

  
**NORTH CAROLINA DEPARTMENT OF  
ENVIRONMENT AND NATURAL RESOURCES**  
DIVISION OF WASTE MANAGEMENT

August 23, 1999



JAMES B. HUNT JR.  
GOVERNOR

WAYNE McDEVITT  
SECRETARY

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DIRECTOR

Commander, LANTNAVFACENGCOM  
Attention: Ms. Katherine Landman, Code 1823  
1510 Gilbert Street (Building N-26)  
Norfolk, Virginia 23511-2699

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

RE: NC Superfund Section Preliminary Comments  
Prefinal Record of Decision (ROD)  
Operable Unit No. 6, Sites 36, 43, 44, 54 & 86  
MCB Camp Lejeune

Dear Ms. Landman:

I have received and reviewed the Prefinal ROD for this site and offer the following general comments:

1. The ROD and proposed remedies do not address the following issues:

Site 36

- a) Lead in soils is above the EPA action level (400 ppm).
- b) Benzo(a)pyrene is in surface soils above the EPA Region III industrial RBC.
- c) Dieldrin in the surface soils is above the EPA Region III industrial RBC level by 2 orders of magnitude.

Site 43

- a) The levels of several PAHs in surface soils are above the EPA Region III industrial RBCs by 1 to 2 orders of magnitude.
- b) PAHs in subsurface soils are above the EPA Region III residential RBCs.

Ms. Landman  
8-23-99  
Page 2

Site 44

- a) Arsenic in surface soils is above the EPA Region III industrial RBC and above the residential level in subsurface soils.
- b) The surface aquifer is contaminated, presumably by Edwards Creek.

Site 86

- a) Benzo(a)pyrene in the surface soils is above the EPA Region III industrial RBC.
2. In addition to aquifer use controls, land use controls are part of the remedy and should be discussed in the text of the ROD.
3. The contamination in Edwards Creek requires immediate attention.

Specific comments are attached. The Superfund Section industrial hygienist, David Lilley, is examining the risk assessment issues and may have additional comments. We appreciate the opportunity to comment on this document. 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  
Dan Bonk, Baker Environmental  
Dianne Rossi, Wilmington Regional Office

North Carolina Superfund Section Comments  
OU06 (Sites 36, 43, 44, 54, & 83) Prefinal ROD  
MCB Camp Lejeune  
August 23, 1999

1. Page ix. References are made to "controls within the Base Master Plan." These should be changed to Land Use Control Assurance Plan (LUCAP) and/or Land Use Control Implementation Plan (LUCIP).
2. Page ix, Second, Fourth and Sixth bullet: A 1,000-foot buffer is proposed. In addition it should be noted that the installation of water supply wells that draw contaminated water from the plume, even if the wells are located outside the buffer, are prohibited by North Carolina regulations.
3. Page 1, Last Paragraph. Land use controls are being proposed in lieu of cleanup to residential standards. Land use controls are part the remedy and should be discussed in the ROD.
4. Sections 2.5, 4.5, 5.5, 6.5, Summary of Site Risks. The Section industrial hygienist is reviewing these sections. Comments will be submitted later.
5. Page 10. Section RAA3: Monitored Natural Attenuation. (And in other sections where monitored natural attenuation is proposed). Hydrogen is being proposed for analysis. Hydrogen was not part of previous natural attenuation studies; do you want to add it?
6. Page 17, Top of page. Text refers to "spiractor" grit material. Is this correct, or perhaps a typographical error?
7. Table 36-1. A note should be inserted indicating that the PCBs listed in the table were removed.