

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

July 13, 1999

Commander, LANTNAVFACENGCOM  
Attention: Ms. Maritza Montegross, 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 Comments  
Draft No Further Response Action Plans and Risk Assessments for  
Site 87 and Site 75  
MCB Camp Lejeune

Dear Ms. Montegross:

We reviewed of these documents and submit the following comments:

1. Site 87: Pentachlorophenol was detected in groundwater at levels greater than the NC groundwater standards and thallium was found above the federal MCL. This information should be tracked using the Base GIS system or some other method. If source areas or higher groundwater levels are discovered, further evaluation will be necessary.

Attached are additional comments on the risk assessment.

2. Site 75: Attached are comments on the risk assessment

We appreciate the opportunity to review this document. Please call me at (919) 733-2801, extension 278 if you have any questions.

Sincerely,



David J. Lowh, LG, PE  
Geological Engineer  
Superfund Section

cc: Gena Townsend, US EPA Region IV  
Neal Paul, MCB Camp Lejeune  
Dan Bonk, Baker Environmental

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



June 1, 1999

JAMES B. HUNT JR.  
GOVERNOR

TO: David Lown

FROM: David Lilley

DBL

WAYNE MCDEVITT  
SECRETARY

RE: Comments prepared on the Draft No Further Response Action  
Plan Decision Document, Site 87, MCB Camp Lejeune, NC.  
April 17, 1998

WILLIAM L. MEYER  
DIRECTOR

After reviewing the above mentioned document, I offer the following  
comments:

1. Page 1-4, Section 1.2.1.2, sixth paragraph: Part of the reason no VOCs, pesticides, or PCBs were detected may have been the detection limits. At the detection limits listed in Appendix I of the Final Pre-Remedial Investigation Screen Study, about 60% of the VOCs, 50% of the Pesticides/PCBs, and 33% of the SVOCs would not be detected. These wells must be resampled and detection limits consistent with the scope of work of this report must be achieved.
2. Page 3-1, last paragraph: The screening levels contained within the NC Risk Analysis Framework (RAF) document are **DRAFT** numbers and **NOT** to be used or cited in Risk Assessment or cleanup level determinations. The use of the **METHODOLOGIES** contained within the RAF is acceptable.

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NORTH CAROLINA DEPARTMENT OF  
ENVIRONMENT AND NATURAL RESOURCES



June 1, 1999

JAMES B. HUNT JR.  
GOVERNOR

WAYNE MCDEVITT  
SECRETARY

TO: David Lown  
FROM: David Lilley *DBL*  
RE: Comments prepared on the Baseline Risk Assessment  
Contained within the Pre-Remedial Investigation Screening  
Study, Sites 12, 68, 75, 76, 84, 85, and 87, MCB Camp  
Lejeune, NC.

**NOTE:** The only portion of this document reviewed was  
the Site 87 BRA.

After reviewing the above mentioned document, I offer the following  
comments:

1. Page 5-20 and Table 5-25 contain contradictory information. In the last two paragraphs of page 5-20, it is stated that the five PAHs that did not exceed their screening values were not retained as COPCs. Table 5-25 states that the five cPAHs that did not exceed their screening values were retained as COPCs. The risk calculation tables in Appendix L include the cPAHs as COPCs. Please correct page 5-20 to show the cPAHs will be kept as COPCs.
2. Page 5-21, second paragraph, third sentence: Delete beryllium.
3. The detection limits for VOCs, SVOCs, and Pesticides/PCBs in groundwater are not acceptable. At the detection limits listed in Appendix I, about 60% of the VOCs, 50% of the Pesticides/PCBs, and 33% of the SVOCs would not be detected at the screening levels. These wells must be resampled and detection limits consistent with the scope of work of this report must be achieved.
4. Page 5-27, second paragraph: It is stated that the 95% UCL for the lognormal distribution was used as the exposure point concentrations for groundwater. According to the Supplemental Guidance to RAGS, Region 4 Bulletins, Bulletin 3, page 3-3, the groundwater exposure point concentrations should be the arithmetic average of the wells in the highly

concentrated area of the plume. Please change the appropriate sections of this report to be consistent with this guidance.

5. Table 5-29 and page 5-22: The only sample for thallium that was not rejected showed levels above the MCL, therefore, thallium should be retained as a COPC.

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May 24, 1999

JAMES B. HUNT JR.  
GOVERNOR

TO: David Lown

FROM: David Lilley

*DBL*

WAYNE MCDEVITT  
SECRETARY

RE: Comments prepared on the Baseline Risk Assessment  
Contained within the Pre-Remedial Investigation Screening  
Study, Sites 12, 68, 75, 76, 84, 85, and 87, MCB Camp  
Lejeune, NC.

WILLIAM L. MEYER  
DIRECTOR

**NOTE:** The only portion of this document reviewed was  
the Site 75 BRA.

After reviewing the above mentioned document, I offer the following  
comments:

1. Page 5-15, Subsurface Soil, last paragraph: Beryllium was not detected at concentrations exceeding the residential RBC Value as claimed and should be deleted from the list of COPCs.
2. Page 5-16 and Table 5-13: Aluminum exceeded the MCL once, and iron and manganese exceeded the NCWQS once, therefore, these contaminants should be retained as COPCs.
3. The detection limits for VOCs and SVOCs in groundwater is not acceptable. At the detection levels listed in Appendix I, about 60% of the VOCs and 33% of SVOCs would not be detected at screening levels. These wells must be resampled and detection limits consistent with the scope of work of this report (usually around 1 ug/l) must be achieved.
4. Page 5-43, section 5.5.3.2: The risk values are presented in Table 5-43, not 5-42 as stated. Please correct.

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

May 24, 1999



JAMES B. HUNT JR.  
GOVERNOR

WAYNE MCDEVITT  
SECRETARY

WILLIAM L. MEYER  
DIRECTOR

TO: David Lown

FROM: David Lilley *DBL*

RE: Comments prepared on the Draft No Further Response Action  
Plan Decision Document, Site 75, MCB Camp Lejeune, NC.  
April 17, 1998

After reviewing the above mentioned document, I offer the following comment:

1. Page 1-4, Section 1.2.1.2, end of second paragraph: It is claimed groundwater samples were analyzed for tear gas compounds which were expected at the site. There is no mention of this in the Baseline Risk Assessment contained within the Pre-Remedial Investigation Screening Study, and no sample results for tear gas compounds in Appendix I of the mentioned document. Please submit the sample results of the tear gas compounds for review.
2. Page 3-1, last paragraph: The screening levels contained within the NC Risk Analysis Framework (RAF) document are **DRAFT** numbers and **NOT** to be used or cited in Risk Assessments or cleanup level determinations. The use of the **METHODOLOGIES** contained within the RAF is acceptable.
3. Page 4-1: The detection limits for VOCs and SVOCs (groundwater) in the BRA contained within the Pre-Remedial Investigation Screening Study are not acceptable. At the detection limits listed in Appendix I, about 60% of the VOCs and 33% of the SVOCs would not be detected at the screening levels. These wells must be resampled and detection limits consistent with the scope of work of this report (usually around 1 ug/l) must be achieved.

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