

02.01-08/30/93-01016

**TELEPHONE MEMORANDUM**

**BETWEEN:** Ray Wattras (Baker) and Gena Townsend (EPA)  
**SUBJECT:** Application of risk assessment and feasibility study when conducting time-critical removal actions.  
**DATE:** August 30, 1993

I called Ms. Townsend to discuss the approach for conducting the baseline risk assessment and feasibility study at Site 2 (Former Day Care Center/Pesticide Storage Area), MCB Camp Lejeune. Since the Department of the Navy/Marine Corps will be conducting a time-critical removal of pesticide-contaminated soil at Site 2, should the project team "assume" that the contaminated soil has been removed when conducting the baseline risk assessment? Ms. Townsend stated that we could not assume that the soil will be removed until the soil is actually removed. Ms. Townsend indicated that after the soil is removed, then the risk assessment can be revised to reflect that fact. I mentioned that this would create re-work late in the RI/FS. She agreed. We then discussed that the baseline risk assessment would show two risks: one including all soil results and one excluding the soil results associated with the removal of soil under the removal action. The risk calculation representing the removal action would be used in the FS to support no further action on soil, if appropriate.

I mentioned to Gena that Baker has been in contact with EPA's risk assessment specialist, Mr. Kevin Koporec, a few weeks ago to obtain guidance on this same subject. I stated that I believe that Kevin indicated that Baker should assume that the soils have been removed. I suggested to Gena that she should talk to Kevin to make sure that we are all in agreement with the approach for conducting the risk assessment and FS. (As a note: the project team discussed this subject with Kevin Koporec again on 9/30/93. They agreed that two risk calculations would be conducted.)

cc: DCShields/PF; DPJoiner; RPWattras; JLMarshall; MDBartman;  
WDTrim bath/JWMentz/PROG F

~~W. L. Berry (Law Div)~~