

State of North Carolina  
Department of Environment,  
Health and Natural Resources  
Division of Waste Management

James B. Hunt, Jr., Governor  
Jonathan B. Howes, Secretary  
William L. Meyer, Director



March 5, 1997

Ms. Katherine Landman  
Department of the Navy - Atlantic Division  
Naval Facilities Engineering Command  
Code 1823  
Norfolk, Virginia 23511-6287

SUBJECT: MCB Camp Lejeune  
North Carolina Superfund Section Comments  
Draft Site Investigation Work Plan  
Site 10 - Original Base Landfill

Dear Ms. Landman:

The NC Superfund Section appreciates the opportunity to review and comment on the referenced document for the Site 10 Landfill. The following comments refer to the WORK PLAN:

- 1) Page 2-4, Section 2.1.4, Paragraph 3. Should this sentence refer to Site 63?
- 2) Page 2-11. Section 2.2.5.1. The results of surface and subsurface soils are compared to Region III Risk-Based Concentrations. These levels are good for evaluating the risk from direct contact. In addition to exposure from direct contact, leaching from soil to groundwater must be considered. The Draft *North Carolina Risk Analysis Framework* - November 1996, provides a reference point for discussing this issue. The Framework has not been implemented, but the discussion of developing target concentrations for soils that are protective of groundwater for potential residential use is applicable. Target concentrations for soils that leach to groundwater are in Table 3.4 and Appendix 9.
- 3) Page 3-2. Section 3.1.2.1. If chlorinated solvents are expected, it may be prudent to collect additional data that can be used to justify a natural attenuation remedy. While this information is not required at this stage of the investigation, it may be useful in determining the direction of the investigation. Table 2.1 of the Air Force *Technical Protocol for Evaluating Natural Attenuation of Chlorinated Solvents in Groundwater*, provides information on the types of analyses that would be useful.
- 4) Page 4-1. Section 4.3.1, First Bullet. The second sentence is confusing and needs to be reworded.

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- 5) Page 4-5, Section 4.6.1.2, First Paragraph. It is proposed that soil and groundwater at Site 10 will be characterized. Will surface water be sampled and characterized and if no, why not?
- 6) Figure 2-3. This figure is not legible.
- 7) Figure 2-6. Is this a topographic contour map? The type of contour should be indicated.

The following comments refer to the FIELD SAMPLING AND ANALYSIS PLAN:

- 8) Page 6-1, Section 6.0. The ESD SOP was updated in May 1996. Please refer to this document and modify the sampling procedure accordingly.
- 9) Page 6-3, Section 6.3.1. Please refer to the ESD SOP (May 1996) for low-flow purging procedures.
- 10) Page 6-7, Section 6.7.4. Full TCL organics and TAL metals may be necessary for IDW soil cuttings, depending on the disposal method selected.
- 11) Page 6-8, Section 6.7.9. See comment 9.
- 12) Page 7-1, Section 7.0. See comment 7.

The following comments refer to the QUALITY ASSURANCE PROJECT PLAN:

- 13) Page 8-2, Table 8-1. Water samples must be analyzed according to the EPA's Low Concentration Organic Analytical Service for Superfund. The water CRQL's listed in this table are too high for most of the compounds in North Carolina's groundwater standards (15A NCAC 2L.0200).

Please call me at (919) 733 2801, extension 349 if you have any questions.

Sincerely,



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Geological Engineer  
Superfund Section

cc: Gena Townsend, US EPA Region IV