6/8/01-3071

Capito, Bonnie P. (EFDLANT)

From: Stevens, Kirk (EFDLANT)
Sent: Monday, June 11, 2001 3:43 PM
To: Capito, Bonnie P. (EFDLANT)
Subject: FW: OU17 ROD and PRAP


OU17 ROD PRAP Lilley.doc


Card for David Lown

For Admin Record

-----Original Message-----
From: David Lown [mailto:David.Lown@ncmail.net]
Sent: Friday, June 08, 2001 2:31 PM
To: Stevens, Kirk (EFDLANT)
Cc: Rick Raines (E-mail); Diane Rossi (E-mail); Gena Townsend (E-mail); Jim Dunn (E-mail); Rich Bonelli (E-mail); Blackwell, Channing (EFDLANT); Thomas Burton
Subject: OU17 ROD and PRAP

Kirk,

Attached are our risk assessor's comments on the OU17 ROD and PRAP. Please contact me or Mr. Lilley if you have any questions. I'm continuing to review these documents and may have additional comments.

Dave

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June 6, 2001

TO: David Lown

FROM: David Lilley

RE: Comments on the "Summary of Site Risks" Sections 1.7, 2.7, and 3.7 of the Revised Draft Record of Decision, OU 17 (Sites 90, 91, and 92) MCB Camp Lejeune, NC May 23, 2001

1. Page 13, Section 1.7.3, second paragraph: It appears as though the conclusion that the chloroform, arsenic, and manganese in Site 90 groundwater pose no human health risks is based on the contaminants not being site-related. This logic is not valid. Also, it should be stated that the well where the tetrachloroethene concentrations exceeded health based standards does pose a human health risk if that water is consumed. Please correct.

2. Page 25, Section 2.7.3, second paragraph: It appears as though the conclusion that the contaminants in Site 91 groundwater pose no human health risks is based on the contaminants not being site-related. This logic is not valid. Please correct.

3. Page 33, second paragraph: It is stated that, based on the qualitative analysis of the data, it is considered unlikely that exposure to Site 92 groundwater would result in adverse human health effects. The qualitative analysis consisted of a comparison of groundwater concentrations to risk based criteria. Two of those concentrations exceeded the risk-based criteria, yet the conclusion is that exposure to the groundwater would probably not result in human health effects. This logic is not valid. Please correct.

DL/dl/word/HumanHealthRA.doc/49

June 6, 2001

TO: David Lown

FROM: David Lilley

RE: Comments on the "Qualitative Risk Assessment" Sections of the Revised Draft Proposed Remedial Action Plan, OU 17 (Sites 90, 91, and 92) MCB Camp Lejeune, NC May, 2001

1. Page 7, third paragraph, last line: It is claimed PCE was detected in one mobile lab sample in excess of the RBC. This is inconsistent with the information presented in the May 23, 2001 version of the ROD. Please correct this inconsistency.

2. Page 7, fourth paragraph: An argument is presented which eliminates arsenic, iron, and manganese as site-related contaminants because concentrations are within background concentration ranges. However, these contaminants were detected in concentrations exceeding the RBCs. The conclusion presented (it is unlikely that exposure to Site 90 groundwater would result in adverse human health effects) is not supported by the discussion in this section. Just because sample concentrations are within background concentration ranges does not mean potential health effects do not exist if the groundwater is used. Please correct.

3. Page 12, Qualitative Risk Assessment: In the Revised Draft of the ROD (May 23, 2001) it is stated that chloroform was detected in 20/26 groundwater samples analyzed by the mobile lab and 1/9 samples analyzed by the fixed base lab. It is further stated that all positively detected concentrations exceeded the RBC and NCWQS. The only other statement made in the ROD or this document concerning chloroform is that it is not thought to be site related. The conclusion given at the end of this section is that it is unlikely that adverse human health effects would occur from exposure to Site 91 groundwater. Just because the contaminant is not believed to be site related does not mean potential health effects do not exist if the groundwater is used. Please correct.

4. Page 14: Qualitative Risk Assessment, second paragraph, last line: Recommend inserting the words "sampling equipment" before the words "decontamination procedures".

5. Page 15: In the first paragraph, it is stated that all positively detected concentrations of chloroform exceeded the tap water RBC. In the second paragraph on this page, it is stated that, based on the qualitative analysis of the date, it is unlikely that exposure to Site 92 groundwater would cause adverse human health effects. The qualitative analysis consisted of a comparison of groundwater concentrations to risk based criteria, where it was found that all positively detected concentrations of chloroform exceeded the tap water RBC. This is not valid logic. Please correct.