Admin Rec.

06.01-08/09/95-01462

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 William L. Meyer, Director



August 9, 1995

Commander, Atlantic Division Naval Facilities Engineering Command Code 1823-2 Attention: MCB Camp Lejeune, RPM Ms. Katherine Landman Norfolk, Virginia 23511-6287

Commanding General AC/S, EMD/IRD Attention: Marine Corps Base **PSC Box 20004** Camp Lejeune, NC 28542-0004

RE:

Draft PRAP, and ROD for Operable Unit 4.

Dear Ms. Landman:

Attached please find comments provided to the Superfund Section by our sister agencies for the above referenced documents. Note that a preliminary copy of these comments was sent to you via fax in mid Please let me know if you have any questions about this. June.

Sincerely,

(Patrich Wallers

Patrick Watters Environmental Engineer NC Superfund Section

Attachments

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

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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



July 31, 1995

MEMORANDUM

FROM:

TO: Jack Butler, Head Remediation Branch/,

Preston Howard

SUPERFUND SECTION

AUG 07 1995

RECEIVED

SUBJECT: Camp Lejeune Draft ROD and Remedial Action Plan Onslow County

Project No. 95-14

The Division of Environmental Management has completed the review of the subject document and offers the following comments and recommendations.

Air Quality Section

AUG - 4

No comments at this time.

Water Quality Section

The lead levels associated with the sites within Operable Unit No. 4 are a major concern as they appear to be or are likely to impact surface waters. Unless adequate treatment and/or control measures are provided, this Office will increase monitoring of the surface waters for any impact of the metals on surface water quality.

Groundwater Section Comments

We understand that the Navy/Camp Lejeune does not Site 41: want to "cap" the site with an impermeable material because of the risk associated with the unexploded ordnance and CWM. Therefore, we suggest they apply for a variance to the 2L rules that require control of primary and secondary sources of contamination. The Groundwater Section suggests that alternative 41GW-3, "Seep Collection and Institutional Controls and Treatment and Monitoring", be implemented if the variance can be obtained for the contamination sources. If the alternative obtained, then variance is not

P.O. Box 29535, Raleigh, North Carolina 27626-0535 Telephone 919-733-7015 FAX 919-715-0588 An Equal Opportunity Affirmative Action Employer 50% recycled/ 10% post-consumer paper 41GW-4, "Groundwater Extraction and Treatment with Institutional Controls and Monitoring", should be implemented.

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Site 74: Pesticides were found above background levels across the site in the soil, but most were found at the former pest control area at concentrations up to 3,800 ug/kg. Heptachlor was detected in groundwater at 0.01 ug/l. Other pesticides have been found in shallow groundwater at this site, but reportedly have been below state standards. The selected remedies for this site are for "Institutional Controls" the soil, and "Institutional Controls and Monitoring" for the groundwater. The WiRO Groundwater Section is prepared to accept these remedies, if the Division Waste Management concurs with of Solid the Navy's/Camp Lejeune's decision of not removing the pesticide contaminated soils.

If there are any questions, please advise.

APHjr/sbp/SWM2.

cc: Alan Klimek Steve Tedder Wilmington Regional Office Central Files Groundwater Section Files