

06.01 - 08/18/94 - 01305

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

August 18, 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: Revised Draft Final Record of Decision for Operable  
Unit # 1 (sites 21, 24, and 78)

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, Superfund Section

North Carolina Superfund Comments  
Camp Lejeune MCB Operable Unit 1  
Revised Draft Final Record of Decision

1. General

The Superfund Section agrees with the selected remedy outlined in the ROD, however, a waiver from the NC groundwater regulations will be needed for those areas with VOC/SVOC and heptachlor epoxide contamination above the NC groundwater standards that are not being actively remediated. The need for this waiver is clear and can be found in the NC groundwater regulations [15A NCAC 2L.0106]. Obtaining this waiver will require submission of a Corrective Action Plan (CAP) addressing the specific points noted in Section .0106 of the groundwater regulations. Further guidance on waivers and the format of CAPs can be found at the back of the 2L regulations and in "Groundwater Section Guidelines for the Investigation and Remediation of Soils and Groundwater" published by the Groundwater Section of the North Carolina State Government.

2. Metals Contamination

The issue of metals contamination has been discussed at length for this and other operable units at Camp Lejeune. It was our understanding that further groundwater sampling for Total Dissolved Solids (TDS) and Total Suspended Solids (TSS) was to be performed as part of the selected remedy for both Operable Units 1 and 5 to determine if the metals contamination is real or simply a result of sampling limitations. The ROD for OU 1 does not include any provisions to obtain groundwater samples for TDS or TSS as is being done for OU 5.

If the metals contamination in the groundwater is not going to be investigated further and if active remediation is not going to be performed, then a waiver will be needed from the groundwater regulations as described in # 1 above. Also, if additional groundwater sampling is conducted and concludes that the metals contamination is above the 2L standards, then a waiver to the groundwater standards would be necessary if active remediation is not selected as the corrective action.

3. Issues noted in the Remedial Investigation Report.

Several comments were made on the RI Report which should be considered as part of the additional sampling with the remedy selected for OU 1. The major issues are as follows:

- Demonstrating with data that deep groundwater contamination has not migrated beyond the western border of OU 1 (near supply wells 601 and 602)
- Demonstrating with data that the deep groundwater at Site 24 has not been impacted by metals or pesticide contamination.
- Demonstrating with data that the soil at the "probable refuse" area on Site 21 is not contaminated with pesticides.