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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
100 ALABAMA STREET, S.W.
ATLANTA, GEORGIA 30303-3104

October 8, 1996

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Katherine Landman
Department of the Navy - Atlantic Division
Naval Facilities Engineering Command
Code 1823
Norfolk, Virginia 23511-6287

SUBJ: MCB Camp Lejeune
Draft Record of Decision
Operable Unit No. 6 -
Sites 36, 43, 44, 54 & 86

Dear Ms. Landman:

The Environmental Protection Agency (EPA) has completed its review of the above subject document. Comments are enclosed.

If you have any questions or comments, please call me at (404) 347-3016 or voice mail, (404) 347-3555, x-6459.

Sincerely,


Gena D. Townsend
Senior Project Manager

Enclosure

cc: Dave Lowns, NCDEHNR
Neal Paul, MCB Camp Lejeune

Comments**Site 36 - Institutional Controls?**

1. The narrative on page 8 states that there is lead and cadmium in the fish and crabs. However, the lead concentration in the fish do not pose a risk to the raccoon. What about the risk to the fish? Also, the crabs were not addressed. This is not acceptable.

The areas (sediment/soil) that demonstrate high concentrations of lead and cadmium should be reevaluated. The areas may require physical remediation or containment unless it can be demonstrated that there is an upgradient source. [IF THERE IS A SUSPECTED UPGRAIDENT SOURCE, THE AREA SHOULD BE INCLUDED IN A OU, IF APPROPRIATE, OR A NEW OU DESIGNATED.]

2. Add a sediment sample location figure or add the sampling points to figure 36-3.

3. Page 11 - 6th paragraph - 3rd sentence
replace "are difficult" with "is difficult"

Site 43 - No Action - (agree)**Site 44 - No Action - (agree)**

1. The contaminants in Edwards Creek appear to be from an upgradient source (Site 89) and the groundwater is being contaminated by the surface water.

Site 54 - Institutional Controls - (agree)

1. Page 23 - 4th paragraph
Add comma behind 1975.

2. Page 26 - 2nd paragraph
Change "iron were" to "iron was"

3. Table 54-1 - TYPO in concentration units

Site 86 - Groundwater extraction - on-site treatment ?

1. The use of the pump and treat technology for VOC remediation may not be the appropriate technology. There is a growing concern that this technology is suitable for containment only, not for achieving remediation levels.

If a comprehensive review was conducted during the Feasibility Study preparation and there is sufficient justification for selecting this alternative, then the following statement is not needed. Review the data from the previous installed system to determine if it is effective. There are publications that address TCE groundwater contamination from the Innovative Site Clean-Up Technologies. I will attempt to obtain a copy.