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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 29, 1995

Commander, Atlantic Division  
Naval Facilities Engineering Command  
Code 1823

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 Proposed Remedial Action Plans and Records of  
Decision for Operable Unit 7 (Sites 1, 28 and 30),  
MCB Camp Lejeune.

Dear Ms. Landman:

The referenced documents have 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,

A handwritten signature in cursive script that reads "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 PRAP and Draft ROD  
Operable Unit 7 (Sites 1, 28 and 30) - MCB Camp Lejeune

Proposed Remedial Action Plan - Site 1

1. Summary of Alternatives Section

This section references the "general housekeeping" recommendation as being part of the alternatives considered for this site. As noted in the comments to the FS, if there are housekeeping concerns associated with the management of chemical wastes, these need to be promptly addressed regardless of what is decided through CERCLA.

Proposed Remedial Action Plan - Site 28

2. Summary of Alternatives Section

Deed restrictions are proposed for Soil Remedial Action Alternatives (RAA) 2 and 3 only. RAAs 4 and 5 should probably include the same deed restrictions as RAAs 2 and 3 because only the surface soils are being addressed at this former landfill site.

3. Pages 9 and 10, RAA 4 and RAA 5

Note that any exhumed debris other than contaminated soil must be handled and disposed of in accordance with North Carolina Solid Waste Regulations (15A NCAC 13B).

4. Page 11, Surface Soil Section

Excavation and Off-Site Disposal is RAA 5 not RAA 3. Also, as a matter of policy the State preference is to consider on-site remediation methods first followed by off-site alternatives.

Record of Decision - Site 1

5. Page 7, Section 6.0 - Soils

What is the basis for using the one order of magnitude above base-specific background level as the threshold of significance.

6. Page 6 and 7, Section 6.0

The first paragraph under "Soils" on page 6 indicates that the northern disposal area exhibited levels of VOCs in the groundwater that "...may be related to previous and/or ongoing maintenance activities, rather than previous disposal activities." The second paragraph under "Groundwater" on page 7 states that the TCE and 1,2 dichloroethene contamination "...may be related to off-site sources of contamination observed in this area, and not related to previous or ongoing activities at Site 1." Please clarify.