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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

February 22, 1995

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 Feasibility Study and Draft Interim
Proposed Remedial Action Plan 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 Feasibility Study and
Draft Interim Proposed Remedial Action Plan
Operable Unit 10 (Site 35) MCB Camp Lejeune

General

1. Site Descriptions

It would be helpful to add diagrams or maps in the FS and PRAP to show the contamination plumes that are to be remediated by this Interim FS and those that are subject to further study. Figure 2 in the PRAP outlines the limits of the study area but does not clarify which plumes are to be remediated.

Also, the descriptions of the area to be remediated under this Interim RA are worded differently between the RI Report, the FS and the PRAP which creates some confusion about the specific location of the affected areas and the contaminants and media to be addressed. Examples of this are:

Page ES-1 and Page 1-1 of the FS states that the Interim FS applies to "...contaminated groundwater in the vicinity of the Fuel Farm at Site 35."

Page 2-1 of the FS states that the focus of the Interim FS is the "...surficial groundwater in the vicinity of the Fuel Farm extending downgradient to Brinson Creek."

Page 8-3 of the RI Report states that an Interim RA FS will be prepared "...focusing on the groundwater in the vicinity of the Fuel Farm and north of Fourth Street. The purpose of this Interim FS will be to address groundwater contamination in this area which may be a continuing source of contamination to Brinson Creek." (NOTE: See also comment # 5 from the comments [dated 1/27/95] submitted on the Draft RI Report)

Page ES-4 of the FS indicates that the fuel-related contamination of the groundwater is adequately defined and "...is limited to the area north of Fourth Street in the vicinity of obvious suspected sources such as the Fuel Farm and nearby former UST sites."

Page 11 of the PRAP states that the interim remedial action "...focuses on contaminated groundwater in the portion of the surficial aquifer that is located between the proposed highway and Brinson Creek."

Also, it would be helpful to expand the discussions (including site maps) in the FS and PRAP to provide a clearer overall picture of how the two Interim Remedial Actions and the Comprehensive Remedial Action will address contamination concerns at Site 35. This is important for those readers that are not on the Lejeune team and therefore may not be as deeply involved in the process.