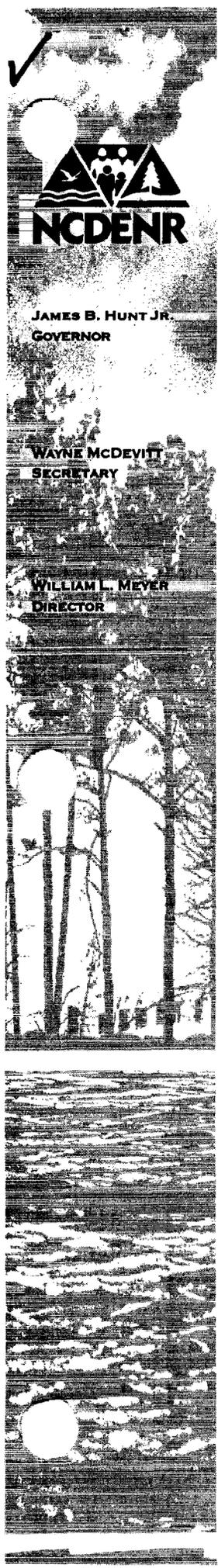


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NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT

April 28, 1998



Commander, Atlantic Division
Naval Facilities Engineering Command
Code 1823
Attention: MCB Camp Lejeune, RPM
Ms. Maritza L. Montegross
Norfolk, Virginia 23511-6287

Commanding General
Attention: AC/S, EMD/IRD
Marine Corps Base
PSC Box 20004
Camp Lejeune, NC 28542-0004

RE: NC Superfund Section Comments
Proposed Remedial Action Plan
OU06 (Sites 36, 43, 44, 54, and 86)
Marine Corps Base, Camp Lejeune

Dear Ms. Montegross:

The referenced document has been received and reviewed by the North Carolina Superfund Section and our comments are attached. Please call me at (919) 733-2801, extension 278 if you have any questions.

Sincerely,

David J. Lown, LG, PE
Geological Engineer
Superfund Section

Attachments

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

CTO-303/ARF

ATTACHMENT

NC Superfund Section Comments
Proposed Remedial Action Plan
OU06 (Sites 36, 43, 44, 54, and 86)
Marine Corps Base, Camp Lejeune

1. Page 7, RAA 2: Institutional Controls Paragraph. In addition to modification of the Base Master Plan institutional controls include recordation of a NOTICE OF INACTIVE HAZARDOUS SUBSTANCE OR WASTE DISPOSAL SITE at the Onslow County Courthouse as prescribed in NC General Statute 130A-310.8, an ARAR for this site. Additional institutional controls were discussed in the comments submitted on the Feasibility Study.
2. Page 7, RAA 3: Natural Attenuation Paragraph. To be consistent with EPA usage, this alternative should be referred to as Monitored Natural Attenuation.
3. Page 8, Last Sentence, First Paragraph. If natural attenuation is undetected (unmonitored?), how will you know it continues?
4. Page 9, Compliance with ARARs Paragraph. RAA 3: Natural Attenuation must comply with the action-specific requirements for natural attenuation found in NCAC 2L.0106 (I).
5. Page 19, Paragraph RAA2: Institutional Controls with Operational Controls. See Comment 1.
6. Page 19, Paragraph RAA3: NA with Operational Controls. See Comment 2.
7. Page 21, Paragraph Compliance with ARARs. See Comment 4.