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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

APR 13 1993

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Byron Brant
Department of the Navy - Atlantic Division
Naval Facilities Engineering Command
Code 1822
Norfolk, Virginia 23511-6287

RE: Marine Corps Base Camp Lejeune NPL Site
Operable Unit 3, Site 48
Jacksonville, North Carolina

Dear Mr. Brant:

EPA has reviewed the document titled "Draft Proposed Remedial Action Plan for Operable Unit No. 3 (Site 48)" dated March 5, 1993. EPA comments on the draft document are enclosed.

If you have any questions or comments, please call me at (404) 347-3016.

Sincerely,

A handwritten signature in cursive script that reads "Michelle M. Glenn".

Michelle M. Glenn
Senior Project Manager

Enclosure

cc: Peter Burger, NCDEHNR
Neal Paul, MCB Camp Lejeune

COMMENTS
DRAFT PROPOSED REMEDIAL ACTION PLAN
Operable Unit Three
(Site 48)

COMMENTS

1. Page 1, 3rd paragraph - The last sentence should be rewritten for clarity. There won't be another PRAP on this site.
2. Page 5, 2nd paragraph - Please spell out "FFA".
3. Page 5, 5th paragraph - The sentence beginning "In general, the majority of the contaminants detected..." should be rewritten for clarity.
4. Page 5, last paragraph - Please insert "compounds" after "organics" in the second sentence.
5. Page 8, Table 1 - The "JB" qualifier should either be dropped or an explanation added somewhere as to its significance.
6. Page 11, 1st paragraph - The "Contract Required Detection Limits" will have little or no meaning to the average reader. (I'm not sure myself of what you are trying to say with the reference here.) Please clarify.

Perhaps a discussion of the relationship to MCLs would be appropriate.

7. Page 11, Scope and Role of Action - The discussion in this section addresses only the actions planned for Site 48. It does not explain the role, if any, of the OU3 in the site-wide remediation efforts. For example, has the mercury migrated from Site 48, such that you'll be looking for it on other parts of the site? Or does Site 48 have no relation to the remedial actions being conducted.

A short explanation of the scope and role of OU3 in relation to the remaining response actions at the site should be included. If OU3 will not impact remaining actions, then the anticipated future actions should be briefly described along with the statement that the action proposed for OU3 is not expected to impact those actions.

One way to do this is to indicate that this operable unit encompasses all of the media at Site 48 and that no other sites have been impacted.

8. Page 12, Summary of Site Risks - Spell out "RA". In the last sentence please correct the typo and replace "these two" with "Baseline".
9. Pages 12 and 13, Human Health Risk Assessment - This section justifies the decision not to take action at OU3. Accordingly, it must clearly document that the OU is currently protective of human health and the environment.

This section should be revised to include an express finding, based upon the Risk Assessment, that no current or future risk is posed by any contaminant through any of the pathways identified on page 12. The focus of this section should be on establishing the OU is PROTECTIVE, as opposed to merely comparing contaminant levels to established standards such as MCLs and AWQCs.

10. Page 13, 2nd paragraph - Doesn't this have to do with the Ecological assessment?
11. Page 13, "Ecological Risk Assessment" - Please include a statement in the second paragraph that current conditions are protective of human health and the environment.
12. Page 13, "Description of "No Action" Preferred Alternative" - The last sentence should be rewritten to read "No additional sampling or monitoring will be necessary since conditions at the site are protective of human health and the environment".
13. Page 14, Community Participation - Please remove "allow" and replace it with "solicit", then delete "to provide".

"Public Comment Period" - The paragraph announcing the public meeting should mention the proposed plan or remedy not the proposed "Record of Decision".
14. Page 16 - Is Byron Brant actually the "Commanding Officer" as stated here?

CERTIFIED

P 405 064 284

MAIL

**BYRON BRANT, P.E.
COMMANDER, ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING
COMMAND
CODE 1822
NORFOLK VA 23511-6287**