

06.01-03/23/94-01086



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

March 23, 1994

4WD-FFB

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ms. Linda Berry  
Department of the Navy - Atlantic Division  
Naval Facilities Engineering Command  
Code 1823  
Norfolk, Virginia 23511-6287

SUBJ: Marine Corps Base Camp Lejeune NPL Site  
Draft Record of Decision  
Operable Unit No. 1 - Sites 21, 24, & 78  
Jacksonville, North Carolina

Dear Ms. Berry:

EPA has reviewed of the Draft Record of Decision for Operable Unit #1, Sites 21, 24, & 78 dated January 31, 1994. Enclosed are comments on the subject document. If you have any questions or comments, please call me at (404) 347-3016.

Sincerely,

A handwritten signature in cursive script that reads "Gena D. Townsend".

Gena D. Townsend  
Senior Project Manager

Enclosure

cc: Patrick Waters, NCDEHNR  
Neal Paul, MCB Camp Lejeune

## Comments

**1. Page 12 - 1st paragraph**

Include the location of the IRA documents for public review. "Documents on the Interim Remedial Action are located ...".

**2. Second paragraph - 2nd dot**

The fact that wide spread pesticide spraying is the cause of contamination in Codgels Creek and not site related is not an acceptable reason for non-treatment. The decision for non-treatment must be based on risk levels and/or corrective action is included within another operable unit.

**3. Page 19**

The text on this entire page may need correcting based on EPA's comments on the RI/FS.

**4. Page 48 - 4th paragraph**

Contaminated soils are being sent off-site for disposal in a non-hazardous waste landfill. How can this occur if the soils are contaminated with PCBs and pesticides? Explain the rationale for this action.

**5. Page 54 - ARARs**

The ARAR section needs to be expanded. See comments and examples provided with the comments on the OU5 ROD, letter dated February 3, 1994.

**6. Page 54 - ARAR Waivers**

The reasoning for the waivers are not acceptable. The statement that the resulting contamination is not site related does not preclude it from remediation.