

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

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November 1, 2001

Commander, Atlantic Division
Naval Facilities Engineering Command
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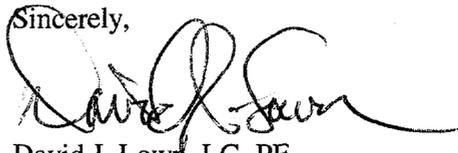
Attention: Mr. Kirk Stevens
Navy Technical Representative

RE: NC Comments on the Draft Final Phase I
SWMU Confirmatory Sampling Report
MCB Camp Lejeune

Dear Mr. Stevens:

The North Carolina Superfund Section has reviewed this document and our comments are attached. With minor exception, I agree with the sampling recommendations made in the report. Most of my comments can be addressed in the workplan for Phase II. If you have any questions, please call.

Sincerely,



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

Attachment

cc: Gena Townsend, USEPA
Neal Paul, MCB Camp Lejeune

NC Superfund Comments
Draft Final Phase I SWMU
Confirmatory Sampling Report
November 1, 2001

1. Mercury exceeds the soil-to-groundwater criteria at several sites. A number of these will be tested for other contaminants in addition to mercury. The potential of the soil to contaminate the groundwater with mercury may be evaluated using the data from these other SWMUs. If a problem is detected based on this sample set, then additional groundwater sampling for SWMUs contaminated only with mercury may be done in the future.
2. Where the present use of the SWMU is industrial, industrial screening criteria can be used if the site is not to be closed out. However, the site must be cleaned to unrestricted levels before the SWMU can be closed.
3. Calculations of site-specific, soil-to-groundwater criteria appear to be high by 2 orders of magnitude. Possibly the percent organic carbon was used in the equation rather than the organic carbon fraction. The site-specific, soil-to-groundwater calculations should be checked for the following SWMUs and any other SWMU where this calculation was used:

SWMU 256, Table 11
SWMU 043, Table 3, Table 4
SWMU 254, Table 3
SWMU 255, Table 3
SWMU 258, Table 4
SWMU 264, Table 3
SWMU 272, Table 4
SWMU 285, Table 7
SWMU 299, Table 3, Table 4
SWMU 300, Table 3
SWMU 302, Table 3, Table 4
SWMU 303, Table 3
SWMU 315, Table 3
SWMU 316, Table 3, Table 4
SWMU 318, Table 2

4. Page 4-2, Last Bullet. Should read, "USEPA Region IX residential PRG."
5. Page 4-5 Last Sentence. Should read, "USEPA Region IX residential PRG."

6. Table 5.1, SWMU 5 – 575 Rack. The text recommends no action. This contradicts Table 5.1, which recommends additional testing. Mercury exceeds the soil-to-groundwater criterion in only one of six samples from an area smaller than 0.25 acres. (See assumptions for soil-to-groundwater equation contained in EPA/540/R95/128.) The average, 0.0092 mg/kg, is below the soil-to-groundwater criterion; therefore, this SWMU probably doesn't require additional testing. When preparing the workplan for Phase II, use this factor to test if proposed sampling can be limited at other SWMUs.
7. Table 5.1, SWMU 043, Table 3. Column labeled "USEPA Region IX PRGs Residential Soil". Last 4 values in column should not be zero.
8. Table 5.1, SWMU 254 – 1408 Dumpster. Only 1 monitoring well is proposed, however, three monitoring wells are needed. With the calculation corrections discussed in Comment 3, several of these compounds are above the soil-to-groundwater criteria.
9. Table 5.1, SWMU 319. Unless additional data is given, soil samples are needed to confirm that contamination has been removed.