

M67001.AR.004335
MCB CAMP LEJUENE
5090.3a

LETTER AND COMMENTS ON THE DRAFT INTERIM REMEDIAL ACTION COMPLETION
REPORT FOR OPERABLE UNIT 16 (OU 16) SITE 93 AT MCB CAMP LEJEUNE NC
12/05/2008
NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES

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



December 5, 2008

Attn: Gary Tysor
NAVFAC Midlant Environmental RPM, Camp Lejeune
Marine Corps North Carolina IPT
6506 Hampton Blvd
Norfolk, VA 23508-1273

RE: Comments on the Draft Interim Remedial Action Completion Report
Operable Unit (OU) # 16, Site 93 MCB Camp Lejeune, NC
Soil and Groundwater
Camp Lejeune, NC6170022580
Jacksonville, Onslow County, North Carolina

Dear Mr. Tysor:

The NC Superfund Section has received and reviewed the OU #16 (Site 93) Draft Interim Remedial Action Completion Report (IRACR), dated October 2008, for the Camp Lejeune, MCB Superfund Site located in Jacksonville, NC. The following comments are offered for the Partnering Teams consideration. If you have any questions or comments please contact me at (919) 508 8467.

Specific Comments

1. The last sentence of the first paragraph of the Introduction should state Site 93, not 'OU 16' regarding the IRACR Results included in this report. Please make appropriate corrections here and throughout the report.
2. The last sentence of the second paragraph on page 1-5 references ". . . filing a Notification of inactive Hazardous or Waste Disposal per North Carolina General Statute (NCGS) 130A-310.8." Please replace this reference with the following reference information. ". . . filing a notification of a waste disposal site per North Carolina General Statute (NCGS) 143B-279.9 and/or 143B-279.10."
3. Section 6.3 on page 6-5 discusses the designed reagent dosing [was to] achieve the reduction in COC concentrations to 2L standards (correct the typos in this paragraph as well). The reagent design may have been aimed at the 2L Standards but the objective of the remedy was to reduce the COCs by 90% in order to apply MNA as estimated by the Biochlor Model (see the bottom of page 63).
4. The Recommendations, Section 6.8, recommended that quarterly LTM Sampling. Quarterly groundwater sampling for the first year is appropriate. However, if COC

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

Mr. Gary Tysor
12-5-2008
Page 2 of 2

concentrations stabilize during the first year semi-annual sampling in the second year and perhaps annual sampling in years three and four followed by semi-annual sampling in year five would be sufficient to determine if MNA is occurring. Therefore, it would be appropriate to set up a review of the sampling results after the first year of quarterly sampling to determine if reducing sampling frequency would be acceptable.

5. The State concurs with recommendations in Section 6.8.
6. The remediation schedule (Figure 7-1) is not provided in the text or the figures of the report in the Project Files section of the Enterprise Web page document. Table 3-1 is probably sufficient for dates related to RA work for reference in this IRACR.

If you have any questions or comments, please give me a call at (919) 508 8467 or reply to this email randy.mcelveen@ncmail.net.

Sincerely,



Randy McElveen
Environmental Engineer
NC Superfund Section

Cc: David Lown, NC Superfund Section
Bob Lowder, EMD/IR
Gena Townsend, US EPA