



Agency for Toxic Substances
and Disease Registry
Atlanta, GA 30333

November 24, 2009

Patrick W. Dunne, Rear Admiral (Retired)
Under Secretary for Benefits (M/S 20)
Department of Veteran Affairs
1800 G Street
Washington, D.C. 20420

Dear Admiral Dunne:

The purpose of this letter is three-fold. The Agency for Toxic Substances and Disease Registry (ATSDR) wishes to recognize the recent efforts of the Department of Veteran Affairs (VA) in helping us address the problems faced by veterans exposed to drinking water contaminated with volatile organic compounds (VOCs) at Camp Lejeune. ATSDR also wishes to support the VA's consideration of a presumptive service connection for Camp Lejeune veterans. Finally, ATSDR encourages the VA to use all authoritative reviews in any weight-of-evidence assessment of the association between the chemicals in drinking water at Camp Lejeune and purported health effects.

ATSDR truly appreciates the attendance by Mr. Thomas Kniffen at our October 14, 2009 Camp Lejeune Community Assistance Panel (CAP) meeting. As a result, ATSDR staff and the CAP members became informed of the current VA activities related to Camp Lejeune. They also learned of the VA's policies regarding presumptive service connections. I hope that a VA representative will continue to attend future CAP meetings.

Through our work, we've learned that hundreds of thousands of former service men and women were exposed to high levels of VOCs from contaminated drinking water at Camp Lejeune. We recognize that the scientific literature has associated many of these chemicals with cancer and other health outcomes. We support efforts by the VA to move ahead now to consider how best to serve the large community of veterans who were exposed to contaminated VOC drinking water at Camp Lejeune. The research underway at ATSDR will become available over the next few years. While the results should provide additional useful information for the VA, we encourage you to begin the process for making those decisions as soon as possible.

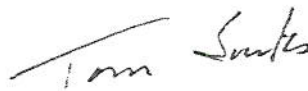
Finally, ATSDR is concerned about using the June 2009 National Research Council (2009 NRC Report) report *Contaminated Water Supplies at Camp Lejeune—Assessing Potential Health Effects* as an exclusive source of information for evaluating the weight-of-evidence for conditions under a presumptive service connection. The report only considered two contaminants (trichloroethylene or tetrachloroethylene) without considering benzene, vinyl chloride, or VOC mixtures at Camp Lejeune. In addition, the report used the lowest

observed adverse effect level (LOAEL) value from animal studies for its "hazard evaluation". The LOAEL was used without consideration of any uncertainty factors.

The weight-of evidence conclusions in the 2009 NRC Report differs from conclusions found in other authoritative reviews. A 2006 NRC report on TCE stated that there was "strong evidence" that TCE causes kidney cancer (1). The recently released EPA draft TCE draft public comment risk assessment states that TCE is a known human carcinogen because it causes kidney cancer (2). The National Toxicology Program's 11th Report on Carcinogens classifies benzene and vinyl chloride as known human carcinogens and trichloroethylene (TCE) and perchloroethylene (PCE) as reasonably anticipated human carcinogens (statements are enclosed) (3). The statement related to TCE is particularly noteworthy. In addition, because the VOCs of concern are considered carcinogens the use of a LOAEL value to assess risk implies known threshold dose values for various cancers, which have not been established.

Thank you for your attention to these matters. Please let us know if there is anything ATSDR can do to support the VA's efforts related to Camp Lejeune.

Sincerely,

A handwritten signature in black ink that reads "Tom Sinks". The signature is written in a cursive, slightly slanted style.

Thomas Sinks, Ph.D.
Deputy Director,
National Center for Environmental Health/
Agency for Toxic Substances and Disease Registry

Footnote:

- 1. National Research Council. 2006. Assessing the Human Health Risks of Trichloroethylene: Key Scientific Issues. National Academies Press, Washington, DC.*
- 2. ATSDR believes that our on-going research will better define the health risks from the exposures at Camp Lejeune. However, our research studies will take several years to complete.*
- 3. Report on Carcinogens, Eleventh Edition; U.S. Department of Health and Human Services, Public Health Service, National Toxicology Program, 2005.*