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CTO-314/ARF

**NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES**

**DIVISION OF WASTE MANAGEMENT**



January 6, 1999



**JAMES B. HUNT JR.**  
GOVERNOR

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SECRETARY

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DIRECTOR

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,

A handwritten signature in black ink, appearing to read "David J. Lown". The signature is fluid and cursive, with the first name "David" and last name "Lown" clearly distinguishable.

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

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

<sup>1</sup>Chlordane used as a surrogate