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NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES

DIVISION OF WASTE MANAGEMENT

March 10, 2000

Commander, Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street (Building N-26)
Norfolk, Virginia 23511-2699

Attention: Ms. Katherine Landman, PE
Navy Technical Representative
Code 18232

Commanding General
Marine Corps Base
PSC Box 20004
Camp Lejeune, NC 28542-0004

Attention: AC/S, EMD/IRD

RE: NC Superfund Comments
Draft Action Memorandum
OU16, Site 89
MCB Camp Lejeune

Dear Ms. Landman:

The Superfund Section received and reviewed this document and has the following comments:

1. Page 10, first paragraph, last 3 sentences. The North Carolina Water Quality Standard for 1,1,2,2-PCA is an interim standard set at 0.17 ug/l. Interim standards are set by the Groundwater Section as specified by NCAC 2L and are considered ARARs. The interim standards can be found at the Groundwater Section web site (<http://gw.ehnr.state.nc.us/index.htm>).
2. Page 17, next to the last paragraph. Treating the soils to levels below health-based or groundwater-protection levels so that they can returned to the site would be preferable; however, if the treated soils are going to a Subtitle D landfill, then they must past the TCLP test. This is in addition to meeting the LDRs. For contaminants not found on the TCLP list, the leachate should contain no more than 100 times the 2L standard. In the case of 1,1,2,2-PCA, this is 17 ug/l.
3. Page 17, last paragraph. The asphalt cap should contain an impermeable membrane to stop infiltration of rainwater.



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4. Page 18, second paragraph. Permits are not required. However, the substantive requirements of discharge permits must be determined and met.
5. Pages 22 & 23. ARARs.

Additional chemical-specific ARARs include:

North Carolina Groundwater Standards	15A NCAC 2L
North Carolina Water Quality Standards	15 A NCAC 2B.0100 & .0200
North Carolina Surface Water Effluent Limitations	15A NCAC 2B.0400
North Carolina Hazardous Waste Rules	15A NCAC 13A

Additional location-specific ARARS can be found in the following regulations:

North Carolina Hazardous Waste Management Rules	15A NCAC 13A
North Carolina Solid Waste Management Rules	15A NCAC 13B

Other action-specific ARARs include the following:

NC Groundwater Corrective Action	15A NCAC 2L.0106
NC Well Construction Standards	15A NCAC 2C.0100
NC Injection Well Construction Standards	15A NCAC 2C.0200
NC Water Quality Discharge Requirements	15A NCAC 2H.0100&.0200
NC Sediment Control Rules	15A NCAC 2H.1000

We appreciate the opportunity to review this document. If you have any questions or comments, please contact me.

Sincerely,



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

cc: Neal Paul, MCB Camp Lejeune
Gena Townsend, USEPA