

North Carolina
Department of Environment and Natural Resources

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary
Dexter R. Matthews, Director



February 18, 2004

Commander, Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street (Building N-26)
Norfolk, Virginia 23511-2699

Attention: Mr. Daniel Hood
Navy Technical Representative
Code EV23KS

RE: Comments on the Draft Five-Year Review, MCB, Camp Lejeune NPL Site
All Operable Units (OUs), and Sites
Soil and Groundwater
Camp Lejeune, NC6170022580
Jacksonville, Onslow County, North Carolina

Dear Mr. Hood:

The NC Superfund Section has received and reviewed the Five-Year Review for all Operable Units (OU) and Sites at the Marine Corps Base (MCB), Camp Lejeune in Jacksonville, NC. The following comments are offered for the Work Team's consideration. If you have any questions or comments please contact me at (919) 733-2801 ext. 341.

General Comments

1. Please show the different areas of the base (Hadnot Point, Camp Geiger, Courthouse Bay, Camp Johnson, Montford Point, Air Station, etc.) on Figure 1-1 as referenced throughout the report.

Specific Comments

1. Should the "Remedy Functioning?" column of Table ES-1 State that "no additional remedies were warranted?" This does not tell whether the remedy is functioning properly and is somewhat confusing. It should state what the remedy is or isn't and whether it is functioning as planned. If there is no remedy state that fact.
2. The Protectiveness column of Table ES-1 for Site 76 and Site 85 should note Site 76 and Site 85 rather than "Site 75". These changes need to be made in Table 3-1 also.

1646 Mail Service Center, Raleigh, North Carolina 27699-1646
Phone: 919-733-4996 \ FAX: 919-715-3605 \ Internet: www.enr.state.nc.us

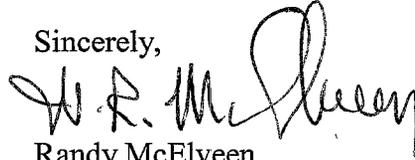
3. Typographical errors were noted in the fourth paragraph on page 1-8 referring to Waste water "Waster" and on page 2-5 "tofor". Please make appropriate changes.
4. Table D-3 is for sites 6 and 54 not site 74 as indicated by Question B: on page 2-44.
5. The last paragraph on page 2-60 states that VOCs were detected in groundwater and surface water at Site 44. As you know site 44 is just downgradient of Site 89 and the VOCs from Site 89 have contaminated Edwards Creek and these VOCs have been detected on the other side of the creek where site 44 is located. Therefore, the VOCs detected in groundwater and especially in the surface waters adjacent to Site 44 are likely to be from Site 89 rather than from Site 44.
6. The 4th paragraph on page 2-64 and paragraphs on page 2-65 and 2-66 state that "a LUCIP will be implemented for intrusive activities within the former soil impacted area" of the former burn pit at site 54. Why would we put a Land Use Control Implementation Plan (LUCIP) on a Site that has been cleaned up and the soil confirmed to the regulatory standards and groundwater confirmed to have not been impacted by the site? This language should be removed from the Five-Year Review document unless it can be made clear why a LUCIP would be required or desired. This issue will be addressed in the final Record of Decision (ROD).
7. The typo. at the bottom of page 2-66 should be corrected ("to no").
8. A typo. was also noted in paragraph 2.17.3.3 on page 2-123 ("at planned at"). Please make appropriate corrections.
9. Site 94 is not identified on Figure 2-3 of Site 78 as stated in Section 2.18.1 on page 2-125. Please include the estimated area of Site 94 on Figure 2-3 of Site 78.
10. Some inconsistencies with Figures and sites exist on page 2-148 for Site 76. The text refers to site 75 instead of site 76 and reference Figure 2-39 is labeled Site 68 instead of Site 76.
11. The new NC DENR project manager was not aware that the NFA Decision Document was pending concurrence from the NC DENR as stated in the last paragraph on page 2-150. This document and concurrence will be reviewed and a concurrence letter sent by the NC DENR in the next few weeks.
12. There is no indication in the section of the Review for Site 87 on pages 2-153 – 2-155, that the hypodermic needles and vials of white powder were excavated and properly disposed of. Do we have documentation that resolves this concern? If not we need to discuss this issue with the partnering team at our March meeting.

Mr. Kirk Stevens
2-18-2004
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13. Labels or well locations shown on Figures 2-5 and 2-6 are blurred and unreadable. Please improve these drawings for the final Five-Year Review document.

If you have any questions or comments, please contact me, at (919) 733-2801, extension 341 or email randy.mcelveen@ncmail.net

Sincerely,

A handwritten signature in black ink, appearing to read "Randy McElveen". The signature is fluid and cursive, with a large initial "R" and "M".

Randy McElveen
Environmental Engineer
NC Superfund Section

Cc: Dave Lown, NC Superfund Section
Rick Raines, EMD/IR
Gena Townsend, USEPA