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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

December 7, 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: Final Basis of Design, Soil Remediation at Operable
Unit 10, Site 35

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
Camp Lejeune MCB Operable Unit 10
Final Basis of Design for Soils Remediation

1. Page 3 and Drawing C-1

The top of the page indicates that the highway through Site 35 will be four lane. It was noted by NC-DOT during the 9/29/94 design meeting that the highway design was changed from four to six lanes. The change from 4 to 6 lanes should also be indicated on Drawing C-1

2. Page 5, Soil Sampling

The soil sampling frequency noted in Item 1 on Page 5 is not consistent with Section 9.4 of the Groundwater Section Guidelines for the Investigation and Remediation of Soils and Groundwater. These guidelines state that a composite sample should be taken and analyzed for every 200 cubic yards of stockpiled soil. Each composite sample should be obtained from a mixture of six randomly chosen primary samples of approximately equal size. Since this guidance document is being used to establish site cleanup levels (i.e. the Site Sensitivity Evaluation) it is appropriate to use this sampling methodology. Consult Section 9.4 of the guidance document for a complete description of the soil sampling requirements.

3. Building G-480 UST

One of the contaminated soils areas designated in the OU 10 Interim Record of Decision is a former UST location near building G-480. This location is not included in the Basis of Design. It is our understanding that the contaminated soil at this location was removed as part of a UST action and the area was subsequently paved over. As a result, it may not be necessary to conduct further soils removals at this area.

The documentation associated with the original soils removal at G-480 is said to be inconclusive, therefore, additional data is needed to determine what, if any remedial actions are needed. It is acceptable to the State to postpone remediation plans for this small area until confirmatory samples necessary to establish the status of the G-480 UST area soils have been obtained and analyzed. A Final ROD still needs to be developed for OU 10 and this area can be a part of that decision if necessary.

It is important in the interim to clearly indicate the status of the G-480 UST area and the actions to be taken in this Basis of Design document.

(804) 322-4793

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18231:LGB:cag
DEC 12 1994

From: Commander, Atlantic Division, Naval Facilities
Engineering Command
To: Commanding General, Marine Corps Base,
Camp Lejeune (Attn: Mr. Neal Paul)
Subj: TANK CLOSURES AT MIDWAY PARK, LOT 803 HOLCOMB
BOULEVARD, TANKS 61-66 AT TARAWA TERRACE,
MCAS TANK SITES 419, 420, AND 421

1. This letter serves as an update on the status of the subject sites that has occurred over the course of the last few months.

- Midway Park: MCB CLJ submitted the closure plan to NCDEHNR. Awaiting approval for an "administrative closure".
- Lot 803 Holcomb Boulevard: CB CLJ's contractor, Mr. Dewberry Davis has certified the site as a "clean closure" in accordance with closure plan. Awaiting NCDEHNR concurrence.
- Tanks 61-66 at Terrawa Terrace: MCB CLJ is awaiting NCDEHNR approval of the sampling plan. Once received, MCB CLJ will task Dewberry Davis to complete sampling plan.
- Tanks 419, 420, 421 at MCAS New River: MCB CLJ submitted a closure plan to NCDEHNR. Awaiting approval for an "administrative closure".

2. If the facts stated above are not in accordance with your understanding, please contact the LANTDIV point of contact on this matter, Ms. Linda Saksvig at (804) 322-4793.

L. A. BOUCHER
By direction

Copy to:
MCB Camp Lejeune (Mr. Brynn Ashton, Mr. Brent Rowse)

Blind copy to: 18231 (LGB), 18S, rcra.lgb