DEPARTMENT OF THE NAVY
NAVY ENVIRONMENTAL HEALTH CENTER
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From: Commanding Officer, Navy Environmental Health Center
To: Commanding Officer, Atlantic Division, Naval Facilities Engineering Command (Maritza Montegross), 1510 Gilbert Street, Norfolk, VA 23511-2699

Subj: MEDICAL REVIEW OF DRAFT ENGINEERING EVALUATION/COST ANALYSIS SITE 85, THE CAMP JOHNSON BATTERY DUMP, MARINE CORPS BASE, CAMP LEJEUNE, NC

Ref: (a) Baker Environmental, Inc. Transmittal Ltr of 9 Oct 98

Encl: (1) Subject Medical Review
(2) Medical/Health Comments Survey

1. Per reference (a), we have completed a review of the subject document. We are forwarding our comments to you as enclosure (1).

2. Please complete and return enclosure (2). Your comments are needed to continually improve our services to you.

2. We are available to discuss the enclosed information by telephone with you and, if you desire, with you and your contractor. If you require additional assistance, please call Mr. Gene Astley at (757) 462-5541 or Mr. David McConaughy at (757) 462-5557. The DSN prefix is 253. The e-mail addresses are: astleyk@nehc.med.navy.mil and mcconaughyd@nehc.med.navy.mil.

P. B. GILLOOLY
By direction

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MEDICAL REVIEW OF
DRAFT ENGINEERING EVALUATION/COST ANALYSIS
SITE 85-THE CAMP JOHNSON BATTERY DUMP
MARINE CORPS BASE CAMP LEJEUNE, NORTH CAROLINA

Ref: (a) Guidance on Conducting Non-Time-Critical Removal Actions Under CERCLA, August 1993 (EPA540-R-93-057)

General Comment: The document entitled "Draft Engineering Evaluation/Cost Analysis Site 85-The Camp Johnson Battery Dump, Marine Corps Base, Camp Lejeune, North Carolina" dated 9 October 1998 was provided to the Navy Environmental Health Center for review on 20 October 1998. The document was prepared for the Atlantic Division, Naval Facilities Engineering Command by Baker Environmental, Inc.

Review Comments and Recommendations:

1. Page 6-4, Section 6.2.1, "Description of Alternative"
   Pages 3-8 through 3-9, Section 3.1.1.2, "Selection of Chemicals of Potential Concern"

Comments:

a. The text states on page 6-4 that "However, it should be noted that the battery piles are difficult to see at the site and more may be found during the removal action."

b. The text states on pages 3-8 through 3-9 that five surface, five subsurface and three groundwater samples were taken.

c. Statements in the text indicate that the contaminant sampling was limited and probably all the battery piles were not located at the site.

Recommendation: Consideration should be given to conducting a more detailed investigation of the site.

2. Page 6-6, Section 6.2.3, "Technical Feasibility"
   Page 6-10, Section 6.3.3, "Technical Feasibility"

Comments:

a. Reference (a), page 39, section 2.6 states the short-term effectiveness criterion should address any risk to the affected community that results from implementation of the proposed action, whether from air quality impacts, fugitive dusts, transportation of hazardous materials or other sources. This factor should also assess any threat to site workers and the effectiveness and reliability of protective measures that would be taken.

b. The risk to the affected community and to site workers was not adequately addressed in the text.

Recommendation: The text should explain in more detail the risk from remedial activities to the affected community and to site workers.