



North Carolina Department of Environment and Natural Resources
Division of Waste Management

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

March 4, 2009

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 Proposed Remedial Action Plan (PRAP)
OU#10, Site 35 MCB Camp Lejeune, NC
NC6170022580
Jacksonville, Onslow County, North Carolina

Dear Mr. Tysor:

The NC Superfund Section has received and reviewed the Draft Proposed Remedial Action Plan (PRAP) for OU#10, Site 35 at Camp Lejeune, MCB Superfund Site, located in Jacksonville, NC. The following comments are recommended for your consideration.

1. Figure 2 of the Site PRAP is mislabeled as Site 73 Conceptual Site Model.
2. Figure 2 shows concentrations greater than 0.5ug/l as blue and concentrations of greater than 5ug/l as a light green. The proposed treatment area is shown as only blue. This would give the false impression that the red hashed area south of building G560 has greater CVOC concentrations than the groundwater in the field area proposed for Air Sparging. Please add additional colors with greater concentrations to this figure or make other appropriate changes to clarify this misrepresentation. Do we have wells in the area south of building G560 that have been analyzed during the recent sampling events? Why does the Figure 2 show the high concentrations to the south of G560? Do we need to treat the groundwater in this area as well? We need to discuss the groundwater concentrations in the area south of building G560 at the next Partnering meeting.
3. The abbreviation for Highway (HWY) on Figure 4 should be corrected from HSY 17 Bypass to HWY 17 Bypass.
4. The State representatives fax number included on page 11 of the draft PRAP is noted as (919) 7332801. This used to be my phone #. The Superfund fax number is (919) 7334811. Please make appropriate changes.

Mr. Gary Tysor

March 4, 2009

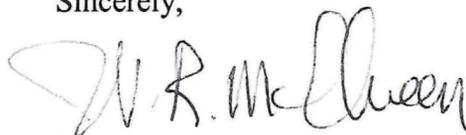
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5. The bottom of page 1 and Page 11 reference the Administrative Record for Camp Lejeune as being located on a the following WEB portal <http://lejeune.lantops-ir.org/>. In order to access the web portal a user name and password are required. Please provide a user name and password in the PRAP and anytime the Lejeune Lantops IR Web Portal is referenced. When you open the site it is not clear how to access the site 35 or 73 documents. Many of the more recent documents (SRI, PRAP, etc.) and sample data from the 2008 sampling events are not in the Administrative Record (AR) files.

All documents leading to this PRAP and including the final PRAP must be included in the Administration Record files. Please place all Administrative Record documents in the AR files on the referenced web portal and provide a clear and simple process for completing a search, for the Site 35 documents, in the final PRAP where the web portal is referenced. This should include an example search that works for anybody. The Administrative Record file and search method has been a continued issue of concern for Camp Lejeune. As we all know this is a critical issue that is required by CERCLA and the NCP for the general public. Please make appropriate corrections regarding this web portal and resubmit for review prior to submitting the final PRAP.

If you have any questions or comments, please contact me, at (919) 508-8467 or email randy.mcelveen@ncmail.net

Sincerely,



Randy McElveen
Environmental Engineer
NC Superfund Section

Cc: Dave Lown, NC Superfund Section, electronic only
Bob Lowder, EMD/IR
Gena Townsend, USEPA
Bryan Beck, NAVFAC