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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 22, 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 Project Plans, Contaminated Soil and  
Groundwater Remedial Design for Operable Unit 2  
(sites 6, 9, and 82)

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 2  
Draft Remedial Design Project Plans

Work Plan Comments

1. General  
There is very little discussion of any predesign studies intended for soil Area of Concern (AOC) 2 other than a site survey and possible unexploded ordnance (UXO) clearance. The work plan should indicate why AOC 2 is not included in the soil sampling activities being conducted for the other soil AOCs.
2. Page 3-1, Section 3.2  
This section indicates that four soil areas of concern (AOC) were identified that require excavation of contaminated soils. Figure 4-1 shows 5 soil AOCs (2 through 6) that require excavation.
3. Page 4-2, Section 4.1.1  
This section discusses the planned soil removal actions for OU No. 2 but does not include AOC 6. AOC 6 is indicated in Figure 4-1 as requiring soil removal action.
4. Page 4-7, Section 4.6  
The acronym HTRW is not defined in the text.
5. Page 8-2, Figure 8-1  
The schedule allows only 14 days for the agency review of the 90% Design / Draft Final Design Report. This is not enough time to properly review this document. A minimum of 30 days should be allotted for agency reviews. Also, future review times for RD Work Plans should be increased to a minimum of 30 days.

Sampling and Analysis Plan Comments

6. Page 3-9, Section 3.2.4.3  
This section indicates a pesticide cleanup action level of 60,000  $\mu\text{g}/\text{kg}$  which corresponds to a risk level of 1E-04. The pesticide cleanup level for OU-5 was based on a 1E-06 risk level (page 1-12 of the Draft Feasibility Study for OU-5).
7. Page 3-13, Section 3.9  
The reference to the QA/QC sample requirements table does not include a table number.