

04.01-06/23/94-01117

(804) 322-4793

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**JUN 23 1994**

CERTIFIED MAIL RETURN RECEIPT REQUESTED

United States Environmental Protection Agency,  
Region IV  
Waste Management Division  
Attn: Ms. Gena Townsend  
345 Courtland Street, N.E.  
Atlanta, Georgia 30365

Re: Draft Final Feasibility Study Report (FS), Proposed  
Remedial Action Plan (PRAP), and Record of Decision (ROD)  
Operable Unit No. 1 (Sites 21, 24, 78) MCB, Camp Lejeune,  
North Carolina

Dear Ms. Townsend:

Enclosed please find responses to USEPA comments received on  
the FS Report dated March 2 and 18, 1994, the PRAP dated  
March 17, 1994, and the ROD dated March 23, 1994. Any  
questions concerning these responses should be directed to  
Ms. Linda Berry who may be reached at (804) 322-4793.

Sincerely,

L. A. BOUCHER, P.E.  
Head  
Installation Restoration Section  
(South)  
Environmental Programs Branch  
Environmental Quality Division  
By direction of the Commander

Enclosure

Copy to: (w/encl)  
NC DEHNR (Mr. Patrick Watters)  
MCB Camp Lejeune (Mr. Neal Paul)  
Baker Environmental (Mr. Ray Wattras)  
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1823 (LGB) 2 copies w/encls)  
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**RESPONSE TO COMMENTS SUBMITTED BY USEPA REGION IV  
ON THE DRAFT FS REPORT FOR OPERABLE UNIT 5 (SITE 2)  
MARINE CORPS BASE, CAMP LEJEUNE**

**I. Comment Letter Dated January 24, 1994**

**General Comments**

1. Two additional shallow monitoring wells have been installed on site. The Navy Contractor discussed the well locations with Ms. Gena Townsend. A second round of groundwater samples was collected, inc. This second round of data has been incorporated into the RI Report.
2. The FS has been revised in response to this comment. Two times the average background concentrations will be utilized. The Navy, however, has reservations regarding this approach. This is due to the statistically insignificant number (six) of background samples available to calculate an average.

**Specific Comments**

1. A list of acronyms will be included after the Table of Contents.
2. The discrepancies between Tables ES-1 and 2-7 have been corrected.
3. The "J" qualifier description will be added to the footnotes of Tables ES-1 and 2-7. The inconsistencies between these two tables will be addressed.
4. Chromium was not retained as a COPC because it was detected only once at a concentration of 75 µg/L, which is greater than the North Carolina WQS of 50 µg/L, but less than the Federal MCL of 100 µg/L. Lead was not retained because it was detected (in 2GW01) at 15.5J µg/L, which is just above Federal MCL of 15 µg/L. Lead was also detected at a concentration of 27.2J µg/L in well 2 GW09. However, this well is considered a background well.

As noted in the response to General Comment No. 1, additional monitoring wells have been installed at the site.

5. The last paragraph of Section 1.0 (page 1-3) has been revised to indicate that confirmatory sampling must be performed to demonstrate that no human health or ecological risks remain after the TCRA. This requirement will also be incorporated into the Technical Specifications for the TCRA.
6. As noted in the response to General Comment No. 1, additional monitoring wells have been

installed at the site.

7. Monitoring wells 2GW7 and 2GW4 are located downgradient of monitoring well 2GW3.
8. A description of the reasoning used to determine the size of the areas to be included in the TCRA was presented in Section 1.3.2. This section has been revised based on the preliminary design work completed for the TCRA.
9. Tables 1-2 through 1-16 have been revised using twice the base specific average background concentrations. In addition, Tables 1-2 and 1-4 list inorganic contaminants detected in the Lawn and Mixing Pad Areas, which will be remediated through the TCRA. Therefore, these inorganic contaminants will be removed.
10. The BTEX reference on Table 1-7, page 1-21, will be revised to TEX, which agrees with the contaminants listed (i.e., toluene, ethylbenzene, xylene).
11. The units on Tables 1-16 and 1-17 will be corrected to milligrams per kilogram.
12. See response to General Comment No. 1.
13. The text has been revised in response to this comment. The text describes the impact of these activities on the cost estimate.
14. The text has been revised in response to this comment. The distinctions between SVE and air sparging are noted.

## **II. Comment letter dated February 8, 1994**

1. The text has been revised in response to this comment.
2. The table has been revised in response to this comment.
3. The tables have been revised in response to this comment. For groundwater, a PC of 1.0 is utilized in accounting for the amount absorbed via the dermal route of exposure.

