03.01-05/23/94-01108

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

May 23, 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 - OU5
Draft Final Remedial Investigation Report

Dear Ms. Berry:

The Environmental Protection Agency (EPA) has completed its review of the above listed document. Comments are enclosed from the human health review. These comments were not included in the letter dated May 19, 1994.

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

Sincerely,

Gena D. Townsend
Senior Project Manager

Enclosure

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

General Comments

The primary concern with the current document is regarding the selection of remediation levels for groundwater based on a scenario of a construction worker who ingests the groundwater for a total of only 30 days. This approach is inconsistent with that used to derive the MCL/NCWQS values (assumption of ingestion for 365 days per year for 70 years). Additionally, the one-month construction worker exposure to groundwater was not presented as a potential scenario in the baseline risk assessment (OU #5 Remedial Investigation (RI)). It seems logical that if residential consumption is enough of a possibility to apply the Federal and State drinking water standards, the risk-based values should be based on similar assumptions.

Specific Comments

1. Section 2.1.6, pgs 2-8, 2-9; Tables 2-8, 2-9, ES-1.
From where is the construction worker ingestion of groundwater pathway derived? The baseline risk assessment (RI for OU #5) only evaluated potential **residential** ingestion of groundwater. Residential assumption-based remediation levels are consistent with the drinking water standards (Federal and State).

2 Table 2-3.
The Lifetime Health Advisory (LHA) value for barium is **2000** ug/L. The LHA value for phenol is **4000** ug/L.