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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

February 16, 1996

Commander, Atlantic Division  
Naval Facilities Engineering Command  
Code 1823  
Attention: MCB Camp Lejeune, RPM  
Mr. Lance Laughmiller  
Norfolk, Virginia 23511-6287

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

RE: Draft Remedial Investigation Report for Operable  
Unit 9 (Site 65), MCB Camp Lejeune.

Dear Mr. Laughmiller:

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 Parris, DEHNR - Wilmington Regional Office  
Jack Butler, P.E., Chief, NC Superfund Section

North Carolina Superfund Comments  
Draft Remedial Investigation Report  
Operable Unit 9 (Site 65) MCB Camp Lejeune

1. Site Description

I cannot make a clear correlation between the site map given in the OU 9 RI/FS Work Plan (Figure 2-5) and the site map given in the OU 9 RI report (Figure 1-2). These maps look like two completely different areas therefore it is difficult to determine the location of the areas of concern and whether or not adequate sampling was performed. As an example, the northernmost "debris pile" in the Work Plan figure does not show up in the RI Report figure. The RI Report should address differences between the Work Plan and the RI Report such as this.

2. Sampling Scheme

I have the following concerns about the general sampling scheme used for Site 65.

- We only have 1 well and 1 test pit in one extreme end of the area noted as the "burn pit" (Figure 2-1). This area is drawn to be approximately 200 feet long therefore I do not think this provides enough data to adequately characterize this area of concern.

- The OU 9 Work Plan did not indicate that there were two ponds that were backfilled. Given that and the fact that there are two disposal areas that have not been found, I think there is reasonable suspicion to think that maybe the filled in ponds are the unaccounted for disposal areas. The filled in areas as shown on the photographs have not been sampled (with the exception of a few SI surface water and sediment samples) and all of the monitoring wells are upgradient of these locations. Unless there is other information to exclude these as areas of concern, I believe these areas need to be investigated before we formulate any final conclusions about Site 65.

3. Page 4-5, Section 4.2.2.3

This section describes upgradient samples that were taken for this RI. Since these samples were taken at other IR sites, a map should be included to show specifically where they were taken. I am especially concerned about the suitability of the Site 41 surface water and sediment samples as being "upgradient" since surface water was a key contamination issue at Site 41.

4. Page 4-13, Section 4.4.7

I would agree that methylene chloride and acetone are typical lab contaminants but I am concerned that the high levels seen in the fish samples are a result of improper procedures at the laboratory. There needs to be further explanation or some additional sampling performed before these results can be dismissed as lab contaminants.

5. Page 4-14, Section 4.6

The third paragraph discusses the contaminants seen in the various blank samples taken for this RI. The relationship of the acetone levels to inadequate drying time after decontamination has been used twice before to explain elevated levels of acetone. We responded that the decontamination procedures should be revised to preclude this from being a problem in the future. Since this is still a problem, I will reiterate that the procedures must be revised to allow adequate drying time. I want to see this procedural problem corrected so that this rationale is not used again in future RI reports to explain elevated acetone levels in samples.

I am also bothered by the claim that "cross-contamination" may be a cause for elevated lab contaminants. Claiming cross-contamination implies that the quality control of samples and/or analyses was inadequate. This raises questions about the overall integrity of the data used in this RI Report. It is essential that all cross-contamination problems be identified and corrected promptly.

6. Page 6-6, Section 6.2.1.7

Explain the basis for using two times the average site specific background as a cut-off for inorganics considered to be essential nutrients. This seems inconsistent when used in conjunction with the RAGS (Section 5.9.4) based criteria of "...slightly above naturally occurring levels".