03.01-04/21/94-01096

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director

DEHNR

April 21, 1994

Commander, Atlantic Division
Naval Facilities Engineering Command
Code 1823-1
Attention: MCB Camp Lejeune, RPM
Ms. Linda Berry, P. E.
Norfolk, Virginia 23511-6287

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

RE: Draft Final Remedial Investigation Report for Operable Unit #5 (site 2)

Dear Ms. Berry:

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

Sincerely,

Patrick Watters

Patrick Watters
Environmental Engineer
Superfund Section

Attachment

cc: Gena Townsend, US EPA Region IV
Neal Paul, MCB Camp Lejeune
Bruce Reed, DEHNR - Wilmington Regional Office
Jack Butler, NC Superfund Section

North Carolina Superfund Comments
Camp Lejeune MCB Operable Unit 5
Draft Final Remedial Investigation Report

GENERAL

1. The North Carolina Groundwater Standard (Title 15, Subchapter 2L) for lead is 15 µg/L. There were several places where the incorrect value was cited. For example, Table 1-5 indicates 5.0 µg/L as the North Carolina lead standard, the table on page 4-19 used 50 µg/L, and Figure 4-10 does not indicate that the State groundwater standard for lead is exceeded for those sample results above 15 µg/L.

2. References are made in this and other reports to using base specific background values as a means to help determine the significance of contaminant concentrations identified on the various sites. Table 6-2 provides concentration ranges for various elements but there was no information provided on how this range was developed or of the source and/or quality of the data. If this data is to be used as points of comparison, it would be beneficial to provide information on how, where and when this data was obtained.

   As a suggestion, it may be worthwhile to compile this background data in a separate report that could be referenced as needed. This report could include information on where and when the samples were taken in addition to details on sample integrity and other QA/QC concerns. It is conceivable that such a report would be useful in addressing regulatory compliance issues as well as identifying potential contaminants of concern.

3. Page 2-16, Section 2.6
   The last sentence of this section states that none of the listed parameters (Vinyl Chloride, BTEX) were detected in any of the soil gas samples for Site 2. Tables 1 through 4 of Appendix E (Soil Gas Survey Report) show numerous gas sample analytical results above the indicated reporting limit. Please explain this apparent discrepancy.

4. Page 4-37, Section 4.3.4
   The first paragraph discussing the source of carbon disulfide contamination in the surface water at the Overs Creek Area is confusing. The first two sentences state the source is unknown and that there is no indication this is associated with activities at Site 2. The third sentence indicates that it was not detected in the railroad drainage ditches however the next sentence states that it may be attributable to this discharge.

5. Page 6-7, Section 6.2.1.1
The first paragraph on this page includes some discussion of toluene and xylene as naturally occurring compounds. If this claim is to be used it needs to be supported by appropriate background samples.

6. Page 6-32, Section 6.3.4.2
The conversion factor (CF) for the dermal contact CDI equation should be 1.0E-06 kg/mg instead of 10E-6 kg/mg.

7. Pages 6-51 through 6-58, Sections 6.5.1.and 6.6
These sections provide summaries of the quantitative results of the human health baseline risk assessment for Site 2. The terminology (i.e. above, below, within) used to describe the relationship of the calculated risk to the target risk range (1E-4 to 1E-6) is not always consistent. In one case, a risk of 7E-4 is indicated to be "below" the risk range. In another example, the same risk value of 7E-4 is said to be "above" the risk range. Likewise, a risk of 2E-3 is indicated as both above and below the target risk range for two different scenarios.