

M67001.AR.006804  
MCB CAMP LEJUENE  
5090.3a

LETTER REGARDING SUPPORT REQUEST FOR CASE CONTROL STUDY OF CHILDREN  
BORN TO ON-BASE INDIVIDUALS 1968-1985 MCB CAMP LEJEUNE NC  
1/12/2006  
DEPARTMENT OF THE NAVY



DEPARTMENT OF THE NAVY  
HEADQUARTERS UNITED STATES MARINE CORPS  
2 NAVY ANNEX  
WASHINGTON, DC 20380-1775

IN REPLY REFER TO:

5090  
LFL/KK548

JAN 14 2006

Howard Frumkin, M.D., Dr.P.H.  
Director, National Center for Environmental  
Health/Agency for Toxic Substances and  
Disease Registry  
1600 Clifton Road, Mail Stop E-28  
Atlanta, Georgia 30333

Dear Dr. Frumkin,

This letter is in response to your letter of December 9, 2005, seeking my assistance in helping your agency complete its case-control study of children born to mothers who were pregnant while living on base at Camp Lejeune between 1968-1985.

The Marine Corps shares your goal of ensuring the timely completion and scientific accuracy of your study. Toward that end, the Marine Corps has made every effort to provide your staff complete access to all information that may be related to water quality at Camp Lejeune. Upon receiving your letter of December 9, we began a comprehensive review of our response to your agency's requests for information. That review disclosed no instance where information known to be in our possession was withheld. To the contrary, our review confirms that we have made a full and timely disclosure of all known water records. Because I believe this issue to be important to the maintenance of a cooperative relationship between our agencies, I am providing an enclosure that details the Marine Corps' response to ATSDR's information requests. We remain committed to providing you timely and accurate information and documents. I have identified Ms. Kelly Dreyer as my single point of contact for data requests to ensure that you receive information in a timely manner. I request that you also identify a single point of contact to prioritize requests and track responses.

Finally, your December 9 letter asks that the Marine Corps identify and provide documents that are relevant to or useful to the study, and not merely respond to ATSDR's requests for information. While we appreciate the complexities of conducting an epidemiological study and constructing a historic water

model, the Marine Corps does not have the subject matter expertise to properly determine the relevance of documents in all cases. We will certainly attempt to comply with this request, however in doing so we are mindful that ATSDR is both the agency charged under CERCLA with conducting health studies and the agency which possesses the subject matter expertise in this complex scientific area - the Marine Corps plays only a support role by providing data and facilitating ATSDR activities.

I hope this letter satisfactorily addresses your concerns and paves a way ahead for a timely completion of your study on this important matter.

Sincerely,



R. S. KRAMLICH  
Lieutenant General, USMC  
Deputy Commandant  
Installations and Logistics

Enclosure:

(1) ATSDR information and data needs

Copy to:

Director, DHAC/ATSDR  
Director, DHS/ATSDR  
Washington Office, ATSDR  
OGC/CDC  
Mike White, DOD  
Frank Bove, DHS/ATSDR  
Morris Maslia, DHAC/ATSDR  
Ms. Bonnie Anderson, GAO

Comments on Information and Data Needed by ATSDR to Complete  
Water Modeling Activities in Support of the Current  
Epidemiologic Case-Control Study

1. Camp Lejeune Water Documents: All documents designated as "CLW" by Camp Lejeune and any software developed by or for Camp Lejeune Environmental Management Department (EMD) to assist with searching or locating "CLW" documents by key words, topics, dates, etc.

Response: "All CLW documents" were requested in a 1 December 2005 e-mail from ATSDR staff to Camp Lejeune staff. Camp Lejeune staff understands the CLW documents referred to are in the "Camp Lejeune Contaminated Water Document Database" (CLW Database). ATSDR and the general public has had access to many of these documents via the HQMC website since 2001. Other CLW documents have been provided to ATSDR, as requested. For example, see 4 below. The CLW database was copied to a CD and sent to ATSDR staff five days after the initial request (6 December 2005).

2. Camp Lejeune EMD Summary Files: All files developed by or for Camp Lejeune EMD whose purpose is to aggregate and summarize data that may relate to ATSDR water modeling analyses. These may be such files as MS Excel or MS ACCESS files describing water supply well information, water-quality sample data, etc.

Response: Camp Lejeune staff understands this request is referring to a TCE/PCE sample result summary sheet that was created by the MCB Camp Lejeune Environmental Management Division staff. This information was compiled expressly to assist ATSDR with their water model. The spreadsheet was recently updated based on requests made by the GAO. This information was requested by ATSDR in a 1 December 2005 e-mail to MCB Camp Lejeune staff. The information was sent to ATSDR staff five days after the initial request (6 December 2005).

3. Historical Water System Maps: All maps, map files, spatial data layers, and associated attribute information relating historical changes in Camp Lejeune water systems for years 1941-2000.

Response: The compilation of maps of water system changes at Camp Lejeune from 1941 - 2000 referred to in this request are recently-created summary maps of changes in water system service areas from 1941 - 2000. Camp Lejeune staff shared hard copies of the compilation maps with ATSDR staff on 7 November 2005. ATSDR staff indicated that they would like an electronic copy of

Comments on Information and Data Needed by ATSDR to Complete  
Water Modeling Activities in Support of the Current  
Epidemiologic Case-Control Study

the maps as well as the data used to create the maps. Electronic copies of these maps were provided to the ATSDR staff member the same day (7 November 2005). The map files, spatial data layers, and associated attribute information relating historical changes were sent to ATSDR staff on 14 December 2005.

Additionally, the USMC expended approximately \$538,000 in 2004 to "reverse engineer" Camp Lejeune's water system infrastructure (1968 - 1985) for the sole purpose of assisting ATSDR in their water modeling effort. This was a meticulous effort where USMC contractors reviewed as-built drawings, reconstructed the Base water systems pipe-by-pipe and year-by-year, developed GIS data, and created maps. The information, GIS data, and maps created under this contract were provided to ATSDR in September of 2004.

4. JTC Environmental Consultants, Inc., Reports: Laboratory reports from sampling conducted by Camp Lejeune and analyses performed by contract laboratory, JTC Environmental Consultants. These reports were submitted to U.S. Environmental Protection Agency, Region IV, by letter dated 25 April 1986. (Request for these data have been made previously on several occasions to Camp Lejeune and headquarters EMD staff)

| <u>JTC Report No.</u> | <u>Date of Report</u> |
|-----------------------|-----------------------|
| 67                    | 5/2/1985              |
| 99                    | 7/19/1985             |
| 130                   | 9/12/1985             |
| 131                   | 9/18/1985             |
| 153                   | 10/3/1985             |
| 157                   | 10/11/1985            |
| 161                   | 10/17/1985            |
| 166                   | 10/25/1985            |
| 175                   | 11/7/1985             |
| 181                   | 11/14/1985            |
| 183                   | 11/27/1985            |
| 187                   | 11/27/1985            |
| 192                   | 12/9/1985             |
| 199                   | 12/18/1985            |
| 201                   | 12/31/1985            |
| 208                   | 1/2/1986              |
| 209                   | 1/2/1986              |
| 214                   | 1/21/1986             |
| 218                   | 1/27/1986             |
| 221                   | 1/30/1986             |
| 226                   | 2/20/1986             |

Comments on Information and Data Needed by ATSDR to Complete  
Water Modeling Activities in Support of the Current  
Epidemiologic Case-Control Study

|             |    |    |                                      |
|-------------|----|----|--------------------------------------|
| 11          | 80 | -- | Paradise Point-golf maintenance area |
| 12          | 3  | 3  | Old creosote site                    |
| 15          | 88 | -- | Bldg. #25                            |
| Pre-RI site | 84 | -- | Bldg. 45 area                        |
| Pre-RI site | 85 | -- | Camp Johnson battery dump            |
| Pre-RI site | 4  | -- | Sawmill Road dump                    |
| Pre-RI site | 5  | -- | Piney Green Road                     |
| Pre-RI site | 8  | -- | Flammable storage warehouse-TP#451   |
| Pre-RI site | 8  | -- | Flammable storage warehouse-TP#452   |
| Pre-RI site | 10 | -- | Original base dump                   |
| Pre-RI site | 11 | -- | Pest control shop                    |
| Pre-RI site | 12 | -- | Golf course construction dump Site   |
| Pre-RI site | 15 | -- | Montford Point dump                  |
| Pre-RI site | 18 | -- | Watkins Village site                 |
| Pre-RI site | 19 | -- | Naval Research lab dump              |
| Pre-RI site | 20 | -- | Naval Research lab incinerator       |
| Pre-RI site | 22 | -- | Industrial area tank farm            |
| Pre-RI site | 23 | -- | Roads and grounds, Bldg. 1105        |
| Pre-RI site | 25 | -- | Base incinerator                     |
| Pre-RI site | 26 | -- | Coal storage area                    |
| Pre-RI site | 27 | -- | Naval Hospital area                  |
| Pre-RI site | 29 | -- | Base sanitary landfill               |
| Pre-RI site | 32 | -- | French Creek                         |

Response: The information listed above pertains to the Camp Lejeune CERCLA program. This information was requested via a 9 May 2005 e-mail and has been accessible via the Camp Lejeune CERCLA Administrative Record since the early 1990s. Your staff reviewed the documents contained in the Administrative Record to compile their Public Health Assessment (PHA) that was completed in 1997. As you may also be aware, under CERCLA, RI/FS data or any information incorporated into a decision document for a CERCLA site must be available/accessible to the public. The information, now accessible online, contains thousands of records related to the Camp Lejeune CERCLA program. Because of its size, Camp Lejeune no longer keeps a paper copy of the complete CERCLA Administrative Record on base. The Naval Facilities Engineering Command library has a complete set of these records in both electronic and paper form. The records can be searched by site number, operable unit (OU), or text string. The staff at Camp Lejeune and the contractor that

Comments on Information and Data Needed by ATSDR to Complete  
Water Modeling Activities in Support of the Current  
Epidemiologic Case-Control Study

maintains the website with the Administrative Record are happy to assist any ATSDR personnel with searching the Camp Lejeune CERCLA database.

Contract Information: Information and data related to various contracts. (Request for these data have been made previously on several occasions to Camp Lejeune and headquarters EMD staff)

| <u>Contract Number</u> | <u>Remarks</u>   |
|------------------------|--|
| N62470-87-C-9266       | Well at holding pond<br>Sprinkler system for golf course |
| N62470-93-C-5318       | Well numbers 1, 3, 4, 5, 6, and 8<br>S. H. Barner, Inc.  |

Response: This information was requested via a 9 May 2005 e-mail. While not stated in the list of requested data attached to the e-mail, the body of the e-mail indicated that ATSDR's support contractor wanted coordinates/locations of wells installed under the contracts listed. During its review of the list, the Camp Lejeune staff discovered that the contracts listed had routinely been destroyed long before. During a 7 November 2005 visit to Camp Lejeune by ATSDR staff and a subsequent teleconference that same day between Camp Lejeune, ATSDR and an ATSDR contractor, ATSDR reiterated that it wanted coordinates/locations of wells and not contract information. Camp Lejeune staff gathered and provided this information to the ATSDR contractor via e-mails on 5 and 6 December 2005.

6. ATSDR's need for cooperation from and coordination with the future document search at Camp Lejeune.

Response: As your staff is aware, there have been numerous searches for documents relating to Camp Lejeune's water systems over the years. While the Marine Corps believes that all of the documents have been located, the recent discovery of a couple of related documents (that were provided to your staff) has caused us to convene another search to ensure none were overlooked. Your staff participated in the kick-off brief on November 7, 2005 regarding this upcoming base-wide document search. They were provided a copy of the draft building and document selection criteria and methodology and were welcomed to provide comments. During the briefing, your staff offered comments to the contractor. Please note this search has not commenced and a

Comments on Information and Data Needed by ATSDR to Complete  
Water Modeling Activities in Support of the Current  
Epidemiologic Case-Control Study

schedule is yet to be determined. As stated above, we will share the discovery of any relevant documentation with your staff so that they can review it and determine if it is relevant to their study.