

8 June 2001

Commanding General  
(Attn: CG), / (Attn AC/S, EMD)  
Marine Corps Base  
PSC Box 20004  
Camp Lejeune, NC 28542-0004

SUBJ: Water Contamination, MCB, Camp Lejeune

The Chronology of Water Contamination at Marine Corps Base Camp Lejeune from the CLUC water survey internet site makes the following statement: "October 1980 - In compliance with federal guidelines, Camp Lejeune began sampling its water distribution systems for Trihalomethane (THM's). The U.S. Army Environmental Hygiene Agency from Fort McPherson conducted the water testing and discovered unidentified chlorinated hydrocarbons in the Camp Lejeune water system. It is unknown whether the results of these test were reported to Camp Lejeune officials, and it is uncertain if base officials were apprised of the contamination."

This writer is sceptical as to the accuracy of the last sentence. The U.S. Army Environmental Health Agency at Aberdeen Proving Grounds, Maryland discussed with LANTDIVNAVFACENCOM in July 1980 the use of the U.S. AEHA team from Fort McPherson, Georgia to assist the USMC and LANTDIV in developing the THM data base to comply with the U.S. EPA's final regulations on total THM's published in November 1979.

LANTDIV letter 114:WLC 6280 of 29 July 1980 confirmed the McPherson inspection visit to MCB, CLUC and the monitoring program, conducted by U.S. AEHA, was initiated in October 1980 and terminated in December 1981.

Commander, LANTDIV in his letter to CG, MCB/CLUC of 12 Feb 1982 (114:WLC dtd 12 Feb 82) forwarded "Data Analysis of MCB's Camp Lejeune total Trihalomethane Monitoring Program" which summarized data collected during the sampling period and included THM ranges

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for the Rifle Range, Hadnot Point and MCBs, New River. Not only did it provide C6, MCB/CLUC with numeric data, but also provided recommendations as to monitoring procedures and where laboratory services could be found. As COMLAUTDIV told C6, MCBs this information "is forwarded for your information and use."

It should be obvious from the above sequence of events that C6, MCBs was well aware that an Army environmental monitoring team was aboard, had access to the numeric TTHM readings, and a recommendation that the Base initiate contractual arrangement with one of the North Carolina state certified laboratories."

The MCB/CLUC website Chronology used the phrase "Unidentified chlorinated hydrocarbons." The U.S. AEHA team did a field survey and reported the presence of a chlorine induced by-product called a THM and those products once created cannot be removed by normal water treatment processes. The determination of the specific contaminant(s) in the water resulting in a THM requires laboratory analysis. That seems not to have taken place during 1980-1981.

This writer cannot locate any document that shows C6, MCBs ever acted upon the recommendation that laboratory analysis be sought to determine the identity of the contaminant(s) in the CLUC water supply prior to May 1982, some three months after LAUTDIV had advised such action.

The phrasing of the Chronology quote seemingly asserts that MCBs personnel were unaware of the results of the U.S. AEHA monitoring and seemingly left out of the picture that contamination, of unknown origin, was present. The presence of THM's doesn't prove a dangerous contaminant is present, but would give a prudent system manager a warning to determine the nature of the material.

Does MCB, Camp Lejeune continue to assert its position as written in the last sentence of the Chronology cited above?

Based on COMLAUTDIV's report to C6, MCB/CLUC noted earlier it is quite apparent that MCB was made fully aware of the results of the TTHM monitoring at three separate MCB sites

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and given sound advice on the need for laboratory analysis to determine the identity of the reported contaminant. Why it took MCB another five months from the end of the McPherson study to get a laboratory analysis on the reported THM's is unknown.

Does MCB/CLWC have an answer to that delay?

Prior requests for water quality monitoring data for the MCB/CLWC water system operations for periods after 1965 have not been provided on the grounds of non-availability.

I am fully aware that SECNAVINST 5212.5 allows that material documenting results of bacteriological tests for drinking water systems may be destroyed after 5 years and chemical/physical tests after 10 years.

It seems to this officer that once THM's were determined to be present in the potable water system that a prudent system manager, realizing the potential adverse health effects/possible litigation, would have made every effort to maintain as complete a record of system operations so as to provide evidence of competent, professional system management if later challenged.

Obviously the Base Chemist and Facilities Management of that period did not recognize the THM warning signals or the fact that certain records could have been exempted from the broad guidelines of the record disposal orders of that era.

The challenge to the efficacy and safety of the MCB water system is now forthcoming and the inability of the Marine Corps to provide relevant monitoring data does little to support the previously held notion that base residents were being provided safe drinking water in their respective quarters.

Two questions have been posed. I would appreciate a written response to both.

cc: Chairman, Senate Committee on  
Armed Services

CMC (LFA)  
COMLANTDIV  
U.S. NEEHA, Aberdeen, MD

Respectfully Submitted,  
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MAJOR, USMC (Retired)

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