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MCB CAMP LEJEUNE
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LETTER AND U S EPA REGION IV COMMENTS ON THE DRAFT PROPOSED REMEDIAL
ACTION PLAN FOR OPERABLE UNIT 14 SITE 69 MCB CAMP LEJEUNE NC
6/13/2012
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303

June 13, 2012

NAVFAC Atlantic
Attn: David Cleland: OPQE3
USMC North Carolina IPT, EV Business Line
6506 Hampton Blvd
Norfolk, VA 23508-1273

SUBJ: Marine Corps Installations East
MCB Camp Lejeune
Draft Proposed Remedial Action Plan
Operable Unit 14, Site 69

Dear Mr. Cleland:

The Environmental Protection Agency (EPA) has completed its review of the above subject document, dated May 2012. The comments are enclosed.

If there are any questions, I can be reached at (404) 562-8538.

Sincerely,

Gena Townsend

Digitally signed by Gena Townsend
DN: cn=Gena Townsend, o=Superfund Division,
Federal Facilities Branch, ou=Environmental
Protection Agency, email=townsend.gena@epa.gov,
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Date: 2012.06.13 09:36:10 -0400

Gena D. Townsend
Senior Project Manager

cc: Randy McElveen, NCDENR
Charity Rychak, MCB Camp Lejeune

General Comments

1. Overall most of the content in this Proposed Remedial Action Plan [hereinafter Proposed Plan or PRAP] is useful and provides information required by the NCP or EPA guidance. However, there are some areas that are not entirely consistent with the EPA guidance or the NCP with respect to addressing principal threat wastes (PTW). [See specific Comments below]
2. Containment remedy is appropriate for most historic unregulated municipal or solid waste landfills; however if there is source material that is contaminating groundwater then hydraulic isolation that limits infiltration through the buried wastes/soil is often necessary. Accordingly, certain RCRA Subtitle C landfill requirements for a final cover and post-closure care are considered relevant and appropriate and should be noted in the ARARs discussion portion of the PRAP. Also, when PTW is present, the EPA expects to use treatment to the maximum extent practicable. [See specific Comments below]

Specific Comments

1. **Site Description and Background, Page 3** – The text states “A second documented source ...), however, there is not a reference to the source. Cite the documented source(s) within the text.
2. **Nature and Extent of Contamination, Soil, Page 5** – Provide more details on the nature of the contaminants known or thought to be present in the soils and buried waste similar to that in Section 2.1. Add the following sentence to the end of the first paragraph: “Depending on the concentrations of hazardous constituents in the soil and buried wastes, such soil and waste could be considered RCRA hazardous waste or TSCA PCB waste if removed from the landfill.”
3. **Principal Threats, 1st paragraph, Page 7** – As described in the EPA’s *Guide to Principal Threat and Low-level Threat Waste* (EPA OSWER Pub.9380.3-06FS, Nov. 1991), liquids (e.g., in buried drums) NAPL and/or high-concentration of toxic compounds in soils are considered PTW. Please add a sentence to reflect that above reference guidance and the examples of source materials that constitute PTW several of which are present in the Site 69 landfill.
4. **Principal Threats, 2nd paragraph, Page 7** – Revise the first sentence to specify that CA is PTW because it is highly toxic, and potentially fatal should exposure occur. Also, relocate the next three sentences discussing existing LUCS that prevent exposure to buried wastes and contamination into Section on the Site Characteristics. These LUCs are not relevant for whether sources are PTW. Toxicity is determined by the inherent characteristic of the compounds and should exposure occur. Lastly, as noted in the General Comment #2 above, although containment is generally a presumptive remedy for municipal landfills, under the NCP at 40 CFR § 300.430(a)(iii)(A), EPA expects to use

treatment to address the principal threats posed by a site, wherever practicable. Therefore, revise the text to indicate that for wastes other than PTW, engineered remedies including those that provide containment (including hydraulic isolation) of the buried wastes is generally expected by EPA. [Reference the NCP at 40 CFR 300.430(a)(1)(iii)]

5. **Scope and Role of Response Actions, Page 8** – Provide description of the 2000 IROD remedy and how the final action taken under this ROD will overlap and/or supersede that interim remedy with respect to soil contamination and LUCs. Also, should indicate that the Treatability Study was completed (include the area and contaminants addressed) and it was not effective at treating the source material, therefore additional action is necessary.
6. **Threshold Criteria, Overall protection of HH&E Soil, Page 12** – As noted above, capping is the presumptive remedy for most unregulated solid waste or municipal landfills; except that when PTW is present, EPA expects treatment or removal of such source materials to the maximum extent practicable. Also, if source material is resulting in groundwater contamination then hydraulic isolation (impermeable cover) is needed for any containment remedy. Revise text accordingly.

[Included in the revised text should be statements about the impermeable cover part of the remedy and the impacts of removing CA without a disposal option.]

7. **Compliance with ARARs, Page 12** – Add few sentences explaining ARARs for each of the described remedial alternatives as provided in the Final FS. Indicate that the NCDENR 2L and EPA SDWA MCLs are chemical-specific ARARs that were used to establish groundwater cleanup levels. Also, that certain RCRA Subtitle C landfill closure and post-closure care requirements are relevant appropriate for the capping alternative in order to provide hydraulic isolation of the source materials.
8. **Reduction of TMV through Treatment, Page 13** – Include brief introductory sentence that specifies the CERCLA Section 121(b) (1) preference and NCP requirement to treat PTW and that the ROD must include an explanation why treatment was not utilized to the maximum extent practicable. [Ref. 40 CFR 300.430(f)(1)(ii)(E) and 300.430(f)(5)(ii)(F)]

Also, revise the first sentence to indicate that “Alternative 3 [Capping] does not include treatment of soil or wastes that are considered PTW and does not reduce toxicity or volume.” Revise last sentence to indicate that Alternative 4 would remove the PTW which reduces toxicity and volume as well as the mobility. Indicate that a Treatability Study was performed to address some source material but that it was not entirely effective, which may indicate that treatment (at least that technology) is not practicable for some of the PTW.

9. **Preferred Alternative, Page 15** – As noted above, containment remedy may be appropriate for certain landfills (DoD municipal or solid waste landfills) but EPA expects treatment to the maximum extent practical when there is presence of PTW within the

landfill. Revise text to better clarify this important distinction. Also, revise to indicate that military solid waste landfills “addressed” as opposed to ‘regulated’ under CERCLA. Revise sentence to indicate that a multilayer cap with an impermeable layer meeting relevant RCRA Subtitle C landfill cover requirements will be installed to provide hydraulic isolation of the buried wastes and soils that are source materials for contaminating groundwater.

10. **Preferred Alternative, MNA Page 15** – Consistent with EPA guidance on use of MNA as a remedial component, the Navy must specify that based upon multiple lines of evidence that it expects that natural processes will attain cleanup levels within a reasonable timeframe and should indicate the number of years.

[Use the language included in the FS that identified plume stabilization and SW discharge will meet the NCSWQS.]

11. **Preferred Alternative, bulleted text, Page 16** – Revise as follows: Prevent potential exposure to contaminated subsurface soil and buried wastes (some of which are considered principal threat wastes).” Also, revise third bullet as follows: “Maintain the integrity of any existing or future monitoring or remediation system at the site (including but not limited to groundwater monitoring wells, fences, signs and landfill cover).”
12. **Preferred Alternative, 3rd paragraph, Page 16** – The Preferred Alternative is not utilizing alternative treatment technologies to the maximum extent practicable and therefore the text should be revised accordingly. Instead, the Navy must explain in the ROD (and preferably in this PRAP) why treatment was not practicable. [See above comments]
13. **Preferred Alternative, last paragraph, Page 16** – Consider subsection entitled Five-Year Review so that the reader has a clear understanding that this activity is performed separately from the implemented remedy.
14. **Community Participation** – Revise to update the target calendar dates and indicate that the Navy has prepared the PRAP in view of the public participation requirements specified in the NCP at 40 CFR 300.430 (f)(3) and 40 CFR 300.515(e).