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CTO-303/ARF

**NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES**

DIVISION OF WASTE MANAGEMENT



June 29, 1998



JAMES B. HUNT JR.
GOVERNOR

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Commander, Atlantic Division
Naval Facilities Engineering Command
Code 1823
Attention: MCB Camp Lejeune, RPM
Ms. Maritza L. Montegross
Norfolk, Virginia 23511-6287

Commanding General
Attention: AC/S, EMD/IRD
Marine Corps Base
PSC Box 20004
Camp Lejeune, NC 28542-0004

RE: NC Superfund Section Comments
Draft Record of Decision
OU06 (Sites 36, 43, 44, 54, and 86)
Marine Corps Base, Camp Lejeune

Dear Ms. Montegross:

The referenced document has been received and reviewed by the North Carolina Superfund Section and our comments are attached. Please call me at (919) 733-2801, extension 278 if you have any questions.

Sincerely,

David J. Lown, LG, PE
Geological Engineer
Superfund Section

Attachments

cc: Gena Townsend, US EPA Region IV
Neal Paul, MCB Camp Lejeune
Diane Rossi, DENR - Wilmington Regional Office

ATTACHMENT

NC Superfund Section Comments
Draft Record of Decision
OU06 (Sites 36, 43, 44, 54, and 86)
Marine Corps Base, Camp Lejeune

1. DECLARATION, Page ix. The components of the remedies should include the following:
 - The natural attenuation remedy will be tested and a monitoring program designed. If monitoring shows that natural attenuation is not successful, the remedy will be re-evaluated.
 - Institutional controls will include recordation of a notice at the Onslow County courthouse and a plan for deed restrictions in the event the property leaves Camp Lejeune's control.
2. Pages 12 and 13, Compliance with ARARs. Before natural attenuation can be used, Subparagraph (1) of NCAC 15A Subchapter 2L lists the criteria that must be met. Among these are the following:
 - (1) All sources of contamination and free product must be removed or controlled.
 - (2) The contaminants must have the capacity to degrade or attenuate under site-specific conditions.
 - (3) Time and direction of contaminant travel can be predicted with reasonable certainty.
 - (4) Contaminant migration will not result in any violation of groundwater standards at any existing or foreseeable receptor.
 - (5) Migration of contaminants onto adjacent properties either does not occur or is allowed only with the property owner's written consent.
 - (6) Groundwater discharge will not result in the violation of a surface water quality standards specified in 15A NCAC 2B.0200, another State ARAR for the Site.
 - (7) A groundwater monitoring program sufficient to track migration, degradation and attenuation of contaminants and contaminant byproducts will be implemented.

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3. Page 33, Subsection Overall Protection of Human Health and the Environment, Second Paragraph. If the Natural Attenuation is not monitored, there is no way to determine if it is continuing.
4. Page 33, Subsection Compliance with ARARs. See comment 2.
5. Page 45, Subsection Compliance with ARARs. See comment 2.
6. Page 48, Section 7.0 SELECTED REMEDIES Institutional controls are an important part of the remedy at Sites 36, 54, and 86.
7. Page 48, Sections 7.1.1, 7.1.4, and 7.1.5. The Preferred Alternative for Sites 36, 54, and 86. While there is some evidence that these plumes are naturally attenuating, the degradation of the contaminants still needs to be confirmed. During the Remedial Design, the natural attenuation of the plumes will be characterized and a plan developed for evaluating the effectiveness of natural attenuation. The characterization of the plume will include the evaluation described in the Air Force *Technical Protocol for Evaluating Natural Attenuation of Chlorinated Solvents in Groundwater* and determination of apparent biodegradation rate constants. Modeling will be used to predict how long it will take for the plumes to naturally degrade. A monitoring plan will be designed to test the predictions. If the monitoring shows that any of the plumes is increasing in size, or impacting receptors or surface waters, then the remedial action for the plume will be reevaluated.
8. Page 57, Section 8.2 Compliance with Applicable or Relevant and Appropriate Requirements. A list of the ARARs that apply to this remedial option should be included. The following State ARAR should be included with the:

§ 130A-130.1. Identification, inventory, and monitoring of inactive hazardous substance or waste disposal sites; duty of owners, operators, and responsible parties to provide information and access; remedies.

This is an applicable action-specific requirement for the cleanup of CERCLA sites.