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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

May 20, 1994

Commander, Atlantic Division
Naval Facilities Engineering Command
Code 1823-2
Attention: MCB Camp Lejeune, RPM
Ms. Katherine Landman
Norfolk, Virginia 23511-6287

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

RE: Draft Interim RI/FS Report and Draft Interim Proposed Remedial Action Plan for Operable Unit 10 (Site 35), MCB Camp Lejeune.

Dear Ms. Landman:

The referenced documents have 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

North Carolina Superfund Comments
Draft Interim RI/FS Report and PRAP
Operable Unit 10 (Site 35) MCB Camp Lejeune

RI Report

1. General
These are several references (Page 4-9, Section 4.2; Page 5.2, Section 5.3; Page 5-4, Table 5-1) in the RI report that utilizes data presented in the Shacklette and Boerngen USGS Paper of 1984 as background concentrations. Using data that covers the entire eastern United States as a basis for background comparisons at Camp Lejeune is inappropriate. The data in the Shacklette and Boerngen report covers a very large geographical area and therefore would not be representative of the specific area around Camp Lejeune. This is evidenced by Table 5-1 in the RI Report which shows metals concentrations from the Shacklette and Boerngen report spanning as much as 3 orders of magnitude.

The use of "Base-Specific Background" values as noted in Table 5-1 should be supported with information on how, where, and when this data was obtained.

2. Page 2-3, Section 2.3
This section indicates that a geophysical anomaly had been identified in a previous study to the north of the former gasoline station. It is not clear from the RI/FS report if this anomaly has been fully investigated to determine conclusively whether or not this is a potential source of contamination.

3. Page 3-1, Section 3.1
The fourth sentence should state that soil borings SB-33 and SB-34 were drilled downgradient of the Fuel Farm.

4. Page 4-1, Section 4.1
The second paragraph under Section 4.1 states that 2-hexanone was found in soil sample SB3405 at 23,000 µg/kg. Table 4-1 (Page 4-2) shows a value of 12,000 µk/kg for SB3405.

5. Page 4-9, Section 4.2
This section indicates that some of the data shown in Table 4-2 has qualifiers to indicate if the data was rejected (R), biased high (H), or biased low (L). There is no information provided to explain why these data qualifiers are necessary.

6. Page 6-5, Section 6.2.1
The second paragraph on the page lists numerous metals and states that they were not considered as COPCs because the concentrations were well below their respective EPA Region III RBC value for residential soil. Table 6-1 on page 6-6 does not show RBC values for iron, lead, calcium, magnesium, potassium and sodium.

Feasibility Study

7. Page ES-7
The reference to the NC DEHNR guidelines (Groundwater Section Guidelines for the Remediation of Soils and Groundwater) as a chemical specific ARAR for the remediation goals is inconsistent with the NCP. This guidance should be viewed as under the "to be considered" category noted in Subpart E of the NCP and not an ARAR because they were not promulgated under NC State environmental statutes.

8. Page 1-5, Section 1.2.5.3
See the general comment regarding the use of regional background values noted for the RI Report.

9. Page 3-16, Section 3.3.5.2.1
Please explain the origin and use of the term "rotovation" and whether or not it has a more specialized meaning beyond mixing and agitating the soil.

10. Page 5-6, Table 5-1
The collection of 1 sample does not appear adequate to represent 100 CY of excavated soil. Please indicate the rationale for using this sampling scheme.

11. Page 5-11, Section 5.1.4.2
It is not clear how uncontrolled VOC emissions from the soil aeration alternative (RAA # 4) will result in "no" environmental impact.

12. Page 5-11, Section 5.1.4.2
The last sentence on this page needs to be revised for clarity.

13. Page 5-14, Section 5.1.5.2
Same comment as number 10 above regarding "no" environmental impact from uncontrolled VOC emissions.

14. Page 5-23, Section 5.2.7
The last sentence on this page should reference RAA # 4 instead of RAA # 2.

Draft Proposed Remedial Action Plan

15. General
With regard to the six proposed remedial action alternatives, the State concurs that RAAs 1, 2 and 4 are the least desirable based on the reasons cited in the PRAP. We should note that with regard to RAA No. 2, the State prefers on-site treatment to off-site disposal options as a matter of policy.

With regard to RAAs 3, 5 and 6, we prefer the on-site alternative (RAA 6) followed by RAAs 5 and 3 based mostly on the on-site treatment versus off-site disposal policy.