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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

October 7, 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4WD-FFB

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

SUBJ: MCB Camp Lejeune - OU7
Preliminary Conceptual Model
Human Health Risk Assessment

Dear Ms. Saksvig:

The Environmental Protection Agency has completed its review of the above subject document. Comments are enclosed.

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

Sincerely,

A handwritten signature in cursive script that reads "Gena D. Townsend".

Gena D. Townsend
Senior Project Manager

Enclosure

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

Comments

1. Page 1, para 6
Toxicity values (slope factors, RfDs) should be obtained from IRIS or HEAST, rather than relying on the Region III Risk-Based Concentration Table. EPA Region IV Office of Health Assessment should be consulted regarding use of provisional toxicity values (i.e. values not currently on IRIS or HEAST).
2. Table 1 (Exposure Parameters), pgs 2-4
The values listed for "Surface Area, SA" throughout the table should be explained as to what areas of the body are assumed to be exposed.
The values listed for "exposure duration, ED" for the Adult are inconsistent through the table (e.g. ED for Adult under Soil is 24; Adult ED under Sediment is 30). Please address. The "AF" term should be Adherence [not Absorption] Factor. The units for this parameter should be mg/cm^2 .
Surface water parameters- Adequate justification must be included for the Ingestion Rate, IR, and Exposure Time, ET, values assumed. The IR value listed (0.005 L/h) may be acceptable for wading but is too low for swimming; the ET value (2.6 h/d) is appropriate if swimming is assumed to occur (RAGS).
Outdoor Air parameters- the value listed for Exposure Time, ET (0.25 h/d), is inappropriate for either a resident or worker for ambient air exposure.
Fish parameters- The values listed for Ingestion Rate (0.54 kg/d) and Exposure Frequency (250 d/y) result in a fish intake which is extremely high, for all except perhaps subsistence fishermen. Please provide adequate justification (referenced default or site-specific information) for the values used.
3. Page 5, para 4
The text states that "samples...from the northern and southern portions of the site...will be combined for this site and evaluated as a single data set...". Even if "similar operations and processes occurred at both areas", they should not be combined for evaluation of risks unless the same individual could realistically be exposed to both areas. Please clarify.
4. Pages 5, 9
The reviewer is confused by the site names and the description of the sites. Site 1 is called "French Creek Liquids Disposal Area", but the only surface water mentioned is said to be in drainage ditches. The actual "French Creek" is discussed under Site 30 ("Sneads Ferry Road Fuel Tank Sludge Area"), rather than Site 1. Please clarify.