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 From: Supervisory Chemist@EMD4@MCB LEJEUNE  
 Subject: INITIAL RELEASE OF ATSDR'S PUBLIC HEALTH ASSESSMENT  
 Date: Tuesday, October 11, 1994 9:40:30 EDT  
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 The following are my comments of the 8 Sep 1994 Initial Release of ATSDR's Public Health Assessment. My comments deal with two points in the Assessment.

The first point that needs addressing deals with the source of Volatile Organic Compound (VOC) contamination in the Hadnot Point Water System. Throughout the assessment it makes reference to the contamination being the result of the leaking tanks at the Hadnot Point fuel farm and in Table 1 lists the source as "Leaking Underground Lines at the Tank Farm at Site 22". This is not completely accurate. The drinking water well with the highest level (parts per million) of contamination was not located in the vicinity of the fuel farm. Nor was it sampled relative to being located in the vicinity of any NACIP (now IR) site at the time of its discovery.

The following Chronology is provided of the chain of events that identified the sources of contamination for the Hadnot Point Water System. This is taken from my personal notes kept at the time.

Summer 1984 - NACIP study sampled 22 wells identified as potential problems due to their proximity to NACIP sites. Well 651 was not one of the 22 wells.

30 Nov 1984 - MCB Camp Lejeune received results that that Well 602 was positive for benzene. Well 602 was shut down and resampled.

December 1984 - Seven wells in the proximity to the fuel farm serving the Hadnot Point water plant and the raw and treated water at the plant was sampled several times. Well 651 was still not sampled. Four more wells were shut down (Wells: 601, 608, 634, & 637). The treated water showed no contamination when sampling stopped on 19 Dec 1984.

16 Jan 1985 - A command decision to sample all drinking water supply wells at Camp Lejeune was made and initiated. 37 Wells were sampled this date, including well 651.

27 Jan 1985 - Base Chief of Staff's wife smells gasoline in tap water. Fuel leak into the Holcomb Blvd reservoir was discovered. Holcomb Blvd plant was shut down. Distribution system was provided water from (presumed clean) Hadnot Point plant. Hadnot Point water was used to clean Holcomb Blvd plant.

29 Jan 1985 - Sampling was done at Holcomb Blvd plant required by State before returning to operation.

31 Jan 1985 - 29 Jan 1985 results received and showed TCE. Sampling of Holcomb Blvd and Hadnot Point was done and hand carried to State Lab. CLW  
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1 Feb 1985 - Analysis of 31 Jan 1985 showed TCE in both systems.  
Results from 16 Jan 1985 sampling were reported showing  
well 651 with 3.2 ppm (3200 ppb) of TCE.

As the above chronology shows the well with the highest contamination was not related to the fuel farm at all.

The second point that needs to be addressed refers to the quarterly VOC analysis made reference to in the Assessment. Quarterly VOC analysis has only been done on one water system, the Hadnot Point system, and presently isn't being done anywhere. The Safe Drinking Water Act (SDWA) called for quarterly VOC sampling to be done for a year once every three years from 1989-1992. The base complied with the requirements. Hadnot Point's samples showed occasional hits of TCE below detection levels, therefore, the State of North Carolina required that quarterly sampling continue for that system only. The Phase II & V Rules of the SDWA changed the monitoring requirements. VOCs were to be done in 1993, quarterly, then reduced to annual monitoring. After the 1993 run of VOCs for Hadnot Point, which did not show any hits of VOCs, the State rescinded the quarterly monitoring requirement for Hadnot Point. Therefore, the base is NOT presently doing quarterly VOC monitoring in any system. The Assessment recommends quarterly VOC sampling in all systems and semi-annual well sampling for VOCs. This is beyond the requirements of the SDWA and if the command plans to comply with the Assessment's recommendations needs to be tasked to a Division and assigned a project manager. A point that needs clarity from ATSDR relates to the Rifle Range system which now purchases its water from Onslow County. Does ATSDR recommend that VOCs be done quarterly on systems receiving water from off-base sources?

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