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(804) 322-4793

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MAY 12 1994

CERTIFIED MAIL RETURN RECEIPT REQUESTED

United States Environmental Protection Agency,
Region IV
Waste Management Division
Attn: Ms. Gena Townsend
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Re: Draft Final Feasibility Study Report (FS), Proposed
Remedial Action Plan (PRAP), and Record of Decision (ROD)
Operable Unit No. 1 (Sites 21, 24, 78) MCB Camp Lejeune,
North Carolina

Dear Ms. Townsend:

Attached please find responses to USEPA comments received on
the FS Report dated March 2 and 18, 1994, the PRAP dated
March 17, 1994, and the ROD dated March 23, 1994. Any
questions concerning these responses should be directed to
Ms. Linda Berry who may be reached at (804) 322-4793.

Sincerely,

L. A. BOUCHER, P.E.
Head
Installation Restoration Section
(South)
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

Attachments

Copy to: (w/encls)
NC DEHNR (Mr. Patrick Watters)
MCB Camp Lejeune (Mr. Neal Paul) (w/o encls)
Baker Environmental (Mr. Ray Wattras, Mr. Rich Bonelli)

Blind copy to:
1823 (LGB) 2 copies w/encls)
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**Response to Comments Submitted by USEPA Region IV
on the Draft Feasibility Study Report for
Sites 21, 24, and 78 (Operable Unit No. 1),
MCB, Camp Lejeune, North Carolina**

Comment Letter by Ms. Gena D. Townsend dated March 2, 1994

1.0 RESPONSE TO GENERAL COMMENTS 1 THROUGH 5 -

1. The FS will be corrected to indicate that HP-601 is an inactive well and HP-603 is an active well.

Further evaluation of the historical analytical data from the supply wells will be conducted and incorporated into the design phase of OU No. 1.

2. Supply well HP-603 is an active well. The influence of the capture zone will be evaluated during the design phase of OU No. 1 since it may affect the groundwater extraction system proposed in the FS.
3. Solidification/stabilization was reconsidered as a potential technology/process option. No changes were made in the FS (i.e., the technology was retained during the preliminary screening, but was not retained following the process option evaluation). The reasons the technology was eliminated from further evaluation were: 1) limited amount of soil to be treated; and 2) site-specific land use constraints for disposal (utilities, roads, railroad, etc.) of treated material.
4. Agree with comment. No change to the report is necessary.
5. The typographical error on page 5-27 will be corrected.

**Response to Comments Submitted by USEPA Region IV
on the Draft Feasibility Study Report for
Sites 21, 24, and 78 (Operable Unit No. 1),
MCB, Camp Lejeune, North Carolina**

Comment Letter by Ms. Gena D. Townsend dated March 18, 1994

Comment is noted that a detailed review with respect to the human health evaluation will not be performed until the Draft RI is revised based on USEPA's comments and the appropriate changes are incorporated into the FS.

**Response to Comments Submitted by USEPA Region IV
on the Draft Record of Decision for
Sites 21, 24, and 78 (Operable Unit No. 1),
MCB, Camp Lejeune, North Carolina**

Comment Letter by Ms. Gena Townsend dated March 23, 1994

1. Page 12 - First Paragraph

The location of the IRA documents for public review has been added to the text.

2. Page 12 - Second Paragraph - Second Bullet

The remediation of Cogdels Creek would be impractical. Cogdels Creek receives storm water runoff from the HPIA. This runoff will continue to impact sediment quality after remediation is completed.

3. Page 19

Text has been revised based on the RI/FS comments.

4. Page 48 - Fourth Paragraph

The PCB levels detected in the soil were low enough that the soil would not have to be regulated under TSCA. The soil would be disposed in a landfill permitted to accept low levels (less than 50 ppm of PCBs). The pesticide-contaminated soil is not characteristically hazardous, nor is the soil a listed hazardous waste.

5. Page 54 - ARARs

The ARARs discussion was expanded as per the comment.

6. Page 54 - ARAR Waivers

The reasoning for waivers was revised to indicate the reason for the waivers were based on engineering practicability.

**Response to Comments Submitted by MCB Camp Lejeune
on the Draft Record of Decision for
Sites 21, 24, and 78 (Operable Unit No. 1),
MCB, Camp Lejeune, North Carolina**

Comment Letter by Mr. Walt Haven dated February 24, 1994

1. Page viii

Last two sentences will be revised as per the marked comment; the sentences will be removed and replaced with "5 year review will be necessary for this remedial action to ensure complete groundwater remediation."