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State of North Carolina
Department of Environment, Health, and Natural Resources
512 North Salisbury Street • Raleigh, North Carolina 27604

James B. Hunt, Jr., Governor | Division of Solid Waste Management | Jonathan B. Howes, Secretary
Telephone (919) 733-4996

March 17, 1993

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

Commanding General
Attention: AC/S, Environmental Management
Building 1, Marine Corps Base
Camp Lejeune, North Carolina 28542-5001

RE: Draft Site Investigation, Site 65 - Engineer Area Dump
Jacksonville, Onslow County, North Carolina

Dear Mr. Brant:

The State of North Carolina has reviewed the referenced document along with comments prepared by the US EPA Region 4. The state has also enclosed our comments to the draft document.

The state concurs with the recommendation that additional work be conducted at the site. We look forward to the inclusion of our comments along with EPA's comments in planning the work. At the completion of the additional work, the document should be resubmitted with final recommendations for the disposition of the site. If you have any questions please contact me at (919) 733-2801.

Sincerely,

E. Peter Burger, P.E.
Environmental Engineer
NC Superfund Section

Enclosure

cc: Michelle Glenn, US EPA
Neil Paul, MCB Camp Lejeune

P.O. Box 27687, Raleigh, North Carolina 27611-7687 Telephone 919-733-4984 Fax # 919-733-0513

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Site 65
Engineer Area Dump
MCB Camp Lejeune, Jacksonville, Onslow County, NC
March 17, 1993

General Comments

Decontamination procedures must follow the US EPA SOPQAM. The methods described are based on NUS SOP May 1991.

The fact that Aroclor 1254 was found at a depth of 10-12 ft., and not at the surface, raises questions as to how it got there. Also of interest is that 4,4 DDD is found at a depth of 6-8 ft., and not at the surface, which is typical at this site. Review of the analytical results of the groundwater indicates a substantial increase (2 to 3 times) of inorganic concentrations from the upgradient monitoring well to the down gradient well. This seems to indicate a source of metals contamination within the site.

Based on these findings, it is very possible that some areas of contamination may be present, and additional soil and groundwater data should be collected along with additional background data to further characterize the site and the extent of contamination.

Base Line Risk Assessment must be completed for this site. The State of North Carolina requires that Dermal Exposure be included in the risk assessment as well as inhalation and ingestion. In addition, the state considers the additive effect of contaminants across all exposure routes, dermal, ingestion, and inhalation, as well as more conservative residential scenarios. We invite your Risk Assessment Personnel to contact the State of North Carolina Superfund Section to discuss these issues in more detail with our Section Toxicologist, Ms. Hanna Assefa.

Please include glossary of acronyms in the Draft SI. They are now included only in the "Data Validation Reports".

Specific

The State of North Carolina has reviewed EPA comments. In order not to be duplicative, we have not repeated any comments.

Page ES-5, 3rd paragraph. The State requests additional data be obtained and analysis be performed before a determination as to whether to proceed with an RI/FS.

Page 1-6, Figure 1-3. Please add approximate contours (10 ft. intervals) and locate debris piles and any other characteristic features.

Page 1-10, 5th paragraph. Please identify the disposition and handling of Site Generated Wastes.

Page 2-7, 3rd paragraph. Please provide NC Surface Water Classification.

Page 2-8, 3rd paragraph. Please provide approximate distance to these buildings and direction.

Page 2-7, 2nd paragraph. Site Topography is described as relatively flat. Preliminary information suggests the site slopes significantly to the south, as observed by ground surface elevations at monitoring wells. Please clarify.

Page 4-7, 1st paragraph. Add Iron (26,800-129,000 ug/l).

Page 5-8, Table 5-2. Please note that Dermal Exposure is to be included in the Base Line Risk Assessment.

Page 5-17, Table 5-4. Please correct the following: 1.) Beryllium, Federal MCL is 0.001 not .004 mg/l; 2.) Iron, state standard is 0.3 not .03 mg/l.

Page 6-1, Section 6.2. Recommendations.
The State recommends that additional on-site and background data (soils and groundwater) be collected in order to further characterize the site. Following this work a Base Line Risk Assessment should be performed utilizing conservative residential scenarios and exposure factors acceptable to the State of North Carolina.