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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

August 18, 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: Revised Draft Final 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
Jack Butler, Superfund Section

North Carolina Superfund Comments
Camp Lejeune MCB Operable Unit 5
Revised Draft Final Record of Decision

1. General

The Superfund Section agrees with the selected remedy outlined in the ROD, however, a waiver from the NC groundwater regulations will be needed for the ethylbenzene and xylene contamination identified near well 2GW3. This waiver is required because the selected remedy (Institutional Controls/Long-Term Groundwater Monitoring - RAA No. 2) will not actively remediate the ethylbenzene and xylene contamination. The need for this waiver is clear and can be found in the NC groundwater regulations [15A NCAC 2L.0106]. Obtaining this waiver will require submission of a Corrective Action Plan (CAP) addressing the specific points noted in Section .0106 of the groundwater regulations. Further guidance on waivers and the format of CAPs can be found at the back of the 2L regulations and in "Groundwater Section Guidelines for the Investigation and Remediation of Soils and Groundwater" published by the Groundwater Section of the North Carolina State Government.

Note that a waiver is not needed at this time for the inorganics concern because it is still being investigated. If the additional investigation shows that the metals contamination is above the 2L standards, then a waiver to the groundwater standards would be necessary if active remediation is not selected as the corrective action remedy.