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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

March 5, 1996

Commander, Atlantic Division  
Naval Facilities Engineering Command  
Code 1823  
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 Remedial Investigation Report for Operable  
Unit 12 (Site 3), MCB Camp Lejeune.

Dear Ms. Landman:

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,

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 Parris, DEHNR - Wilmington Regional Office  
Grover Nicholson, NC Superfund Section

North Carolina Superfund Comments  
Draft Remedial Investigation Report  
Operable Unit 12 (Site 3) MCB Camp Lejeune

1. Table 1-2  
The North Carolina Groundwater Standards for the following contaminants were not included in this table. I realize these compounds were not in the 2L regulations at the time of the 1991 site inspection; however the table should reflect the current standards.
  - Fluorene 280 ug/L
  - Naphthalene 21 ug/L
  - Phenanthrene 210 ug/L
  
2. Page 2-6, Section 2.2.3  
The next to last paragraph on this page indicates that only 26 out of the 34 subsurface samples taken during the Phase II soil investigation were analyzed for TCL semivolatiles. It is not clear from Table 2-1 which 8 samples this refers to therefore please indicate which 8 samples were not analyzed for TCL semivolatiles. Since the nature of the contaminants at this site are TCL semivolatiles, clarify why these analyses were not done.
  
3. Page 4-8 through 4-12, Section 4.4.2  
The area of greatest groundwater concern at Site 3 is probably the former Treatment Area. Even though there are several wells at the site and three rounds of sampling data, there is only 1 shallow, 1 intermediate and 1 deep well (the MW02 cluster) in the Treatment Area. The closest downgradient shallow wells are ~200 feet away from MW02. The closest intermediate well is ~300 feet downgradient from MW02. Because PAH's are generally not very mobile, the State is concerned that the well spacing goes way beyond the extent of the contamination which may not give a clear indication of how far these PAH's have migrated from the Treatment Area.