

06.01 - 08/03/94 - 01318



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:

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AUG 03 1994

CERTIFIED MAIL RETURN RECEIPT REQUESTED

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

Re: MCB Camp Lejeune
Response to EPA Region IV Comments
Draft Interim Record of Decision
Operable Unit No. 10 (Site 35)

Dear Ms. Townsend:

Attached are Navy/Marine Corps responses to EPA Region IV comments on the above-referenced document. The Draft Final version of the document (issued 7/20/94) incorporates these comments.

Please direct any questions to Ms. Katherine Landman at (804) 322-4818.

Sincerely,

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

Attachment

Copy to:
NC DEHNR (Mr. Patrick Watters)
MCB Camp Lejeune (Mr. Neal Paul)
Baker Environmental, Inc. (Mr. Ray Wattras, Mr. Dan Bonk)
Activity Admin Record File

**RESPONSE TO COMMENTS SUBMITTED BY USEPA, REGION IV
DRAFT INTERIM RECORD OF DECISION
OPERABLE UNIT #10 (SITE 35)
MCB CAMP LEJEUNE, NORTH CAROLINA**

Comment letter by Ms. Gena Townsend dated June 30, 1994.

1. Cover

The title of this document has been revised to read "Interim Record of Decision, Contaminated Soil, Operable Unit No. 10"

2. Page iv Statutory Determinations

This section has been retitled "Declaration" and the context changed as per Exhibit 9-8 from OSWER Directive 9355.3-02.

3. The first paragraph of Section 6.0 (Summary of Site Risks) has been revised to include an identification of the Contaminants of Potential Concern (COPCs) and their detected concentrations. The COPCs for this Interim Action included benzene and arsenic.

4. A table has been added to the "Compliance With ARARs" subsection of Section 8.0 (Summary of Comparative Analysis of Alternatives) to address this comment.

5. The Draft ROD has been modified as per the comment. RAA 5 (Source Removal and Off-Site Soil Recycling) was selected as the final remedy for the subject site. It was chosen over RAA 6 (Source Removal and On-Site Low Temperature Thermal Desorption) because it is anticipated it will be more cost effective. Although RAA 3 (Source Removal and Off-Site Biotreatment) is estimated to be roughly equal to RAA 5 in cost, RAA 3 was not selected as the preferred alternative because there are more available off-site commercial soil recycling facilities (RAA 5) than biotreatment facilities (RAA 3). Consequently, RAA 5 should be easier to implement. However, if a suitable soil recycling facility is not available at the time of remediation, a biotreatment facility may be substituted as an alternative, subject to the approval of a modification to the Interim ROD.

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