

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



August 16, 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 Site Evaluation Project Plans for Operable Unit 15,
Site 88, MCB Camp Lejeune, Jacksonville, NC

Dear Ms. Landman:

The NC Superfund Section has completed its review of the above referenced documents. Our comments are attached. 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

Attachment

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

North Carolina Superfund Section Comments
Site Evaluation Project Plans
Operable Unit 15 (Site 88)

Work Plan

1. Page 2-11, Section 2.2.5
This section mentions the existence of nearby fuel related USTs however, there is no indication of where these are in relationship to Building 25. Please provide additional information in the Work Plan about these USTs.
2. Page 4-3, Section 4.3.4
All Investigation Derived Waste (IDW) (including drill cuttings) must be containerized, sampled and analyzed to determine if it can be placed back on the ground. Visual assessment and/or HNu readings are not acceptable methods to the State.
3. Page 4-6, Section 4.6.4
The exposure scenarios for the soil pathway should include analyses for both the surface and subsurface soils.

Sampling and Analysis Plan

4. Page 4-3, Section 4.3.1.1
Note that it may be necessary to install wells deeper than the intermediate wells in order to determine the vertical extent of contamination.
5. Page 6-11, Section 6.8.3.1
Please see the earlier comment regarding the handling of Investigation Derived Waste (IDW).