

03.01-06/20/94-01202



DEPARTMENT OF THE NAVY  
ATLANTIC DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
1510 GILBERT ST  
NORFOLK VA 23511-2699

TELEPHONE NO:  
(804) 322-4818  
IN REPLY REFER TO:  
5090  
18232:KLH:cag

JUN 20 1994

CERTIFIED MAIL RETURN RECEIPT REQUESTED

North Carolina Department of Environment,  
Health, and Natural Resources  
Attn: Mr. Patrick Watters  
P.O. Box 27687  
401 Oberlin Road  
Raleigh, NC 27611

Re: MCB Camp Lejeune; Response to NC DEHNR Comments on the  
Draft Interim RI/FS and PRAP for Operable Unit No. 10  
(Site 35)

Dear Mr. Watters:

This letter addresses your comments on the above referenced  
project. Navy/Marine Corps responses are attached. These  
comments have been incorporated in the Draft Final version of the  
documents (issued by Baker on June 14, 1994) which you should  
have already received under separate cover.

Any questions concerning these responses should be directed to  
Ms. Katherine Landman at (804) 322-4818.

Sincerely,

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

Attachment

Copy to:  
EPA Region IV (Ms. Gena Townsend)  
MCB Camp Lejeune (Mr. Neal Paul)  
Baker Environmental, Inc. (Mr. Ray Wattras, Mr. Dan Bonk)  
Activity Admin Record File

RESPONSE TO COMMENTS SUBMITTED BY  
PATRICK WATTERS, NC DEHNR  
DRAFT INTERIM REMEDIAL ACTION RI/FS AND PRAP  
LETTER DATED MAY 20, 1994

**RI REPORT**

1. General

Agreed. Text has been modified to discuss site and base specific background. A site-specific background sample was obtained from boring location SB-29 and base-specific background was obtained from a database which is continually expanding with ongoing Camp Lejeune investigations. Shacklette and Boerngen data are still presented to provide a regional benchmark for potential inorganic soil concentrations, but more emphasis is given to site-specific and base-specific background soil analytical results.

2. Page 2-3, Section 2.3

The area of the geophysical anomaly identified by NUS is being subjected to additional investigation under the comprehensive site-wide RI/FS being conducted concurrent to the Interim Remedial Action RI/FS.

3. Page 3-1, Section 3.1

Text modified as per comment.

4. Page 4-1, Section 4.1

Text has been amended to show 2-hexanone for soil sample SB3405 at 12,000 µg/kg, not 23,000 µg/kg.

5. Page 4-9, Section 4.2

Copies of the validation reports will be added to the report as Appendix F, this should clarify issues pertaining to the use of qualifiers.

6. Page 6-5, Section 6.2.1

Text has been amended to further define the criteria by which COPCs were not retained for metals.

**FEASIBILITY STUDY**

7. Page ES-7

Text modified as per comment.

8. Page 1-5, Section 1.2.5.3

See response to Comment 1.

9. Page 3-16, Section 3.3.5.2.1

The term "rotovation" has been removed from the text and replaced with "tilling and mixing."

10. Page 5-6, Table 5-1

The rationale for collecting one sample per 100 cubic yards is based on Baker's professional judgement. Although not noted in Table 5-1, it is

anticipated that the one sample will be a composite sample obtained at several locations throughout the 100 cubic yard pile. Additional field screening may also be employed to ensure the representativeness of sampling. The sampling criteria will be addressed in detail in the Remedial Design Work Plan.

**DRAFT PRAP**

11. Page 5-11, Section 5.1.4.2

Text modified as per comment.

12. Page 5-11, Section 5.1.4.2

Text modified as per comment.

13. Page 5-11, Section 5.1.5.2

Text modified as per comment.

14. Page 5-23, Section 5.2.7

Text modified as per comment.

**DRAFT PROPOSED RAP**

15. General

Table 1 has been modified to indicate the state's preference of on-site treatment options.

P 212 4 539

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