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DEPARTMENT OF THE NAVY
ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
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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, GA 30365

Re: MCB Camp Lejeune; Response to EPA Region IV Comments on the Draft Interim RI/FS for Operable Unit No. 10 (Site 35)

Dear Ms. Townsend:

This letter addresses your comments on the above referenced project. Attached are Navy/Marine Corps responses to (a) comments prepared by Dynamac, and (b) comments provided on human health aspects. These comments have been incorporated in the Draft Final version of the documents (issued by Baker Environmental, Inc. on June 14, 1994) which you should have already received under separate cover.

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

Sincerely,

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

Attachments

Copy to:
NC DEHNR (Mr. Patrick Watters)
MCB Camp Lejeune (Mr. Neal Paul)
Baker Environmental, Inc. (Mr. Ray Wattras, Mr. Dan Bonk)
Activity Admin Record File

RESPONSE TO COMMENTS SUBMITTED BY
GENA TOWNSEND, USEPA, REGION IV (DYNAMAC)
DRAFT INTERIM REMEDIAL ACTION RI/FS
MCB CAMP LEJEUNE, OPERABLE UNIT #10 (SITE 35)
LETTER DATED MAY 10, 1994

1.0 GENERAL COMMENTS

1. Section 2.0 has been modified to include analytical results. Furthermore, Appendix G has been added to the RI Report which presents analytical data associated with previous investigations.

2. Appendix F has been added to provide the data validation results and Form 1's.

3. In Section 3.2, Page 3-4, the method used for oil and grease (SW846 3rd Edition, Method 9071) is stated.

4. Chemicals were not eliminated from consideration in the baseline risk assessment based on background data. Background data including site-specific data and base-specific data were discussed to provide a benchmark as to the potential range of inorganic concentrations which could occur naturally. Inorganics were evaluated in the baseline risk assessment because background data do not provide sufficient justification for their elimination.

2.0 SPECIFIC COMMENTS

Remedial Investigation

1. Section 2.3, Page 2-3, Paragraph 2

Section 2.0 has been modified to include analytical results. Furthermore, Appendix G has been added to the RI Report which presents analytical data associated with previous investigations.

2. Section 2.4, Page 2-4, Paragraph 1

Text modified as per comment.

3. Section 2.4, Page 2-4, Paragraph 2

Analytical results from the CSA have been added to the RI Report in Appendix G.

4. Section 2.4, Page 2-4, Paragraph 4

Text modified as per comment.

5. Section 3.1, Page 3-1, Paragraph 4

Text has been corrected to read "... SB-33 and SB-34 ...".

6. Section 4.3, Page 4-12, Paragraph 4

The usefulness of analytical results for oil and grease (or TPH) in a baseline risk assessment is limited to discussion, since toxicity values are not published. However, so as not to exclude this data for consideration in the BRA, Section 6.6 (Additional Considerations), discusses the use of a Site Sensitivity Evaluation (SSE) to determine low boiling TPH (i.e., gasoline),

high boiling point TPH (i.e., diesel) and oil and grease initial cleanup levels.

7. Section 5.3, Page 5-2, Paragraph 4

Site 35 data were compared to Eastern United States background concentrations, base-specific background concentrations, and site specific background concentrations to provide a benchmark for potentially natural inorganic concentrations. The discussion concerning the sporadic nature of inorganic occurrence at the site has been omitted.

8. Page 6-3, Paragraph 2, Last Sentence

An explanation of the prevalence criteria used in the BRA has been added to the text in Section 6.2, Page 6-3.

9. Pages 6-6 through 6-9, Tables 6-1 through 6-3

Footnotes that define data qualifiers have been added to these tables.

10. Page 6-7, Paragraph 1

Although the potential for these chemicals to be laboratory contaminants is mentioned, they were not eliminated on this basis. These chemicals were eliminated after comparisons to USEPA Region III RBC values. Text has been modified to reflect this.

Feasibility Study

11. (USEPA 12.), Section 1.2.3.5, page 1-5, Paragraph 3

Text has been modified. Lead was detected in 3 of 11 surface soil samples with a maximum detected concentration of approximately 69 mg/Kg. This maximum detected concentration exceeds both base specific and site specific background but not Eastern US background. Text was also modified to remove the subjective statement concerning sporadic distribution of inorganic constituents.

RESPONSE TO COMMENTS SUBMITTED BY
GENA TOWNSEND, USEPA REGION IV (HUMAN HEALTH ASPECTS)
DRAFT INTERIM REMEDIAL ACTION RI/FS
MCB CAMP LEJEUNE, OPERABLE UNIT #10 (SITE 35)
LETTER DATED MAY 25, 1994

1. Page ES-3, Paragraphs 2 and 3

Text modified as per comment.

2. RI Tables 6-1, 6-2 and 6-3

Tables have been amended to include footnotes identifying the data qualifiers. The residential RBC for bis(2-ethylhexyl) phthalate has been corrected.

3. RI Tables 6-2, 6-3 and 6-5

Because the RfD for dibenzofuran is not on-line in IRIS, dibenzofuran was evaluated quantitatively in the uncertainties section. The HI value associated with dermal contact and ingestion was 0.002 and does not change the conclusions of the baseline risk assessment. The implications associated with the quantitative evaluation of dibenzofuran are presented in Section 6.7.5, Chemicals Not Quantitatively Evaluated.

4. RI Table 6-4

a. The averaging time listed in Table 6-4 for noncarcinogens has been amended to 365 days.

b. The exposure frequency and exposure duration references have been amended to include a reference to "Professional Judgement".

5. RI Table 6 4, Section 2.2.2.2, Page 6-13

Text has been amended to show a surface area of 5300 cm^2/day, to account for the head, hands, lower legs, and arms.

6. RI Table 6 4, Section 6.2.2.3, Page 6-14

Text, table and calculations have been amended to show a respiration rate of 2.5 m^3/hour.

7. RI Table 6-5, Table 6-7, Appendix D

Agreed. Modification of oral toxicity values by Region IV default absorption factors will account for an estimate of absorbed dose. However, because of the uncertainty associated with this practice, modification and effects on the baseline risk assessment are presented in Section 6.7.3. Modification of oral toxicity indices to account for absorption does not affect the conclusions of the baseline risk assessment. Examples are provided in the text to reflect this.

FEASIBILITY STUDY

8. Section 1.2.6, Page 1-7, Paragraph 4

Text modified to present an HI value of 0.05 as per tables 6-7 and 6-9 of the RI.

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