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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

February 2, 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: Draft Record of Decision for Operable Unit #5 (site
2)

Dear Ms. Berry:

The referenced document has been received and reviewed by the North Carolina Superfund Section. Our comments are attached. 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: Gena 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 5
Draft Record of Decision

1. Page vii
The second paragraph on the page indicates that one of the primary goals of the selected remedy is to "prevent migration of the contamination plume." It seems inappropriate to make this claim when the preferred remedy (RAA No. 2) had been established in the Proposed Remedial Action Plan as a remedy that would still permit migration of contamination.

2. Page vii
As noted in the comments on the Feasibility Study and the PRAP, the types of wells (i.e. potable wells, all wells, etc.) to be restricted if RAA No. 2 is implemented is not completely clear.

3. Page 5, Section 2.0
The fourth paragraph states that the July 1992 geophysical investigation did not identify any anomalies that could serve as sources of groundwater contamination. Appendix A of the Remedial Investigation Report indicates the geophysical survey was conducted on August 29, 1992. Appendix A also noted that radar records from the geophysical survey near well 2GW3 did indicate the presence of a "large buried object". The data was, however, not conclusive enough to determine if the object was a tank, utility line or other buried structure.

A variance from the groundwater rules will be necessary to use the selected remedy (RAA No.2). Source identification and removal could be an issue with regard to this variance, therefore, it may be appropriate to conduct conclusive investigations of the geophysical anomaly near well 2GW3.

4. Page 8, Section 4.0
This section states that sediment will not be addressed under this remedial section for various reasons. The Feasibility Study and the Proposed Remedial Action Plan indicate that both contaminated soils and sediment will be addressed via the Time Critical Removal Action. Also, the last bullet on page 9 acknowledges that there is contaminated sediment along the railroad drainage ditch.