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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 28, 1996

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 Record of  
Decision for Operable Unit 12 (Site 3), 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 x-282 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  
Diane Rossi, DEHNR - Wilmington Regional Office

Draft Proposed Remedial Action Plan  
Draft Record of Decision  
Operable Unit 12, Site 3  
MCB Camp Lejeune  
Jacksonville, NC

1. General

As noted in our comments on the Feasibility Study for Site 3, the State feels that there are areas of concern with the groundwater contamination at Site 3 based on the existing data. Our comments on the Feasibility Study also indicated that if a "No Action" remedy was selected for the groundwater that several quarterly rounds of "clean" samples would be necessary to conclusively demonstrate that there are no contamination concerns with the groundwater.

The State has the following comments regarding the selected remediation methods for the soils (Soils RAA # 5: source removal and composting) and groundwater (Groundwater RAA # 2: institutional controls and monitoring).

- Page 11 states that soil contaminants above the Region III screening levels will be removed from the subsurface. It is assumed that the Region III soil screening levels developed for transfers from soil to groundwater will be the values that will be used.

- The PRAP/ROD states that ALL of the subsurface source will be removed. The PRAP/ROD also states that the subsurface soils will be removed only to a depth of 9 feet which is approximately the top of the water table. The data from the SI and the RI well boring logs clearly show that soil contamination is below 12 feet. Based on this, it appears that the subsurface soil source will not be completely removed which is contrary to what is stated in the PRAP and ROD. If it is impractical to remove ALL of the soil source as in this case due to the water table depth, then the PRAP/ROD should clearly state this.