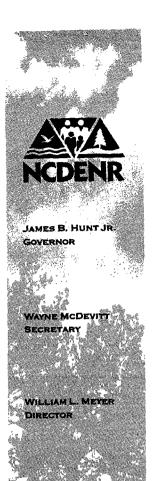


NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES

DIVISION OF WASTE MANAGEMENT

January 6, 1999



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

Attention:

Ms. Maritza Montegross

Navy Technical Representative

Code 18233

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

Attention:

AC/S, EMD/IRD

RE:

NC Superfund Section Comments

Draft No Further Response Action Plan

Site 76

Marine Corps Base, Camp Lejeune

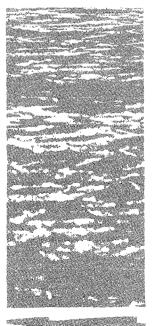
Dear Ms. Montegross:

We have reviewed this document and have the following general comments.

Several of the G3:S1 screening values in Table 1-1 are incorrect or missing. The soil-to-groundwater pathway screening levels contained in Table 1, attached, were calculated using the equation in the USEPA Soil Screening Levels Guidance document and input data applicable to North Carolina. None of these corrections change the no-further-response-action determination for the site.

There are exceedences of the NC 2L standard, MCL, or the Region III screening level in groundwater for iron, aluminum, thallium, arsenic, and vanadium. Iron is the only potential contaminant detected in soil above the soil screening level for the soil-to-groundwater pathway. The mostly likely explanation for the iron, as well as the other metals, is a high natural background in the surficial aquifer.

In addition to the iron mentioned above, nickel, selenium, 4,4'-DDE and 4,4'-DDD were detected in the soil above the soil-to-groundwater-pathway screening levels, however these were not detected in the groundwater above any of the standards or screening levels. In view of the age and history of the site, these contaminants are not likely sources of groundwater contamination.



Ms. Montegross 1-6-99 Page 2

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

Attachment NC Superfund Section Comments Draft No Further Response Action Plan Site 76 Marine Corps Base, Camp Lejeune

Table 1. Soil Screening Levels
Soil-to-Groundwater Pathway

Parameter	Soil Screening Level µg/kg
Semivolatiles	
Bis(2-Ethylhexyl)phthalate	6,670
Benzo(b)fluoranthene	1,160
Benzo(a)pyrene	91.1
Pesticide/PCBs	
Heptachlor	2.40
Heptachlor epoxide	6.67
Dieldrin	1.13
4,4'-DDE	346
4,4'-DDD	129
4,4'-DDT	136
Alpha-Chlordane ¹	27.7
Gamma-Chlordane ¹	27.7
¹ Chlordane used as a surrogate	