

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary



November 1, 1993

Commander, Atlantic Division
Naval Facilities Command
Code 1823-1

Attention: MCB Camp Lejeune, RPM
Ms. Linda Berry, P. E.
Norfolk, Virginia 23511-6287

Commanding General

Attention: AC/S, Environmental Management
Building 67, Marine Corps Base
Camp Lejeune, North Carolina 28542-5001

RE: Draft Remedial Investigation (RI), Draft Ecological
Site Assessment (ESA), and Draft Feasibility Study
(FS) for Operable Unit 2, Sites 6, 9, and 82, MCB
Camp Lejeune, Jacksonville, NC

Attached please find comments provided to the NC Superfund Section
by our sister agencies for the above referenced documents.

Although the comment periods are over for the subject documents, we
are forwarding these comments for your consideration. Regarding
the need for an Air Quality permit, NC Superfund acknowledges that
such permits are not required for NPL sites however, the
substantive requirements of the North Carolina Air Quality
regulations must be met. Please call me if you have any questions
about this.

Sincerely,

Patrick Watters
Environmental Engineer
NC Superfund Section

cc: Preston Howard, DEHNR
Neal Paul, MCB Camp Lejeune
Gina Townsend, US EPA Region IV
Bruce Reed, DEHNR Wilmington Regional Office

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Environmental Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
A. Preston Howard, Jr., P.E., Director



September 20, 1993

MEMORANDUM

RECEIVED
OCT 07 1993

SUPERFUND SECTION

TO: Patrick Waters
Environmental Engineer/Super Fund Section

FROM: Preston Howard *PKH*

RE: *PKH* Draft Remedial Investigation (RI), Draft Ecological Site
Assessment (ESA), and Draft Feasibility Study (FS)
Report Review
Operable Unit No. 2
Marine Corp Base
Camp Lejeune, Onslow County
Proj. #93-32

As requested the Division of Environmental Management has reviewed the subject document. The comments from our Water Quality, Air Quality, and Groundwater Sections are provided below.

Water Quality Section Comments:

The reports indicated that North Carolina Water Quality Standards have been exceeded. The Responsible Party (RP) should consult with the Division of Marine Fisheries if any large volume of fresh water, resulting from the possible treatment of groundwater, is disposed of into Wallace or Bear Head Creeks.

Air Quality Section Comments:

In review of the proposed remedial actions presented, any remedial action scenario chosen that includes an air pollution control device, will require an air permit.

Ground Water Section Comments:

Comments on the Remedial Investigation (RI): We have no major problem with the recommendations found on page ES-33 as they relate

Memorandum
Preston Howard
Page Two

to groundwater. However, the RP should keep in mind that 15A NCAC 2L requires that the entire vertical and horizontal extent of groundwater contaminant plumes must be defined. More information about the clay layer found at 230 feet at Site 82 is needed, as well as better definition of the VOC plume in the horizontal and vertical directions. Also, we do not concur that the remedial action technologies be based only upon results of "Human Health Risk Assessments", but rather to state guidelines, rules, and regulations.

Comment on the Feasibility Study (FS): We recommend that groundwater Remedial Action Alternative No. 6 (Source Removal, Complete Groundwater Treatment) be implemented; and that Soil Remedial Action Alternative No. 3 (On-Site Treatment) or No. 5 (Off-Site Treatment) be implemented. These alternatives will best restore the areas affected by the incidents.

We have no comments to offer on the Ecological Site Assessment (ESA). This document has been given to the Division of Marine Fisheries so that they may be aware of the problems of the impacted creeks.

Thank you for the opportunity to review the subject document. Should you have any comments or wish additional discussion on this matter please contact Rick Shiver at (919) 395-3900.

NT/nt/RCRA/RL

cc: Arthur Mouberry
Steve Tedder
Sammy Amerson
Rick Shiver
Nargis Toma