

03.01-03/26/98-02233

DEPARTMENT OF THE NAVY

ATLANTIC DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
1510 GILBERT ST  
NORFOLK, VA 23511-2699

TELEPHONE NO:

(757) 322-4796

IN REPLY REFER TO:

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MAR 20 1998



CERTIFIED MAIL RETURN RECEIPT REQUESTED

North Carolina, Dept of Environment and Natural  
Resources, Superfund Section  
Attn: Mr. David J. Lown  
401 Oberlin Road, Suite 150  
Raleigh North Carolina 27605-1350

Re: Response to Comments, Draft Pre-RI Screening Study, Sites  
12, 68, 75, 76, 84, 85, and 87; MCB Camp Lejeune, North  
Carolina

Dear Mr. Lown:

Enclosed please find our responses to NCDENR comments on the  
subject document. Please let us know if the enclosed responses  
are acceptable. Also, your responses to our other  
recommendations would be greatly appreciated.

Based on the limited number of comments received and on the  
limited extent of the phase II field effort, the Navy will not  
produce a draft final version of the report. The phase II field  
effort is anticipated to start in April and will involve the  
following tasks:

Site 68

- Groundwater Sampling

Site 76

- Groundwater Sampling

Site 84

- Ensys Screening for Soils
- Surface Water and Sediment Sampling
- Defining the size of the lagoon

Additional field work will also be conducted at AST S-781  
located adjacent to Site 84 that was formally under the UST  
program. The scope of this work will be further defined over  
the next several weeks.

The results of the phase II effort will be incorporated in the  
final report and in the design for Site 84. The Navy has

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initiated work on the design for Site 85 and is expected to have  
the draft version completed by the end of April.

The Navy/Marine Corps appreciates your continued involvement in  
this project. Please direct any questions or comments to  
Ms. Maritza L. Montegross at (757) 322-4796.

Sincerely,



L. G. SAKSVIG, P.E.

Head

Installation Restoration Section  
(South)

Environmental Programs Branch

Environmental Division

By direction of the Commander

Enclosure

Copy to:

USEPA Region IV (Ms. Gena Townsend)

MCB Camp Lejeune (Mr. Neal Paul)

Baker Environmental (Mr. Matt Bartman)

MCB Camp Lejeune Admin Record file

**RESPONSE TO COMMENTS**  
**Draft Pre-Remedial Investigation Screening Study for**  
**Sites 12, 68, 75, 76, 84, 85, and 87**  
**MCB, Camp Lejeune, North Carolina**

**Submitted by the N.C. Department of Environment and Natural Resources**  
**February 4, 1998**

**COMMENTS BY DAVID LOWN**

- Site 84: Agreed. Additional soil, sediment, and surface water samples will be collected to further evaluate the extent of PCB contamination. The results of the sampling effort will be used to prepare the design specifications of the removal action. Following the removal, confirmation samples will be collected and analyzed..
- Site 85: Agreed. The Navy will move forward with the design for the removal action. Following the removal, confirmation samples will be collected and analyzed for full scan constituents (metals and organics).

**COMMENTS BY DAVID LILLEY**

1. Based on the site history, the constituents of concern were related to petroleum hydrocarbon releases and spills. There is no reported history of metals disposal or usage at the site. This information will be further documented in the report.
2. Selenium should be retained as a Site 68 surface water COPC as indicated on Table 5-7 and will be added to the text in Section 5.2.2.2. However, potassium is considered an essential nutrient and was not retained as a Site 68 surface water COPC as indicated on Table 5-7. Table 5-7 will be modified to remove the shading from the row indicating potassium as a COPC.
3. Agreed. The text will be modified to replace the words "surface water" with the word "sediment."
4. A discussion regarding the history of Site 84 and why subsurface soil was not sampled will be added to the text.
5. The text is incorrect in stating that ten sediment samples from Site 84 were analyzed for PCBs. Table 5-20 correctly indicates that seven samples were analyzed for PCBs. The text will be modified to state that seven sediment samples were analyzed for PCBs.
6. A discussion regarding the history of Site 85 and why the sampled media were analyzed only for inorganics will be added to the text.

7. Agreed. Since benzo(a)pyrene and dibenzo(a,h)anthracene were retained as Site 87 surface soil COPCs, all of the carcinogenic PAHs detected in Site 87 surface soil will be retained as COPCs (as per USEPA Region 4 Supplemental Guidance to RAGS, Human Health Risk Assessment Bulletin No. 1, 1995). The appropriate text, tables, and risk calculations will be modified accordingly to reflect this change.

8. Site 84 is located approximately 200 yards south of Highway 24 on the main side of MCB, Camp Lejeune, one mile west of the main gate entrance. The study area is bordered by Building 45, a former electrical substation. Due to the proximity of the site in relationship to the highway, it is highly unlikely that residential development would take place at Site 45. Furthermore, Site 84 is located in an industrial setting relatively close to the main gate entrance. Security concerns add to the unlikelihood that Site 84 would become a residential development. The text will be modified to include a discussion as to why a residential exposure scenario was not assessed for Site 84.

9. Agreed. Table 5-36 will be corrected to indicate that the ingestion rate for a child is 200 mg/day. Any affected risk calculations will be modified to reflect this change.

10. Agreed. Table 5-39 will be corrected to indicate the RfD for bis(2-ethylhexyl)phthalate is 2.0E-02 mg/kg/d. Any affected risk calculations will be modified to reflect this change.

11. According to the USEPA Region III Risk-Based Concentration (RBC) Table dated October 22, 1997, the RfD for gamma-chlordane is 5.0E-04 mg/kg/d. Table 5-39 will be corrected to indicate the most recent RfD. Any affected risk calculations will be modified to reflect this change.

12. Agreed. The note for chromium (4) will be changed to (5).

13. According to the USEPA Region III RBC Table dated October 22, 1997, the RfD for manganese is 2.3E-02 mg/kg/d. The source for this RfD is IRIS. Table 5-39 currently indicates the most recent RfD.

14. According to the USEPA Region III RBC Table dated October 22, 1997, the CSFI for alpha- and gamma-chlordane is 3.5E-01 kg\*d/mg. Table 5-39 will be corrected to indicate the most recent CSFI. Any effected risk calculations will be modified to reflect this change.

15. According to the USEPA Region III RBC Table dated October 22, 1997, the CSF for alpha- and gamma-chlordane is 3.5E-01 kg\*d/mg. Table 5-39 will be corrected to indicate the most recent CSF. Any effected risk calculations will be modified to reflect this change.

16. Agreed. The acronym "NCEA" on Table 5-39 will be defined.

17. Agreed. The reference for the RfD for 4-methylphenol will be changed to HEAST.

18. Agreed. The RfD for naphthalene has been withdrawn. This will be indicated on Table 5-39, and IRIS will be removed as the reference for the RfD.



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