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DEPARTMENT OF THE NAVY

TELEPHONE NO.

ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1510 GILBERT ST
NORFOLK, VA 23511-2899

(757) 322-4818

IN REPLY REFER TO:

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18232:KHL:swj

JUN 08 1998

North Carolina Department of Environment, Health,
and Natural Resources
Attn: Mr. Dave Lown
Superfund Section
P. O. Box 26787
401 Oberlin Road
Raleigh, North Carolina 27611-7687

Re: MCB Camp Lejeune
Draft Focused RI Report, Operable Unit No. 16
(Sites 89 & 93)
Response to Comments

Dear Mr. Lown:

Attached are Navy/Marine Corps responses to your comments on the above-referenced document. These comments will be incorporated into the final version of the document as indicated in the responses.

Please direct any questions to Ms. Katherine Landman at (757) 322-4818.

Sincerely,

L. G. SAKSVIG, P.E.

Head

Installation Restoration Section
(South)

Environmental Programs Branch

Environmental Division

By direction of the Commander

Attachment

Copy to:

- EPA Region IV (Ms. Gena Townsend)
- MCB Camp Lejeune (Mr. Mick Senus)
- Baker Environmental, Inc. (Mr. Matt Bartman)
- Activity Admin Record File

**Response to Comments Submitted by North Carolina Superfund Section
on the Draft Remedial Investigation Report CTO-0356
Operable Unit No. 16 (Sites 89 and 93)
MCB Camp Lejeune North Carolina**

1. The contours on Figure 3-1 will be corrected.
2. The EPA Soil Screening Guidance: Technical Background Document and User's Guide, as applied in the draft North Carolina Risk Framework will be used to evaluate soils collected from above the water table for the soil-to-groundwater pathway.
3. Conclusion 11 on Page 8-3 will be corrected.
4. Surface soil was not addressed in the Project Plans for the investigation of these sites. Operable Unit 16 is an industrialized area that is predominantly covered with either asphalt or hard-pack gravel. As a result, there is no direct exposure pathway with which to evaluate surface soil. Due to UST investigation findings discussed with state and federal regulators the sampling of surface soil was deemed unnecessary to meet the project objectives. This rationale will be presented in the text to explain the exclusion of surface soil from the human health risk assessment.
5. Based on Region IV guidance, all of the carcinogenic PAHs will be re-included as COPCs if one or more are retained as COPCs based on exceedance of criteria. The appropriate text, tables, and calculations will be revised accordingly. This will be done for both sites, all media investigated.
6. The sample results for semivolatiles and pesticides/PCBs will be included in Appendix H.
7. The comment is noted, and the recommended procedure will be considered in future BRAs.
8. Please refer to the response to comment number four. The same rationale will be presented in Section 7.0 text to explain the exclusion of the terrestrial habitat.
9. Table 6-5 will be corrected to reflect that the range of positive detections for trichloroethene is 0.3 - 2,400 µg/kg.
10. Table 7-1 will be corrected to reflect that the USEPA Region IV screening value for antimony is 160 µg/L.