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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

May 16, 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 Final Interim Feasibility Study, Draft Final
Interim Proposed Remedial Action Plan and Draft
Interim Record of Decision for Operable Unit 10
(Site 35), 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,

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

1. Soil and Sediment Sampling

The response to our comments on the Draft Remedial Investigation Report indicated that the soil and sediment data gaps would be filled in during the additional characterization work planned for Site 35. The recommendations listed on Page 1-26 of the Draft Final Interim FS which include additional sampling needs do not include provisions for additional soil and sediment sampling for metals.

2. Table 1 of the PRAP

The net present worth (30 years) noted in this table for RAA-2 is \$2,999,800. Page 13 of the PRAP indicates that the cost for RAA # 2 is \$299,800.

3. Selected Remedy (RAA-5)

The State considers the selected remedy (RAA-5 In-Well Aeration) as an unproven technology therefore it is appropriate to conduct testing under suitably controlled conditions to demonstrate its effectiveness before it is applied to Site 35. As we have discussed, the Interim ROD for this Site will be written to include suitable pilot/treatability studies as well as a contingency should these studies show that the selected method (RAA-5) is not appropriate. These pilot/treatability studies are to be based in part on those to be conducted for Operable Unit 14 (site 69).