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**UNITED STATES MARINE CORPS**

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PSC BOX 20004  
CAMP LEJEUNE, NORTH CAROLINA 28542-0004

IN REPLY REFER TO:  
6286

BEMD

**6 MAY 1997**

From: Commanding General, Marine Corps Base, Camp Lejeune  
To: Commander, Atlantic Division, Naval Facilities Engineering Command,  
(Code 1823), 1510 Gilbert Street, Norfolk, Virginia 23511-2699

Subj: BASIS OF DESIGN, OPERABLE UNIT NO. 6, SITE 36

Encl: (1) Comments on the Basis of Design, Operable Unit No. 6, Site 36, Marine Corps Base,  
Camp Lejeune

1. The subject document has been reviewed by the Installation Restoration Division. Our comments are contained in the enclosure.
2. It is requested that the Installation Restoration Division, Environmental Management Department, Marine Corps Base, Camp Lejeune be notified of the actions taken to accommodate the comments.
3. If you have any questions or comments, please contact Mr. Brian Marshburn, Installation Restoration Division, Environmental Management Department, at DSN 484-5068, or commercial (910) 451-5068.

A handwritten signature in black ink that reads "Scott A. Brewer".

**SCOTT A. BREWER, PE**  
By direction

## Comments on the Basis of Design Unit No. 6, Site 36, Marine Corps Base, Camp Lejeune

### General Comments

1. The proposed time-critical removal action (TCRA) at the site is based partly on the lowering of risk values associated with exposure to PCB-contaminated soil. However, according to this document and the Remedial Investigation report, calculated human and ecological risks were within acceptable levels. Did the surface and subsurface soil samples collected during the November and December, 1996, post-remedial investigations yield PCB concentrations that raised the human and ecological risk levels? If so, we are having difficulty locating any mention of this new study.

### Specific Comments

2. § 2.2.4 Remedial Investigation Results, page 2-3, bullet 1. The text is not clear. Copper, lead, and zinc are listed as the primary metals of concern, but there is no indication as to whether or not these metals are present in the surface, subsurface, or both. Also, iron concentrations in the subsurface soils, along with lead, is mentioned as a human health risk, yet is not one of the metals of concern.

3. § 2.3.1 Remedial Investigation Results, page 2-3, paragraph 2. It is stated that there are no unacceptable carcinogenic risks related to exposure to environmental media; however, it is documented that there is a risk to fishermen who may ingest fish and crabs obtained from Brinson Creek. Please clarify.

4. § 2.4 Remediation Levels and the TCRA Area of Concern, page 2-8, paragraph 2. When mentioning "areas" of contaminated surface and subsurface soil to be removed, replace "areas" with "volume". Also, change units of soil volumes to be removed from cubic feet to cubic yards.