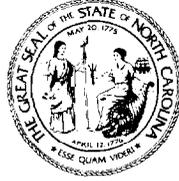


01.01-12/17/92-00858



State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor
William W. Cobey, Jr., Secretary

William L. Meyer
Director

December 17, 1992

Commander, Atlantic Division
Naval Facilities Engineering Command
Code 1822
Attn: MCB Camp Lejeune, RPM
Mr. Byron Brant, P.E.
Norfolk, Virginia 23511-6287

Commanding General
Attn: AC/S, Environmental Management
Building 1, Marine Corps Base
Camp Lejeune, NC 28592-5001

RE: Draft Site Inspection Report, Site 44
MCB Camp Lejeune, Jacksonville, NC
Onslow County

Dear Mr. Brant:

Please find enclosed comments for the referenced reports. If you have any questions please contact me at (919) 733-2801.

Very Truly Yours,

A handwritten signature in black ink that reads "E. Peter Burger". The signature is written in a cursive style with a large, sweeping "B" and "g".

E. Peter Burger
Environmental Engineer
Superfund Section

PB/dk/Site44.pb/1

MCB CAMP LEJEUNE
COMMENTS, SITE 44, JONES STREET DUMP
JACKSONVILLE, NC

General Comments

Page 1-1, 2nd paragraph. Is the date of the FFA the 13th or 14th of February, 1991? It was signed and dated by the NC DEHNR on 14 February, 1991. Technically, the 14th may be the legal date.

Page 1-1, 2nd paragraph. The purpose of the site investigation should be expanded to include those items listed in the Executive Summary, paragraph #2.

Page 1-4, Section 1.1.2. Please provide better description of the dump. Was the dump a landfill, a filled borrow pit, or filled low lands? This isn't clear to the reader.

Regarding Tables. Please provide table that shows NC and Federal MCL's for all compounds.

Regarding Section 5, Preliminary Risk Assessment. No contaminant concentrations have been promulgated by the state of North Carolina for sediment/soils or many compounds in surface and groundwaters. Levels for contaminants in media that have not been promulgated will be based on Risk Assessments. Concentrations of contaminants will be established based on Risk Assessments that produce a one in one million health risk. Additionally, concentrations will also be established that are protective of the surface and groundwaters. The Superfund Section advises those individuals who will be responsible for developing Risk Assessments to consult with the staff of the Superfund Section prior to work.

Regarding Soil Investigation. The Superfund Section supports the recommendation of additional test pitting to explore possibility of disposal of hazardous substances.

Specific Comments

Page 1-7 Figure 1-3. Please correct Ground Water Elevations as shown on Figure 1-3 (something is mixed up).

Page 1-9. Please provide justification for using PVC screen and riser in the SI report.

Page 1-10, Section 1.2.4, Decontamination Procedure. The procedure for decontamination did not follow protocol established in the Sampling and Analysis Plan, NUS, May 1991. The protocol established calls for specific cleaning methods, other than steam cleaning for equipment such as augers, rods, and split spoon samplers. The North Carolina Superfund

Section will not take exception to the variance from protocol based on the results of the soil sampling and the use of steam cleaning. We request, naturally, that protocol that is established be followed.

Page 2-1. The code referenced more specifically is Title 15A NCAC 2B.0200, Classifications and Water Quality Standards Applicable to Surface Waters of North Carolina.

Page 2-2. The Surface Water Classification at Site 44 is SC NSW. The NSW designation is to identify "nutrient sensitive waters".

Page 2-3. Please indicate that the known areas of shallow aquifer contamination is southeast of the site across the New River.

Page 2-4, 2nd Paragraph. The Castle Hayne Aquifer is described as confined in this instance. On page 2-5, as well as in other reports, the aquifer is described as semiconfined. I believe the intent is to describe the aquifer as semi confined, please correct.

Page 2-5, Section 2.1.8. Please provide a site map that shows the location of all the water supply wells with 1 mile proximity rings around site 44. Please indicate which wells are in use.

Page 2-5, Section 2.1.9. Please provide a Figure indicating limits of wetland/coastal ecosystems at site 44. (Approximation based on vegetation/obvious soil conditions will be suitable at this stage).

Page 2-8, Section 22.4 Groundwater. Please indicate groundwater classification at Site 44.

Page 6-2 Conclusions and Recommendations. The North Carolina Superfund Section agrees with the conclusions and recommendations. We suggest the additional information/data that you are proposing be conducted during the site investigation phase.