

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 15, 2006

Commander Atlantic Division
Naval Facilities Engineering Command
6506 Hampton Blvd.
Norfolk VA 23508-1278

Attention: Rodger W. Jackson, P.E.
Naval Facilities Engineering Command Atlantic
6506 Hampton Blvd.
NC/Caribbean IPT
Building C, 3rd Floor
Norfolk, Va. 23508-1278

RE: Comments on the RCRA Draft SWMU 261/297 & 423 Interim Measures
Work Plan
Dated September 2005, Received by NC Superfund on February 3, 2006
Soil and Groundwater
Camp Lejeune, NC6170022580
Jacksonville, Onslow County, North Carolina

Dear Mr. Jackson:

The NC Superfund Section has received and reviewed the Draft Solid Waste Management Units (SWMUs) 261/297 and 423 Draft Interim Remedial Measures Work Plan for the Camp Lejeune, MCB 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) 508 8467.

Specific Comments.

1. Based on the excavation area of SWMU 261/297 as shown on Figure 1.4 and as discussed in Section 4.2.2 on page 4-3, it is recommended that 3 floor samples be collected from the excavation in the vicinity of the Former UST. This will provide end and midpoint samples at the base of the excavation.
2. The proposed excavation for SWMU 423 as discussed at the top of page 4-4 is only 20 feet by 20 feet, however, the estimated extent of impacted soil as shown on Figure 1.5 is 100 feet by 50 feet. Please clarify in the work plan using the soil boring data why this difference came about.

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

Mr. Rodger Jackson

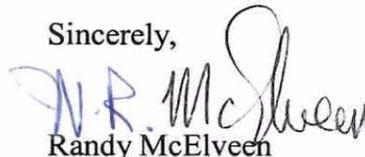
2-15-2006

Page 2 of 2

3. Based on a 20 feet by 20 feet floor dimension for SWMU 423, it is recommended that 2 floor samples be collected as discussed on page 4-4.
4. Soil characterization for disposal as discussed in Section 5.1.1 on page 5-1 should be completed consistent with the NC Hazardous Waste Section Contained in Rule. The contained in Rule requires a minimum of 2 samples at appropriate depths in the soil stockpile for each roll-off-box or for every 25 cubic yards of waste. This will require a minimum of 4 samples at each site. See the attached copy of the Contained in Rule. If you know of other documents within RCRA that allow less frequent sampling please provide the reference and page.
5. Figure 1.2 has SWMU 261/297 in the wrong location. SWMU 261/297 is located at the south west end of Building 1780. See Figure 1.4. Please make appropriate corrections in the Final Work Plan.
6. Please make sure that any corrections made in Work Plan base on the above comments are also made in Appendix B, Sampling and Analysis Plan.
7. Dave Lilley with the NC Superfund Section will review the Health and Safety Plan and may have some comments. This should not hold up the work. The health and safety of all workers is the responsibility of Shaw for all work performed. The Superfund review is strictly a courtesy review.

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

Sincerely,



Randy McElveen
Environmental Engineer
NC Superfund Section

Attachment

Cc: Dave Lown, PE, PG, NC Superfund Section
Louise Palmer, PE
Ken Cobb, EMD/RCRA