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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

June 30, 1994

Commander, Atlantic Division
Naval Facilities Engineering Command
Code 1823-2

Attention: MCB Camp Lejeune, RPM
Ms. Katherine Landman
Norfolk, Virginia 23511-6287

Commanding General

Attention: AC/S, EMD/IRD
Marine Corps Base
PSC Box 20004
Camp Lejeune, NC 28542-0004

RE: Draft Interim Remedial Action Record of Decision
for Operable Unit 10 (Site 35), MCB Camp Lejeune.

Dear Ms. Landman:

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

North Carolina Superfund Comments
Draft Interim Remedial Action Record of Decision

General

The Record of Decision (ROD) indicates that either Remedial Action Alternative (RAA) 3, 5, or 6 be the selected remedy based on the lowest available price as can be documented by the Remedial Action Contractor (RAC). The Superfund Section concurs that RAAs 3, 5, and 6 are the better alternatives however, the purpose of the ROD as defined in the National Contingency Plan (NCP) is to document the final remedy selected by the lead agency. This ROD does not meet the intent of the NCP because three different alternatives were selected instead of only one. This ROD could possibly be structured with contingency clauses to allow the use of an alternate remedy if the selected method proves to be inappropriate.

Since cost is apparently the deciding factor and part of the NCP evaluation criteria, this should be more definitively addressed in the ROD and not by the RAC. Also, it may be appropriate to revisit the other decision criteria to determine the best remediation alternative.