03.01-12/06/95-01617

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

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

December 6, 1995

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

SUBJ: MCB Camp Lejeune
Draft Remedial Investigation
Operable Unit No. 11 - Site 7

Dear Ms. Landman:

The Environmental Protection Agency (EPA) has completed its review of the above subject document. Enclosed are comments from the human health aspects. I apologize for the delay.

If you have 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

cc: Patrick Waters, NCDEHNR
Neal Paul, MCB Camp Lejeune

Comments

1. Section 6.2.1.5 Prevalence, Page 6-4, 1st Paragraph - Provide a reference for this paragraph.

2. Section 6.3.2, Exposure Pathways, Page 6-12 - A trespasser receptor was not considered for the quantitative risk analysis. Since the area of concern is not in a restricted area, the trespasser scenario should be considered for the exposure pathways given. Please modify the document to evaluate the trespasser scenario. EPA recommended default assumptions for a trespasser are adolescent aged 7-16 (10 year exposure duration) with a body weight of 45 kg as representative of this age range. Trespasser exposure frequency should consider site-specific factors such as distance from the site to residences and the attrativeness of the site to the trespasser. (Supplemental Guidance to RAGS: Region 4 Bulletins, Human Health Risk Assessment, Interim, November, 1995, OHA, WD.)

3. Section 6.3.4 Calculation of Chronic Daily Intakes (CDI), Page 6-14 - Table 6-11 through 6-20 are listed as exposure assessment scenarios. However, Table 6-11 is a summary of COPCs and not exposure assessment scenarios. Please make the necessary correction in the text to reflect this.

4. Section 6.3.4 Calculation of Chronic Daily Intakes (CDI), Page 6-18, Future On-Site Resident - Per Region 4 guidance, the Inhalation Rate (IR) for the child has been revised from 10 to 15 meters cubed per day (Region 4 Bulletins). Please make the necessary correction to the document.

5. Section 6.6.5 Compounds Not Quantitatively Evaluated - Of the compounds listed, two of them - phenanthrene and benzo (g,h,i)perylene - can be evaluated using a surrogate value of pyrene and endrin ketone can be evaluated as endrin. In addition, a discussion of the lead concentrations and the reasons as to why it is not discussed quantitatively needs to be given.

6. Section 6.7.1 Total Site Risk - The RfD for manganese has been changed to .024 for evaluation in soil and in water based on the assumption of 5 mgMn/day in the diet (See IRIS file for Mn, updated 11/95). Please make the necessary changes in Table 6-23 as well. Therefore, the amount of noncarcinogenic risk associated with manganese in drinking water will decrease and may fall out as the risk driver. Please make the necessary corrections to reflect the new RfD value for manganese.