



State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor
William W. Cobey, Jr., Secretary

William L. Meyer
Director

August 19, 1992

Mr. P.A. Rakowski, P.E., Head
Environmental Programs Branch
Environmental Quality Division
Department of the Navy
Atlantic Division
Naval Engineering Command
Norfolk, Virginia 23511-6287

RE: MCB Camp Lejeune Addendum to Final RI/FS
Sites 6, 9, 48, and 69

Dear Mr. Rakowski:

We have reviewed your letter/fax of August 18, 1992 concerning the "Handling of Site Investigation Generated Hazardous Wastes", in the amended version of section 5.11 of the Final RI/FS. We previously responded to Laurie Boucher regarding a Draft of this same letter we received August 12, 1992.

North Carolina Superfund Section comments are as follows:

1. It is the policy of the NC DEHNR that drill cutting and sample material, not retained for analysis, will be properly containerized, labeled, and stored. The disposition of the containerized soil will be determined after a TCLP test is performed.

The use of a HnU for screening soils for the presence of contaminants will not be acceptable for the following reasons:

- a. The HnU will not detect inorganics.

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- b. Some contaminants that exceed applicable levels of the TCLP test may not be detected with the HnU.
 - c. Failure to properly screen soils could lead to a situation where contaminated surface soils could be discharged to the groundwater table or the capillary zone during backfilling.
2. Section 5.11.4, "Labeling", in regards to additional labeling for containerized soils determined to be hazardous, change "may be required" to "will be required."

If you have any questions please contact me at (919) 733-2801, extension 333.

Sincerely,



E. Peter Burger, P.E.
Environmental Engineer
Superfund Section

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