development would be "value added"?	1	2	3	4	5
10. Added involvement in IR/BRAC document needed?	1	2	3	4	5

Please return by fax using the box provided at the top of this page. If you have any other comments, please list them below or call Mr. David McConaughy, Health/Risk Assessment Department, at (804) 444-7575, or DSN 564, extension 434, at any time to discuss your viewpoint. As our customer, your comments and suggestions of how we can improve our services to you are important!