

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



January 6, 1994

Commander, Atlantic Division
 Naval Facilities Engineering Command
 Code 1823-1

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

Commanding General

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

RE: Final Remedial Investigation Feasibility Study Work
 Plan, Sampling and Analysis Plan, and Health and
 Safety Plan for Operable Unit #4 (sites 41, 69, and
 74)

Dear Ms Berry:

The referenced documents have been received and reviewed by the North Carolina Superfund Section. Based on our review there are still a few areas that may require some minor clarification. These areas are noted in the attachment to this letter. Please call me at (919) 733-2801 if you have any questions about this.

Sincerely,

Patrick Watters

Patrick Watters
 Environmental Engineer
 Superfund Section

Attachment

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

North Carolina Superfund Comments
Camp Lejeune MCB Operable Unit 4
Final Work Plan
Final Sampling and Analysis Plan
Final Health and Safety Plan

General

Some of the descriptions of the migration/transport and exposure pathways found in the Work Plan are slightly different from those in the Sampling and Analysis Plan. The impact of these differences to the overall site study and analysis may be minimal, however, we felt it was appropriate to bring these to your attention.

1. The second RI objective given in the Work Plan (Page 4-5, Section 4.2) for Site 74 is to "Evaluate groundwater quality around the disposal areas". The second RI objective for Site 69 is to "Evaluate on-site and off-site groundwater quality (shallow and deep)". It is still unclear why these apparently similar objectives are worded differently or whether or not these objectives will be handled differently. This comment was noted from the review of the draft final version of the Work Plan.
2. The Work Plan and the Sampling & Analysis Plan include an exposure pathway for ingestion of contaminated wildlife for sites 74 and 41 but not for site 69. It is not clear why this pathway is excluded from site 69.
3. Section 3.2.2 of the Work Plan includes a dermal contact soil exposure pathway for site 74. Section 1.3.2 of the Sampling and Analysis Plan which should be the same list, does not include the dermal contact portion of the pathway.
4. Section 1.3.2 of the Sampling and Analysis Plan lists various exposure pathways for site 74. The 6th bullet on page 1-25 is "Future potential human exposure (residential)." It is not clear how this pathway is different from the other human exposure pathways (bullets 2, 3, 4, 5, and 7) on the same page. Also, this pathway is not included for site 74 in the Work Plan (Section 3.2.2, Page 3-12).
5. Both the Work Plan and Sampling and Analysis Plan appear to make a clear distinction between the exposure pathways for "human exposure" versus "human exposure by military personnel". Site 69 includes both terms whereas sites 41 and 74 use only the term "human exposure".
6. Page 5-1 of the Health and Safety Plan make reference to "simulants" which is not defined in the text.