

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

November 28, 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: 60 % Basis of Design Documents for the Remediation
 of Pesticide Contaminated Soil at Operable Unit 11
 (Site 80), 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 Parris, DEHNR - Wilmington Regional Office

60 % Basis of Design for Remediation of
Pesticide Contaminated Soil
Operable Unit 11, Site 80
MCB Camp Lejeune
Jacksonville, NC

1. General

The scheduled completion date for review of this Time Critical Removal Action (TCRA) design document was before the due date for the RI Report. As a result, I did not have time to become familiar with the results of the Remedial Investigation for Site 80, therefore I could not provide an in depth review of this design document. This sort of skewed document review schedule should be avoided in the future.

It is not clear if the southerly extent of the DDD and DDT contamination has been fully characterized. The highest level of DDD and DDT contamination was at location 80-DPA-SB03 which is in the last row of sampling points shown on Figure 7. Adequate confirmation samples need to be taken in this area after the TCRA to clearly show that cleanup levels have been met. Also, it was not clear if any samples had been taken to determine if the contamination extended across "Machine Shop Road" or "Golf Course Road".

The executive summary of the RI report indicates that arsenic is the secondary contributor to the soil risk values. The highest arsenic values seen in the surface soils are around the wash down area yet this area is not included as part of the TCRA. Please explain why the arsenic contaminated soils are not part of this TCRA.