

State of North Carolina  
Department of Environment,  
Health and Natural Resources  
Division of Solid Waste Management



James B. Hunt, Jr., Governor  
Jonathan B. Howes, Secretary  
William L. Meyer, Director

July 29, 1994

Commander, Atlantic Division  
Naval Facilities Command  
Code 1823-1

Attention: MCB Camp Lejeune, RPM  
Ms. Linda Berry, P. E.  
Norfolk, Virginia 23511-6287

Commanding General

Attention: AC/S, EMD/IRD  
Marine Corps Base  
PSC Box 20004  
Camp Lejeune, NC 28542-0004

RE: Protocol for a Uniform Great Lakes Sport Fish  
Consumption Advisory

Dear Ms. Berry:

The referenced document has been reviewed by the NC Superfund Section with regard to the supplemental aquatic survey conducted for Wallace Creek and Bearhead Creek (Operable Unit 2). Comments are attached to this letter as a memorandum from David Lilley, our Industrial Hygienist, to myself. Please call me if you have any questions about this.

Sincerely,

Patrick Watters  
Environmental Engineer  
NC Superfund Section

Attachment

cc: Neal Paul, MCB Camp Lejeune  
Gena Townsend, US EPA Region IV

July 22, 1994

TO: Patrick Watters  
FROM: David Lilley *DBL*  
RE: Response to questions about the Aquatic Survey for Operable Unit 2, Camp Lejeune, NC

After reviewing the questions posed in your July 14, 1994 memo to me concerning the above mentioned document, I offer the following responses:

1. Q: Is the Great Lakes Study appropriate to justify using lower ingestion rates and exposure frequencies for these aquatic studies?

A: No. Baker Environmental proposes to increase the ingestion rate from the 6.5 g/day to 145 g/meal. This ingestion rate is based on EPA Region IV guidance.

EPA Region IV has set a default exposure frequency of 48 meals/year. This can be adjusted if site-specific information is available. Baker sites a "local sportsman" as the source of their information for estimating an exposure frequency of 24 meals/year. In order for this information to be accepted by the state, a memo must be submitted by Baker including the sportsman's name, the questions asked, the sportsman's experience in fishing the waters in question, the date of the interview, and the source of information the sportsman cited in coming up with these estimates. If the listed information is unavailable, an exposure frequency of 48 meals/year would be appropriate.

2. Q: The need for a health advisory as a result of this aquatic survey?

A: The need for a health advisory cannot be determined until it is agreed what risk is posed by consuming the fish. In determining the risk, 100% of the PCB concentration should be used as the exposure concentration. The risk posed by consuming the fish should be calculated using the EPA approved toxicity factors.

According to the Great Lakes Sport Fish Advisory Task Force (GLSFATF), the PCB levels in Mullet found in the waters in question would put these fish in a grouping where consuming no more than 12 meals/year is advised. Although I do not agree with all the assumptions GLSFATF used to determine it's Model Advisory Groupings, the fact that GLSFATF recommends no more than

12 meals/year should be eaten and Baker states that 24 meals/year are taken from these waterways should raise a red flag. I do not know what contaminant concentrations/risk levels warrant a health advisory for fish in NC. The individual in charge of the agency that issues health advisories should be able to provide that information.