

Division of Waste Management

Michael F. Easley, Governor  
William G. Ross Jr., Secretary  
Dexter R. Matthews, Director



November 24, 2008

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 Non-Time Critical Removal Action (NTCRA) Report  
OU#10, Sites 35 MCB Camp Lejeune, NC  
NC6170022580  
Jacksonville, Onslow County, North Carolina

Dear Mr. Tysor:

The NC Superfund Section has received and reviewed the Draft Non-Time Critical Removal Action (NTCRA) Report for Operable Unit #10, Site 35 dated October 2008 at Camp Lejeune, MCB Superfund Site. The following comments are included for the Partnering Teams consideration.

### **General Comments**

As noted in the Executive Summary of the Report and in the body of the report, the Objectives of the NTCRA were not achieved since the 80% reduction of contaminants of concern (COCs) were not achieved and therefore the reduction in the potential for contaminant dispersion from "hot spots" to surrounding areas was not achieved. The causes attributing to the failure to achieve these objectives was described in the Observations and Conclusions, Section 7, of the report. Microbial sampling indicated that the appropriate dechlorinating bacteria were not present in the NTCRA area at levels to promote reductive dechlorination and the spacing of the injection points was too far apart.

It would be appropriate to meet the original 80% reduction in contaminant concentrations in the two "hot spot" areas in order to meet the remedial action objectives for the site prior to implementing Monitored Natural Attenuation (MNA) at Site 35. By achieving these objectives it will further reduce potential risk and reduce monitoring requirements (smaller plume) and the time it takes to achieve groundwater standards.

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

1646 Mail Service Center, Raleigh, North Carolina 27699-1646  
Phone: 919-508-8400 \ FAX: 919-715-4061 \ Internet: [www.enr.state.nc.us](http://www.enr.state.nc.us)

Mr. Gary Tysor  
11-24-2008  
Page 2 of 2

Sincerely,

A handwritten signature in black ink that reads "W.R. McElveen". The signature is written in a cursive style with a large, prominent initial "W".

Randy McElveen  
Environmental Engineer  
NC Superfund Section

Cc: Dave Lown, NC Superfund Section  
Bob Lowder, EMD/IR  
Gena Townsend, USEPA