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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 Command
Code 1823

Attention: MCB Camp Lejeune, RPM
Ms. Katherine Landman
Norfolk, Virginia 23511-6287

Commanding General

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

RE: Draft Remedial Investigation Report for Operable Unit 13,
Site 63, MCB Camp Lejeune, Jacksonville, NC

Dear Ms. Landman:

The NC Superfund Section has completed its review of the above referenced document. Our comments are attached. Comments on the Risk Assessment are attached as a memo from Mr. David Lilley, our Industrial Hygienist to myself. Please call me at (919) 733-2801 x282 if you have any questions about this.

Sincerely,

Patrick Watters

Patrick Watters
Environmental Engineer
NC Superfund Section

cc: Neal Paul, MCB Camp Lejeune
Gena Townsend, US EPA Region IV
Diane Rossi, NC-DEHNR Wilmington Regional Office

North Carolina Superfund Section Comments
Remedial Investigation Report
Operable Unit 13 (Site 63)

1. Table ES-1

This table does not include surface water standards for the following contaminants.

Aluminum: 87 ug/L

Lead: 25 ug/L

2. Page ES-15

The State acknowledges that the production typically seen from the surficial aquifer probably would not be sufficient to support a potable source of drinking water. This conclusion is however irrelevant to any evaluation regarding compliance with North Carolina groundwater environmental standards or the need for any environmental corrective action.

3. Page 1-2, Section 1.2.3

This section states that there are 16 operable units at Camp Lejeune instead of 17 as indicated in the draft 1997 Site Management Plan. Figure 1-2 also needs to be revised to reflect the correct number of operable units.

4. Page 4-10, Section 4.4.1.4 and Figures 4-3 and 4-4

Figures 4-3 and 4-4 exclude most of the contaminants detected in the surface and subsurface soil due to the screening scheme described in Section 4.4.1.4. As a result, these figures are misleading and do not provide a true picture of the surface and subsurface soil contamination at Site 63. The State needs to have these figures revised to include ALL inorganics detected above the Region III screening levels and/or base background values.

5. Table 4-1

See comment number 1 regarding the NC Water Quality Standards for Aluminum and Lead.

May 22, 1996

TO: Patrick Watters
FROM: David Lilley *OBL*
RE: Comments prepared on the Baseline Human Health Risk Assessment, Site 63,
Verona Loop Dump, Camp Lejeune, NC

After reviewing the above mentioned document, I offer the following comments:

1. The original sampling results need to be included with this report. **It should be noted that the review of the BRA has been done without this information and the review should not be considered complete.** Please provide the above mentioned information.
2. Page 6-21, Trespassers and Future On-Site Residents: The inhalation rate for a child is listed as 12 m³/day. EPA Region IV's *Supplemental Guidance to RAGS, Human Health Risk Assessment Bulletin No. 3*, November, 1995, page 3-4 lists the inhalation rate for a child as 15 m³/day. Please adjust this document accordingly.
3. Page 6-19, Section 6.3.1.2: It is unclear to the reader how future construction workers could be exposed to subsurface soil but not surface soil. Please explain.