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NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT

February 4, 1998

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: Comments on the Draft Pre-Remedial Investigation
Screen Study Sites 12, 68, 75, 76, 84, 85 and 87
Marine Corps Base, Camp Lejeune, North Carolina

Dear Ms. Landman:

The referenced document has been reviewed. We concur with the recommendations for sites 84 and 85, specifically as follows:

- Site 84: Immediate removal of PCB-contaminated sediments in the lagoon followed by a supplemental investigation of soil contamination. The soil contamination investigation should include full-scan analysis.
- Site 85: Immediate removal of the waste battery piles and contaminated soils followed by a second phase of sampling that includes full-scan analysis.

Attached are the comments of David Lilley on the Risk assessment. Our responses to the other recommendations will follow your reply to Mr. Lilley's comments.

Please call me at (919) 733-2801, extension 278 if you have any questions.

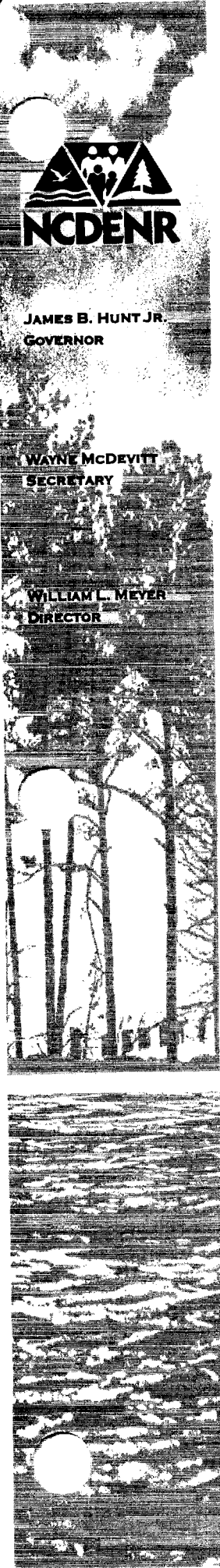
Sincerely,

David J. Lown, LG, PE
Geological Engineer
Superfund Section

Attachment

cc: Gena Townsend, US EPA Region IV
Neal Paul, MCB Camp Lejeune
Diane Rossi, DEHNR - Wilmington Regional Office

401 OBERLIN ROAD, SUITE 150, RALEIGH, NC 27605
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NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT



February 2, 1998

JAMES B. HUNT JR.
GOVERNOR

TO: David Lown

FROM: David Lilley

DBL

RE: Comments prepared on the Draft Pre-Remedial Investigation
Screening Study for Sites 12, 68, 75, 76, 84, 85, and 87, Marine
Corps Base, Camp Lejeune, NC
July, 1996

WAYNE McDEVITT
SECRETARY

WILLIAM L. MEYER
DIRECTOR

After reviewing the above mentioned document, I offer the following
comments:

1. Page 5-7: It is unclear to the reader why soil samples were analyzed only for BTEX at Site 12. Why was a metals analysis not conducted for groundwater at Site 12? Please explain.
2. Page 5-9, second paragraph: According to Table 5-7, potassium and selenium were both retained as COPCs. They should be added to this paragraph.
3. Page 5-9, fourth paragraph: The last line should read: "Therefore, these SVOCs were retained as *sediment* COPCs", not surface water COPCs.
4. Page 5-12: It is unclear to the reader why the sampled media was analyzed for only PCBs at site 84. Why was subsurface soil not sampled? Please explain.
5. Page 5-12, last paragraph: It is claimed 10 samples were analyzed for PCBs. Table 5-20 says seven samples were analyzed for PCBs. Please explain this contradiction.
6. Page 5-13, Site 85: It is unclear to the reader why the sampled media was analyzed for inorganics only. Please explain.
7. Page 5-13, last paragraph: According to the USEPA Region 4 Supplemental Guidance to RAGS, Human Health Risk Assessment Bulletin No. 1, page 1-4, 1995, "Any member of a chemical class that has other members

selected as COPCs should be retained (e.g., detected carcinogenic polynuclear aromatic hydrocarbons)". All the carcinogenic PAHs detected in the Site 87 surface soil should be retained as COPCs.

8. Table 5-38: It is unclear to the reader why a residential exposure scenario was not conducted for site 84. Please explain.
9. Table 5-36: The ingestion rate for a child should be 200 mg/day, not 100 mg/day.
10. Table 5-39: The RfD for bis(2-ethylhexyl)phthalate is 2.0E-02, not 2.0E-03 as claimed.
11. Table 5-39: The RfD for gamma-chlordane is 3E-04, not 6.0E-05 as claimed.
12. Table 5-39: The note for chromium (4) should be (5).
13. Table 5-39: The RfD for manganese is 1.4E-01, not 2.3E-02 as claimed.
14. Table 5-39: The CSFI for alpha and gamma-chlordane should be 6.3, not 1.29.
15. Table 5-39: The CSF for alpha and gamma-chlordane should be 6.3, not 1.3 as claimed.
16. Table 5-39: The acronym "NCEA" is left undefined.
17. Table 5-39: The RfD for 4-methylphenol is not in IRIS as claimed.
18. Table 5-39: The RfD for naphthalene is not in IRIS as claimed.