

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



March 30, 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 SWMU 43 RCRA Facility Investigation Report
MCB Camp Lejeune, NC
Soil and Groundwater
Camp Lejeune, NC6170022580
Jacksonville, Onslow County, North Carolina

Dear Mr. Hood:

The NC Superfund Section has received and reviewed the Draft SWMU 43 RCRA Facility Investigation Report, dated January 2004, for the Camp Lejeune, MCB Superfund Site located in Jacksonville, NC. The following comments are offered for the Work Teams consideration. If you have any questions or comments please contact me at (919) 733-2801 ext. 341.

General Comment

The conclusions of the Reports are generally appropriate based on the findings of the Requests for Information (RFIs) and Confirmatory Sampling Investigation (CSI) results discussed in the RCRA Solid Waste Management Unit (SWMU) 43 RCRA Facility Investigation Reports. The State agrees with the recommendations to complete additional delineation of the DDT and Alpha and Gamma Chlordane in surface and subsurface soils. It is also appropriate to complete additional and extensive groundwater sampling in the area of the SWMU to confirm the heptachlor epoxide contaminants in groundwater. The State also highly recommends the corrective measures study (CMS) for surface soil at the SWMU.

The State does not recommend additional Baseline Ecological Risk Assessment work at this time. It is more appropriate to evaluate the extent of the contamination away from the facility that could potentially pose a risk to terrestrial flora and fauna and upper tropic level receptors from 4,4 DDD and daughter products, and dieldrin, alpha and gamma-chlordane and

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chromium. The contamination at SWMU 43 appears to be limited to the facility area and is a small area of contamination. If the contaminants have not moved into the surrounding wooded areas the State sees no reason to complete an expensive study of ecological receptors that are not impacted.

It is recommended that the CMS study be completed and implemented as soon as possible, thus limiting the future impacts from the site to groundwater and the surrounding ecology.

Specific Comments

1. The word Work is misspelled in the last sentence of the first paragraph on page 1-4.
2. The last paragraph on page 7-35 recommends a Baseline Ecological Risk Assessment (BERA) for impacts to Terrestrial flora and fauna and upper tropic level receptor from SWMU contamination. As noted above, the State would like to recommend that we complete the additional soil and groundwater delineation and CMS study and an economic cost analysis to determine whether it is appropriate to complete a BERA at the site. After the surface soil is removed or treated ecological and human health risks will no longer exist.
3. The lines of evidence for the presence of pesticides in groundwater as listed on page 8-2 is subjective and inappropriate at this point in the investigation. In fact it is very common to see heptachlor epoxide, alpha and gamma chlordane in groundwater at low concentrations that cannot be detected by soil analytical methods in subsurface soil. The turbidity of the groundwater samples being less than 10 NTUs supports this position. The Soil to Groundwater Concentrations (STGC) are present in surface soil and should be taken as a real potential for impact to groundwater. These contaminants are much more mobile in groundwater and leach more readily than DDT and its daughter products.

As you know, when surface soil contamination is removed or treated, it is very common for the associated groundwater contaminants to decrease significantly over a short period of time. This is especially true for pesticides and other less mobile contaminants.

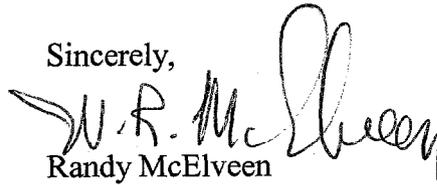
If you have any questions or comments, please contact me, at (919) 733-2801, extension 341 or email randy.mcelveen@ncmail.net

Mr. Daniel Hood

03-30-2004

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Sincerely,

A handwritten signature in black ink, appearing to read "W.R. McElveen". The signature is written in a cursive style with a large, looping initial "W".

Randy McElveen
Environmental Engineer
NC Superfund Section

Cc: Dave Lown, PE, PG, NC Superfund Section
James Culp, PE
Rick Raines, PE, EMD/IR