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From: Commander, Atlantic Division, Naval Facilities Engineering Command
To: Commanding General, Marine Corps Base, Camp Lejeune (Mr. Brian Marshburn, EMD/IRD)

Subj: COMMENTS ON THE DRAFT BASIS OF DESIGN FOR PCB SOIL REMOVAL AT OU6, SITE 36, CAMP GEIGER DUMP, MARINE CORPS BASE, CAMP LEJEUNE

Encl: (1) Response to Comments Concerning the Draft Basis of Design for PCB Soil Removal at OU6, Site 36, Camp Geiger Dump, Marine Corps Base, Camp Lejeune

1. Responses to your comments on the above referenced document are included as Enclosure (1), with the Final Basis of Design modified to reflecting these comments.

2. Please direct any questions or comments to Mr. Bob Schirmer, P.E. at (757) 322-4751.

L. G. SAKSVIG
By direction

Blind copy to:
Activity Admin Record File
18236
18S
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Response to Comments Submitted by US Marine Corps,
Camp Lejeune Environmental Management Division on
the Draft Basis of Design for PCB Soil Removal at OU6, Site 36,
Camp Geiger Dump, Marine Corps Base, Camp Lejeune,
Dated May 6, 1997

General Comments

1. The maximum PCB concentration detected in the soil at Site 36 during the RI (Aroclor 1248 - 24 mg/kg) was lower than the maximum concentration detected in the soil during the post-RI sampling completed in November 1996 (Aroclor 1248 - 74 mg/kg). The referenced RI human health and ecological risk assessment conclusions noted within the Basis of Design relates to the maximum concentration detected during the RI and was based on site-wide distribution. Although the human health risk assessment was not re-computed following the elevated PCB detections in November and December of 1996, the related maximum concentration would most likely generate unacceptable human health risks. In addition, the maximum concentration detected in the soil at Site 36 is above acceptable levels identified in the USEPA document entitled Guidance on Remedial Actions for Superfund Sites with PCB Contamination for both future residential or industrial use.

Specific Comments

2. The text under the first bullet on page 2-3 of the Basis of Design, Section 2.2.4 has been expanded to clarify the occurrence of the copper, lead, and zinc concentrations; the natural occurrence of iron in the vicinity of MCB, Camp Lejeune; and the unlikely mobility of lead.

3. The text in the second paragraph of the Basis of Design, Section 2.3.1 has been revised to eliminate confusion related to the carcinogenic risks that were evaluated within the RI.

4. Where appropriate, the term areas has been modified to volume within the Basis of Design, Section 2.4. The soil volumes to be excavated have been reported in cubic yards.