



CTU-314/ARF

NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES

DIVISION OF WASTE MANAGEMENT

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March 17, 1999



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GOVERNOR

WAYNE McDEVITT  
SECRETARY

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TO: David Lown

FROM: David Lilley *DBL*

RE: Comments prepared on the Baseline Risk Assessment Contained within the Pre-Remedial Investigation Screening Study, Sites 12, 68, 75, 76, 84, 85, and 87, MCB Camp Lejeune, NC. November, 1998

**NOTE:** The only portion of this document reviewed was the Site 85 BRA.

After reviewing the above mentioned document, I offer the following comments:

1. Page 5-4, second paragraph, last line: The most recent update of the Region III RBCs was October of 1998.
2. General Comment: The text should be corrected to refer the reader to the correct tables.
3. Page 5-19, subsurface soil: It is claimed five subsurface soil samples were analyzed, but Table 5-23 shows 10 samples were analyzed. Please correct this inconsistency.
4. Tables 5-22 through 5-24: The screening levels contained within the NC Risk Analysis Framework (RAF) document are **DRAFT** numbers and **NOT** to be used or cited in Baseline Risk Assessments. The use of the **METHODOLOGIES** contained within the RAF is acceptable.
5. Page 5-20, Site 85 groundwater: According to this page, beryllium was selected as a COPC, but according to Table 5-24, it was not. Please correct this inconsistency.

6. Appendix L, Site 85: The exposure concentration (not "concentration carcinogen" as written) for manganese in surface soil should be 19,700 mg/kg, not 197,000 mg/kg.
7. Table 5-47: The military personnel surface soil HI should be shaded.