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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

May 19, 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4WD-FFB

Ms. Linda Berry
Department of the Navy - Atlantic Division
Naval Facilities Engineering Command
Code 1823
Norfolk, Virginia 23511-6287

SUBJ: MCB Camp Lejeune - OU5
Draft Final Remedial Investigation Report

Dear Ms. Berry:

The Environmental Protection Agency (EPA) has completed its review of the above listed document. Comments are enclosed.

If there are any questions or comments, please call me at (404) 347-3016 or voice mail (404) 347-3555, x-6459.

Sincerely,

Gena D. Townsend
Senior Project Manager

Enclosure

cc: Mr. Neal Paul, MCB Camp Lejeune
Mr. Patrick Watters, NCDEHNR

Comments
Draft Final Remedial Investigation

1. Page ES-2, 2nd bullet.
To what particular pesticide(s) does the "less than 100 ug/kg" refer?

2. Page 4-6, paragraph 1.
EPA maintains its disagreement with the wording: "inorganic parameters detected below [State and Federal regulations in groundwater] are assumed to be naturally occurring elements." While naturally occurring chemical concentrations may be considered in setting standards for drinking water (maximum contaminant level, MCL) and EPA may not require remediation of groundwater with levels below the MCL, it is inappropriate to state (even as a "general approximation") that any concentration below the MCL is naturally occurring.

3. Page 6-62, para graph 2, sentence 4.
Edit "potential risk of a chemical risk of a chemical" to read "potential risk from dermal exposure".

4. Table 6-28, Toxicity values.
Since the noncarcinogenic inhalation toxicity values are in units of mg/kg-d, the column would more appropriately read: "inhalation RfD" (not "RfC").

   The carcinogenic inhalation value listed for DDT is the unit risk (units of 1/ug per cu.m.) which makes it 3500-fold in error from the slope factor value (units of 1/mg/kg-d) which should be shown.

5. Appendix O.2.3, Risk Summary Tables.
The inhalation slope factor used for DDT is 3500-fold in error (see comment #4 above) resulting in errors in the calculated risks for this pathway. Please correct these spreadsheets and any affected tables in Section 6.