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State of North Carolina Department of Environment, Health, and Natural Resources Division of Solid Waste Management P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor William W. Cobey, Jr., Secretary William L. Meyer Director

20 May 1992

Commander, Atlantic Division Naval Facilities Engineering Command Code 1822 Attention: MCB Camp Lejeune, RPM Mr. Bryon Brant

Norfolk, Virginia 23511-6287

Commanding General

Attention: AC/S, Environmental Management Building 1, Marine Corps Base Camp Lejeune, North Carolina 28542-5001

Subject: Baseline Risk Assessment for HPIA Shallow Soils and Castle Hayne Aquifer USMC Camp Lejeune Military Reservation NC6 170 022 580 Jacksonville, Onslow County, North Carolina

Dear Sir and Madam:

The North Carolina Superfund Section has received and reviewed the Baseline Risk Assessment for Hadnot Point Industrial Area (HPIA) Shallow Soils and Castle Hayne Aquifer. The following comments are offered on this document:

- 1. Page 2-27: PCBs are not pesticides.
- 2. Page 3-21: It is unclear to the reader why the footnote "+ Includes adult and child exposure." is included in this table.
- 3. Page 4-2, second sentence: The less than sign should be changed to a greater than sign.

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- 4. Page 4-2: The units for the CSF are $(mg/kg/day)^{-1}$.
- 5. Page 5-3: It is unclear to the reader what standard is being referenced where 40 CFR 300.430:62 is mentioned, do you mean 40 CFR 300.430 (e)(2)?
- 6. Appendix B, Item 3.13: It is stated that for conservativeness it is assumed that base personnel wear a long-sleeved shirt and long pants while working. Actually, it would be more conservative to assume they wear short sleeved shirts and short pants, which would increase the surface area available for contact.

If you have any questions please contact me at (919) 733-2801.

Sincerely,

lach Datter.

Jack Butler, Environmental Engineer Superfund Section

JB/dk/45

cc: Michelle M. Glenn, EPA Region IV