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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

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Director

18 March 1991

Mr. Julian I. Wooten, Assistant Chief of Staff  
Environmental Management  
US Marine Corps  
Marine Corps Base Camp Lejeune, NC 28542-5001

Subject: Draft Work Plan  
Draft Health and Safety Plan  
Draft Field Sampling Plan and Quality Assurance Project Plan  
Draft Laboratory QA/QC Plan  
USMC Camp Lejeune Military Reservation, NC6170022580  
Jacksonville, Onslow County, North Carolina

Dear Mr. Wooten:

The North Carolina Superfund Section has received and reviewed the subject documents for the USMC Camp Lejeune Military Reservation site and offer the following comments:

1. The phone number for the Duke University Poison Information Center presented on page 12-3 of the Draft Health and Safety Plan is incorrect. It is recommended that all phone numbers in the Draft Health and Safety Plan be double checked for accuracy.
2. In Section 5.3 of the Draft Health and Safety Plan (page 12-3) it is stated that full-face air purifying respirators, equipped with organic vapor/acid gas cartridges with HEPA filters, will be used anytime positive HNU readings are observed in the breathing zone. Conditions requiring upgrading of personnel protection to level B and level A should also be specified in this document.
3. In Section 7.3 of the Draft Work Plan for Site Inspection (page 7-1) it is stated that the field investigation at Site 80, Paradise Point Golf Course, will

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be limited to sampling of soils, sediments, and surface water due to low mobility of the contaminants presumed to be present. If significant contamination is found in soil, sediment, or surface water at this site, groundwater monitoring should also be conducted.

4. In Section 8.3.1 of the Draft Work Plan for Site Inspections (page 8-1) it is stated that no monitoring wells are proposed at Site 3, Old Creosote Plant. It is recommended that groundwater monitoring be conducted at this site. Despite the low solubility and high organic carbon partition coefficient of polynuclear aromatic hydrocarbons and chlorinated phenols associated with creosote facilities, these contaminants have been found in groundwater at a number of wood treating facilities in North Carolina including two National Priority List sites.
5. In Section 13.3.5 of the Draft Field Sampling Plan (page 13-13), it is stated that monitoring well development water will be discharged onto the ground. All cuttings from wells, well development water, and purge water should be containerized on site until laboratory analysis has shown this material to be uncontaminated.

The North Carolina Superfund Section appreciates the opportunity to offer these comments and we look forward to participating in the Technical Review Committee meeting on 21 March 1991. If you have any questions or would like to discuss the subject site, please contact me at (919) 733-2801.

Sincerely,



Jack Butler  
Environmental Engineer  
Superfund Section

JB/ds/7

cc: Carl Froede