

06.01 - 06/20/95 - 01402

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 20, 1995

Commander, Atlantic Division
Naval Facilities Engineering Command
Code 1823-1

Attention: MCB Camp Lejeune, RPM
Ms. Linda Saksvig, P. E.
Norfolk, Virginia 23511-6287

Commanding General

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

RE: Draft PRAP and ROD for Operable Unit 4.

Dear Ms. Saksvig:

Attached please find the comments provided to the Superfund Section by the Division of Environmental Management - Wilmington Regional Office on the above referenced documents. Please let me know if you have any questions about this.

Sincerely,

Patrick Watters

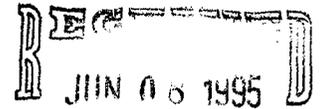
Patrick Watters
Environmental Engineer
NC Superfund Section

Attachment

cc: Gena Townsend, US EPA Region IV
Neal Paul, MCB Camp Lejeune
Bruce Reed, DEHNR - Wilmington Regional Office

RECEIVED

JUN 14 1995



SUPERFUND SECTION

DIVISION OF ENVIRONMENTAL MANAGEMENT

May 26, 1995

MEMORANDUM

TO: Arthur Mouberry

THROUGH: Rick Shiver

RSS

FROM: Charles Stehman

CS

SUBJECT: Review of Draft Proposed Remedial Action Plan & Draft Record of Decision Reports
Operable Unit No. 4
Marine Corp Base-Camp Lejeune
Project No. 95-14
Onslow County

Bruce Reed with the Groundwater Section of the Wilmington Regional Office provided the comments that are offered below for your consideration. The review involves a draft document relating to the investigation of Sites 69, 74, and 41 at Camp Lejeune. These comments include those from the Air Quality Section, the Water Quality Section, and the Groundwater Section.

Site Summaries

Site 74, the Mess Hall Grease Pit, is thought to have contained a former grease pit disposal area, and a former pest control area. The site is located in a flat area, near Henderson Pond. An operational water supply well proximal to the site is reportedly not contaminated. The site was used for disposal from the early 1950's until 1960. Grease was disposed of in trenches and periodically ignited with a volatile substance. Pesticide soaked bags were also reportedly disposed of in these trenches. CWM may be present because of a report of drum disposal at the site. It is rumored that the trenches may have been flushed-out by a historical hurricane. Supply well no. HP-654 is located nearby, but sampling has reportedly never revealed the presence of any contaminants.

Site 41, the Camp Geiger Dump at the Former Trailer Park, is situated on a topographically high area. Drainage is poor, with most of the drainage received by Tank Creek to the south and a unnamed tributary to the north. Construction debris and a few rusty drums were found on land surface. One of the drums was marked "dry cleaning solvent." Two seeps were noted discharging into an unnamed tributary. The site operated as an open burn dump from 1946 to 1970. The dump reportedly received construction debris, petroleum oil and lubricant (POL) wastes, mirex (a pesticide), solvents, batteries, CWM, and ordnance. Low levels of organic contaminants historically have been found in water samples collected from monitoring wells. Surface water samples have shown low levels of the pesticides aldrin and BHC. Sediment samples revealed low levels of chromium, lead, and 2,4,6-TNT.

The intrusive investigation at these sites was limited due to the reported CWM. Unexploded ordnance may be present at site 41.

Air Quality Section Comments

The selected remedies do not include any material that requires review by the Air Quality Section, therefore, we have no comments on these documents.

Water Quality Section Comments

The Water Quality Section comments that the lead levels associated with the sites within Operable Unit No. 4 are a major concern as they appear to be or are likely to impact surface waters. Unless adequate treatment and/or control measures is provided, this Office will increase monitoring of the surface waters for any potential impact of the metals on surface water quality.

Groundwater Section Comments

Site 41: Lead, iron, and manganese were detected above 2L standards in one monitoring well from a low-flow sampling technique. VOC's and metals have been previously detected in other monitoring wells. Shallow groundwater is discharging from the former disposal area via two seeps. Surface water samples collected from these seeps have exhibited elevated levels of iron, lead, and manganese. The report states that the unnamed tributary and Tank Creek do not appear to be significantly impacted by the site or the seeps. Downstream samples exhibited slightly higher iron and lead levels than those of upstream samples.

We realize this is a difficult situation for Camp Lejeune as unexploded ordnance and CHW may exist at this site. The selected remedy for Site 41 soil contamination is Institutional Controls (41SO-2). These controls will limit access via designation as a restricted area and control of future site use via designation in the Base Master Plan prohibiting invasive construction risks, and provide a long-term solution for restricted site use. The selected remedy for groundwater and seeps is the implementation of institutional controls and monitoring (41GW-2).

We understand that the Navy-Camp Lejeune does not want to "cap" the site with an impermeable material because of the risk associated with the unexploded ordnance and CWM. Therefore, we suggest they apply for a variance to the 2L rules that require control of primary and secondary sources of contamination. The Groundwater Section suggests that alternative 41GW-3, "Seep Collection and Treatment with Institutional Controls and Monitoring", be implemented if the variance can be obtained for the contamination sources. If the variance is not obtained, then alternative 41GW-4, "Groundwater Extraction and Treatment with Institutional Controls and Monitoring", shall be implemented.

Site 74: Pesticides were found above background levels across the site in the soil, but most were found at the former pest control area at concentrations up to 3,800 ug/kg. Heptachlor was detected in groundwater at 0.01J ug/l, and the 2L standard is 0.008 ug/l. Other pesticides have been found in shallow groundwater at the site, but reportedly have been below state and federal standards. The selected remedies for this site are "Institutional Controls" for the soil, and "Institutional Controls and Monitoring" for the groundwater. The WiRO Groundwater Section is prepared to accept these remedies, if the Division of Solid Waste Management concurs with the Navy's-Camp Lejeune's decision of not removing the pesticide contaminated soils.

If you have any questions, please do not hesitate to contact Charles Stehman or myself at (910) 395-3900.

Attachment

RSS/CFS/BAR

cc: Patrick Watters
WiRO-AQS
WiRO-WQS
WiRO-GWS

s:\gws\bruce\op#4.may

RECEIVED

JUN 05 1995

POLLUTION CONTROL BRANCH