

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

**DIVISION OF WASTE MANAGEMENT**

March 25, 1999

Commander, Atlantic Division  
Naval Facilities Engineering Command  
1510 Gilbert Street (Building N-26)  
Norfolk, Virginia 23511-2699

Attention: Ms. Maritza Montegross  
Navy Technical Representative  
Code 18233

Commanding General  
PSC Box  
Marine Corps Base  
PSC Box 20004  
Camp Lejeune, NC 28542-0004

Attention: AC/S, EMD/IRD

RE: NC Superfund Section Comments  
Draft No Further Response Action Plan  
Decision Document - Site 12  
Marine Corps Base, Camp Lejeune

Dear Ms. Montegross:

We reviewed of this document and submit the following comments:

1. While Site 12 may not require additional investigation under CERCLA, we do not agree that this site will require "no additional evaluation" (Page 1-3, Section 1.2, last paragraph). Section 1.2 of the report indicates that Site 12 is currently being used for disposal of unserviceable or defective ordnance. "Additionally," the report states, "it was learned that the range was used, for a short time, as a target range upon which aircraft would drop 'dummy' bombs." With reference to BTEX, VOCs, and SVOCs the investigation indicates that the site poses no significant risk to human health and the environment, and we agree. However, with respect to metals and UXO, the site was not evaluated. Because the site is still active, full evaluation under CERCLA may not be appropriate. However, the site should probably be evaluated along with Camp Lejeune's other ranges. Modify the last paragraph of Section 1.2 to indicate that further investigation and evaluation is needed.

Ms. Montegross  
3-25-99  
Page 2

2. Attached are our comments on risk assessment in the NFRAP and the Final Pre-Remedial Investigation Screening Study for Site 12.

We appreciate the opportunity to review this document. Please call me at (919) 733-2801, extension 278 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "David J. Lown". The signature is fluid and cursive, with the first name "David" being the most prominent.

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

Attachments

cc: Gena Townsend, US EPA Region IV  
Neal Paul, MCB Camp Lejeune

NORTH CAROLINA DEPARTMENT OF  
ENVIRONMENT AND NATURAL RESOURCES

DIVISION OF WASTE MANAGEMENT

March 18, 1999



JAMES B. HUNT JR.  
GOVERNOR

WAYNE McDEVITT  
SECRETARY

WILLIAM L. MEYER  
DIRECTOR

TO: David Lown

FROM: David Lilley

DBL

RE: Comments prepared on the No Further Response Action Plan  
Decision Document, Site 12, MCB Camp Lejeune, NC.  
April 17, 1998

After reviewing the above mentioned document, I offer the following  
comment:

1. Without the comments in the Baseline Risk Assessment addressed, it is not possible to agree or disagree with the No Further Response recommendation of this report.

DL/dl/word/ra1/22

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March 18, 1999

JAMES B. HUNT JR.  
GOVERNOR

TO: David Lown

WAYNE McDEVITT  
SECRETARY

FROM: David Lilley

DBL

RE: Comments prepared on the Baseline Risk Assessment  
Contained within the Final Pre-Remedial Investigation  
Screening Study, Sites 12, 68, 75, 76, 84, 85, and 87, MCB  
Camp Lejeune, NC.  
November, 1998

WILLIAM L. MEYER  
DIRECTOR

**NOTE: The only portion of this document reviewed was  
the Site 12 BRA.**

After reviewing the above mentioned document, I offer the following  
comments:

1. Page 5-10, site 12 soil: It is unclear to the reader why soil samples were analyzed only for BTEX at Site 12. Why was a metals analysis not conducted for groundwater at Site 12? These comments were made on the draft version of this document and not addressed. Please explain.
2. Page 5-10, site 12, soil: The soil sample data was not provided in Appendix I, and therefore could not be reviewed. Please submit this data for review.

DL/dl/word/ra1/21