

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



June 8, 1995

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 Feasibility Study for Operable Unit 7 (Sites
1, 28, and 30), 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,

A handwritten signature in cursive script that reads "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 Feasibility Study
Operable Unit 7 (Sites 1, 28, and 30) MCB Camp Lejeune

1. Page ES-6, Site 28 Soil

This section indicates that the maximum PCB concentration was 140 J ug/Kg at location 28-GW07. The RI Report indicates that 1300 ug/Kg was found at location SB15.

2. Page 2-4, Section 2.4.4

This section states that the EPIC photographs did not indicate any evidence of past disposal activities. This seems to conflict with the RI Report (Section 2.3.4) which states that some of the EPIC photographs, "...indicate significant activity within suspected disposal areas or depict an alteration of surface conditions."

3. Page 5-1, Section 5.1.2

Groundwater RAA No. 2 includes a recommended "housekeeping" program for managing waste handling and disposal practices for Site 1. The State agrees with this recommendation but feels that if there are inadequate housekeeping measures with regard to waste handling and disposal anywhere on base, these should be promptly corrected regardless of what is decided through CERCLA.

4. Pages 6-3 through 6-12, Section 6.2

The discussion of the different Remedial Action Alternatives (RAAs) includes assumptions and conclusions about the contaminants at Site 1 that need some clarification.

- This section includes the comment that mercury will only meet the chemical specific Applicable or Relevant and Appropriate Requirements (ARARs) through natural attenuation. Please elaborate on the specific mechanisms by which the mercury will attenuate.
- The discussion of RAAs 1 and 2 indicates that (based in part on the Solute Plume 2D-H Model) leaving TCE untreated in the groundwater will be an effective way of dealing with the contaminants of concern. The discussion of the other RAAs indicates that active remediation would not be effective because on-going operations could introduce more TCE in the aquifer. Please clarify these contradictory conclusions.
- The sections on RAAs 1 and 2 indicates that over time natural attenuation may reduce TCE below the ARARs. The sections on RAAs 3 through 5 state that TCE may eventually increase to levels above the ARARs. Please resolve these contradictory conclusions.
- Appendix D indicates that the computer model assumed a "constant source" based on the highest TCE concentration. It is not clear if this "constant source" adequately

accounts for the later assumption that on-going operations could add more TCE in the aquifer.

- If existing operations could potentially act as a continuous groundwater contamination source, then this implies that the handling and disposal of wastes is inadequate and not in compliance with applicable regulations. As noted in comment number 2, if there are "housekeeping" problems then these should be corrected regardless of what is decided through CERCLA.
5. Page 6-13, Section 6.3.1
This section indicates that all 5 RAAs have the potential to meet the groundwater remedial action objectives. Based on the discussions of the RAAs, the comments provided in number 4 above and the final remediation levels given in Table 3-10, the State does not concur with this conclusion.
 6. Table 8-2
The Federal groundwater standard for lead should be 15 ug/L.