

Raines GS12 Rick H

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Sent: Friday, August 25, 2000 5:46 PM
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Subject: CNN'S INTEREST IN THE ATSDR'S STUDY

Greetings all,

I spoke with Tina Ver, CNN Atlanta, just before lunch today. She wants to know why we (ATSDR, USMC) are just now letting people know about the contamination issue and doing a study. I believe the underlying question is 'why are we telling people about this now vice back in 1985?' She's talked with some of our more disgruntled prior Marines/family members and seems likely to pursue this as a feature.

The good news story is our proactivity and the cooperation with ATSDR. Some tough questions to answer, though. I see several answers (or several parts to the single answer) to this question and appreciate input.

She also asked about what and when info was released to the public/media. I've got some of this in the PAG and copies of THE GLOBE's articles. Anyone know of any other releases/articles/notices?

She asked about where the contamination came from and how it got in the water, what the Marines were doing at the time, clean-up efforts, etc. The PAG should answer most of that too.

She also asked a legal question. I made sure she had the number to OJAG. She asked if there's a 'statute of limitations' on litigation against the government in this case (or other's like it).

If anyone has input, I'm open. I'll be reviewing the info this weekend and working more on a release regarding the MARADMIN for the base/station newspapers. I'm recommending a carefully-planned package of info (documents, articles, the likes of which we sent to Maj. Townsend) be sent within the next two weeks that shows Tina what happened and how we responded. Also recommend we lead with the potential benefits of the ATSDR's study, the Marine Corps' support of the study and the USMC's proactivity in closing wells and releasing information to those who needed it.

Speaking of Maj. Townsend (USMC, ret), I'm sure Tina's talked to him and other disgruntled prior Marines and family members. I also just received another letter from the Major. Haven't read it yet (this weekend), but I know it contains more complaints about how we're not going global with our information about the contamination. I personally believe Maj. Townsend is more concerned with public information and a formal apology than with litigation for monetary compensation, so I think he'll play a prominent role in CNN's coverage.

R/S - Capt. Crouch

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Summary of Tina Ver's comments and questions, and my responses to her questions:

(1) I'm having some trouble understanding the overlap between Superfund clean up and where Installation Restoration [IR] cleanup occurs. Can you explain the differences/overlap to me?

I explained that the 1980 CERCLA law was initially directed at the private sector. That CERCLA required businesses to look at their historical records, their operations, and determine whether any of their past or current practices could have resulted in potential "hazardous waste sites". And that based on historical records reviews, if businesses had any indication that hazardous wastes may have been created, that they may then have conducted limited soil and groundwater sampling. Then all that preliminary information was sent to the EPA and the EPA determined, according to their own scoring criteria, if any of the sites should be considered hazardous waste sites; that EPA also determined if sites should be listed on the National Priorities List; and that a Superfund cleanup was the investigation and clean up of sites in the private sector. It was called "Superfund" because the 1986 amendments to CERCLA are called the "Superfund Amendments and Reauthorization Act (SARA).

Then, an Executive Order was issued that required Federal Facilities to meet the same requirements as the private sector. The investigation and clean up of sites that are within the boundaries of Federal Facilities are called Installation Restoration cleanups because the IR program is the program under which environmental investigations and cleanups of Federal facilities are conducted.

The boundaries of Federal facilities, or Federal sites, encompass the areas falling inside the "fence line" of the facility. Areas within the facility's boundaries that have been identified as potential hazardous waste site areas are called "Operable Units," under the IR program terminology. Typically, the Operable Units are a small proportion of the overall acreage of a Federal facility. Clean ups of these areas are considered "IR clean ups."

So "Superfund" cleanups are private-sector cleanups and cleanups of sites inside the boundaries of Federal facilities are considered "IR" cleanups.

Outside the fence-line of Camp Lejeune, a private sector business, the ABC Cleaners, constructed a business establishment. This business was established in the late 1950's. Reportedly, the ABC Cleaners facility did not dispose of perchlorethylene (PCE), a solvent used in the dry cleaning industry, correctly. The disposal system was apparently incorrectly designed or configured, resulting in PCE being drained to the soil, instead of to a water treatment facility. Over time, the PCE migrated through the soil towards the Tarawa Housing area, located inside the fence-line of Camp Lejeune. The investigation and cleanup of the ABC Cleaners facility is a Superfund cleanup, because it is a private sector business. The PCE contamination migrated from outside of the base towards an

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on-base housing area. So the former residents of the Tarawa Terrace housing area are the impacted population. But the contamination source is the ABC Cleaners.

(2) Another thing that I am not clear on is locations. I have some maps that I downloaded from the Internet. They are not that good - clearly there are Xeroxed copies. Besides the Tarawa Terrace area there is another area called Hadnot Point?

Yes, the Hadnot Point area is another housing area located on Camp Lejeune.

(3) Is there a different source of contamination for the water distribution system for the Hadnot Point area?

Yes, the Hadnot Point area was not impacted by the ABC Cleaners site.

(4) Then what is the source of contamination for the Hadnot Point area? Is the TCE contamination in the water system there from an on-base source?

There are some Operable Units located closer to the Hadnot Point area, but I don't know if any of those sites have been identified as potential sources of the TCE contamination that was detected in that water system. I think that is a question that should be answered by Camp Lejeune. The environmental engineering staff at Camp Lejeune are the people that conduct the investigations and clean ups for the Operable Units on Camp Lejeune. I can answer questions about the health study.

(5) But isn't the Hadnot Point area within the purview of the health study? Weren't people living in that area exposed to TCE?

Yes, the ATSDR health survey is of all former residents of Camp Lejeune that had children while they were living at Camp Lejeune or that were pregnant while they were living at Camp Lejeune, but gave birth elsewhere, after leaving Camp Lejeune. This includes both the Tarawa Terrace area and the Hadnot Point area, as well as all of the other housing areas on Camp Lejeune. We want everyone eligible to participate in the survey to participate, whether they were living in the potentially exposed areas or not, and whether they and their family members are in perfect health or have had any health problems.

ATSDR wants to conduct this study of former Camp Lejeune residents because of the results of the Woburn, Massachusetts study. Are you familiar with that study? (Yes). Well, in that study an association was found between exposure to TCE and childhood leukemia, and ATSDR wants to conduct another study to see if the results also indicate an association. The Woburn study is the first, the only study so far, that has reported this association, and ATSDR wants to conduct another study to see if this association exists. Since former Camp Lejeune residents are a fairly large population, ATSDR thinks this will be a good population to survey.

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(6) The Woburn study found a causal relationship? [between TCE exposure and childhood leukemia]?

No. The Woburn study found an association. An association is not the same thing as a cause-effect relationship. An association means that there was a statistical significance, but it does not mean that any cause-and-effect relationship has been established.

(7) I have some questions about the number of people in the study. I think the number that ATSDR came up with is 16,500. Do you know how that number was derived? Also, the ATSDR health study proposal indicates that ATSDR needs to locate 80% of the population, to be statistically significant, can you tell me why?

Yes. As you know, ATSDR previously conducted a health study for Camp Lejeune. They wanted to study adverse pregnancy outcomes, looking at mean birth weights and size-for-gestational age, as related to VOC exposure. ATSDR worked with the Family Housing office on Camp Lejeune, to find the names of people that had lived in housing areas on Camp Lejeune between 1968 and 1985. ATSDR also worked with the Naval Hospital at Camp Lejeune to find birth records for anyone who had given birth while at Camp Lejeune. They also went to the Onslow County hospital, to get birth records for those who have deliveries in the county hospital. From these records, ATSDR was able to determine that there were 12,423 births to personnel who lived at Camp Lejeune between 1968 and 1985.

That is how the approximate number of 12,500 births was derived. Then you need to consider that there were people that may have been pregnant while they were living at Camp Lejeune, but moved somewhere else before giving birth. For example, they could have been living at Camp Lejeune for three months of their pregnancy, and then have been transferred to another base, where they gave birth. ATSDR has estimated that there may be up to 4000 such births. We want these people to be a part of the health survey too. It may be harder to locate these people, because they would not be on the list that ATSDR was able to develop, based on the birth records from the Naval Hospital at Camp Lejeune and the Onslow County hospital. Also, it may be more difficult for someone who gave birth at some other place to recognize that they should be included in the health study if were pregnant for some period of time while they were at Camp Lejeune.

So the retrospective cohort study that ATSDR wants to conduct would include the 12,500 births for people living at Camp Lejeune, and the estimated 4000 births to people that were pregnant while at Camp Lejeune, but gave birth elsewhere.

What did you call it? A retrospective cohort study? Could you explain what that means?

Yes. I didn't mean to use technical language. Retrospective means that the study is looking at the past, rather than the future. If an industrial accident or spill would happen today, you could study the population that was exposed in the accident or spill, and track their health status over time, in the coming years. However, when you are looking at

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exposure that occurred in the past, and the past health status of people, it is a retrospective ("looking-back") study.

Cohort is the epidemiological word for the group that is going to be evaluated. For the Camp Lejeune study the cohort is comprised of the former residents who gave birth, and/or were pregnant while they were at Camp Lejeune. The study group includes people that were living in the impacted housing areas as well as the un-impacted housing areas.

[Note to all: No, I shouldn't have used scientific jargon. I am not relaying this part of the conversation to point out my mistakes. Rather, since I did use the terminology, I think you all should know what a "retrospective cohort study" is, in case someone else is asked that question.]

(8) ATSDR says that they need to locate 80% of the population, for the study to be statistically significant. I know you are trying to locate the women, but have only found about 1/3 of the women.

The need to locate 80% of the study population is related to the fact that you need to have a large enough population to study to determine if there is any increased incidence of some diseases or health impacts. A number of childhood diseases occur at fairly low rates. If the overall U.S. rate of occurrence is on the order of 1 in 100,000 per year, you would need to study a large population to see if there was increased incidence. Childhood leukemia, that was evaluated in the Woburn study, is a childhood disease that occurs at low rates in the overall population. Based on an estimated study population of 16,500, ATSDR has derived the figure of 80% response is needed for the study to be statistically significant.

Other Questions:

The write-up of my responses is taking longer than I thought it would. We spoke for about 40 minutes, from approximately 2:30 to 3:15 p.m. Then I phoned Kelly to let her know that Tina had called me, and discussed some of the questions and my responses. Below are abbreviated versions of my responses:

(9) Why is ATSDR looking at residents between 1968 and 1985?

[The assumption about the ABC Cleaners had been in operation since the late 1950's and that the contamination may have existed all along. So wanted to go as far back as 1968.]

(10) I understand some letters have already been sent out about the health survey. When did that start?

[September 17, is my understanding.] She stated that was her understanding, too.

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(11) A lot of the individuals who have talked with me say they really want this survey to be conducted.

Well, the survey is being conducted. It is in progress. We are fully encouraging participation.

(12) Has there been a problem locating people? How are you trying to locate people? Do you have SSNs for former residents?

ATSDR got the initial list of former residents from the Family Housing Office at Camp Lejeune and the NAVHOSP and Onslow County hospital. But those records did not provide information like SSNs and last known addresses for all the former residents of Camp Lejeune that would be participants in this study. The above records provided this type of information for about 5000 people. The Marine Corps has also assisted ATSDR by contacting the DMDC and trying to get a more complete list of SSNs to match the list of former residents of Camp Lejeune. Not all the names could be matched, there are duplicate names, etc. One of the problems is that prior to 1970-1972 service personnel had military service numbers, vice SSNs. There are also issues of Privacy Act information, regarding release of information for dependents of military personnel. You need to contact Kelly Dyer to get specific information about how the Marine Corps contacted DMDC to assist ATSDR with trying to match up names and SSNs.

Tina asked me if it was 1970 or 1972, when service members started using SSNs as their military ID numbers.

I can't tell you that, for certain. Understand that I am answering your questions from memory, and do not have any of that information in front of me. I referred Tina to Kelly to answer that questions.

(13) I am trying to get the timelines to match up. Can you tell me if they started looking at ABC Cleaners, conducting a Superfund investigation, after discovery of the PCE in the water distribution system of Tarawa Terrace? When did they discover the contaminants in the water distribution systems at Camp Lejeune. Was that in 1980? When were the contaminated wells discovered.

[NOTE: This question is out of order – should probably be #3. I have grouped several questions together that were asked early on.]

I responded that in general, the discovery of TCE and PCE in some of the drinking water systems at Camp Lejeune was in the "1980 time-frame", but that I would not venture to provide exact dates. That question should be answered by Camp Lejeune.

In general, the discovery of these compounds occurred in the 1980 time frame, because that was when the monitoring system for the Camp Lejeune water distribution system, was changed, in that the analytical methods to test the water were changed. I noted that the 1980 time-frame was the same time-frame in which the CERCLA law was enacted,

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and that in that time-frame, new requirements for water analysis were being disseminated by EPA.

(14) When did ATSDR start looking at the contamination problem in Camp Lejeune water distribution system?

When they began reviewing environmental data to develop the Public Health Assessment (PHA) for Camp Lejeune. I didn't provide a specific date, but noted that ATSDR looks at the whole facility, not just the hazardous waste sites located on a facility, to develop the PHA. They look at things like water monitoring reports, in addition to reviewing environmental sampling results such as soil and ground-water. In the process of reviewing the water monitoring reports for Camp Lejeune, ATSDR recognized that VOCS had been detected in the 1980 time-frame.

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