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**NORTH CAROLINA DEPARTMENT OF  
ENVIRONMENT AND NATURAL RESOURCES**

November 18, 1998

**DIVISION OF WASTE MANAGEMENT**



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Code 1823

Attention: MCB Camp Lejeune, RPM  
Ms. Katherine Landman  
Norfolk, Virginia 23511-6287

Commanding General

Attention: AC/S, EMD/IRD  
Marine Corps Base  
PSC Box 20004  
Camp Lejeune, NC 28542-0004

RE: NC Superfund Section Comments  
Draft Benchscale Treatability Study Report  
Operable Unit No. 12 (Sites 3)  
Marine Corps Base, Camp Lejeune

Dear Ms. Landman:

We have reviewed this document and have the following general comments:

1. For future reference, remediation goals should not be set lower than appropriate analytical detection limits (e.g., 0 for 4-nitrophenol).
2. If the contaminants are biostabilized then they are not likely to leach to groundwater. Cleanup goals based on protection of the soil-to-groundwater pathway can be modified (increased to higher levels) if it can be demonstrated that the contaminants will not leach to groundwater. However, the remediation goals should not be greater than levels safe for direct residential exposure (usually Region III RBCs).

Please call me at (919) 733-2801, extension 278 if you have any questions.

Sincerely,

David J. Lown, LG, PE  
Geological Engineer  
Superfund Section

Attachment

cc: Gena Townsend, US EPA Region IV  
Neal Paul, MCB Camp Lejeune  
Diane Rossi, DENR - Wilmington Regional Office