

03.01-3/21/02-2965

North Carolina
Department of Environment and Natural
Resources



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

March 21, 2002

Commander, Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street (Building N-26)
Norfolk, Virginia 23511-2699

Attention: Mr. Kirk Stevens
Navy Technical Representative
Code EV23

RE: NC Comments Site 84
Draft RI and FS Reports
MCB Camp Lejeune

Dear Mr. Stevens:

The North Carolina Superfund Section has reviewed this document and our comments are attached. If you have any questions, please call.

Sincerely,

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

Attachments

cc: Gena Townsend, USEPA
Rick Raines, MCB Camp Lejeune

NC Superfund Comments
Draft Remedial Investigation
OU19, Site 84
March 21, 2002

1. The groundwater at this site contains contaminants at levels greater than the State groundwater standards (15A NCAC 2L). The groundwater contamination must be addressed before the cleanup is complete.
2. **Section 4.4 State and Federal Criteria and Standards.** The NC Hazardous Waste Section Soil Screening Levels (SSLs) for protection of groundwater should be included in this discussion of screening levels. The contaminants in soils should be screened against SSLs when they are present in groundwater above the State standards.
3. **Section 8.2. Recommendations.** While the non-TCRA action may remove contaminants other than PCBs, the non-TCRA action does not formally address these compounds. An objective of the non-TCRA removal is to identify and remove PCB contaminated soils surrounding Building 45. The other contaminants identified in the soils must be addressed before the cleanup is complete.
4. David Lilley is reviewing the Risk Assessments and will submit comments later.
5. Comments from the Wilmington Regional Office are attached.

NC Superfund Comments
Draft Feasibility Study
OU19, Site 84
March 21, 2002

1. The groundwater contains contaminants above the NC groundwater standards. Groundwater contamination must be addressed before the cleanup is complete.
2. The soil contains arsenic levels above the Region IX PRG and the base background levels. How will the arsenic be managed?
3. Tables 1 through 3 list potential state ARARs for this cleanup.

TABLE 1
NORTH CAROLINA POTENTIAL CHEMICAL-SPECIFIC ARARS, CRITERIA,
AND GUIDANCE

Potential State ARAR	Citation	Comment
Oil Pollution and Hazardous Substances Control Act	NCGS 143-215.75 et seq.	Protects the land and waters of NC from pollution
NC Water Quality Standards and Surface Water Effluent Limitations	15A NCAC 2B	Establishes a series of classifications and water quality standards for surface waters and limits effluent discharged to surface water.
NC Groundwater Standards	15A NCAC 2L	Establishes allowable levels of organic and inorganic compounds in groundwater
NC Air Pollution Control Regulations	15A NCAC 2D, 2H, 2Q	Regulates ambient air quality and establishes air quality standards for hazardous air pollutants.
NC Hazardous Waste Management Rules	15A NCAC 13A .0009 & .0012	Establishes standards for hazardous waste that is excavated and stored or treated as part of Remedial Action.

**TABLE 2
 NORTH CAROLINA POTENTIAL LOCATION-SPECIFIC ARARS, CRITERIA,
 AND GUIDANCE**

Potential State ARAR	Citation	Comment
NC Hazardous Waste Management Rules	15A NCAC 13A	Location requirements and land disposal restrictions for hazardous waste excavated, stored, and/or treated onsite.
NC Solid Waste Management Rules	15A NCAC 13B .1600	Siting requirements for solid waste landfill facilities
NC Recordation of Inactive Hazardous Substance or Waste Disposal Sites	NCGS 130A-310.8	State requirement for recordation of inactive hazardous waste sites
NC Coastal Management	15A NCAC 7H	Guidelines for areas of environmental concern.

**TABLE 3
 NORTH CAROLINA POTENTIAL ACTION-SPECIFIC ARARS, CRITERIA,
 AND GUIDANCE**

Potential State ARAR	Citation	Comment
NC Groundwater Corrective Action	15A NCAC 2L .0106	Regulations for cleanup of contaminated groundwater.
NC Well Construction Standards	15A NCAC 2C .0100	Construction and abandonment requirements for water wells.
NC Injection Well Construction Standards	15A NCAC 2C .0200	Construction requirements for injection wells.
NC Water Quality Discharge Requirements	15A NCAC 2H .0100 & .0200	Waste water requirements for discharges and infiltration galleries.
NC Sedimentation Control Rules	15A NCAC 4B	Requirements for storm water management and erosion control
NC Hazardous Waste Management Rules	15A NCAC 13A	Design and treatment requirements for hazardous waste
NC Solid Waste Management Rules	15A NCAC 13B	Design and monitoring requirements for solid waste disposal sites
NC Air Pollution Control Requirements	15A NCAC 2D, 2H .0600, 2Q	Regulates air quality and establishes emissions standards.

DIVISION OF WATER QUALITY

Groundwater Section

March 15, 2002

MEMORANDUM

TO: David Lown
Division of Waste Management

FROM: Diane Rossi

THROUGH: Charles Stehman

SUBJECT: Draft Remedial Investigation
and
Draft Feasibility Study
Operable Unit No. 19, Site 84 -Building 45
Marine Corps Base-Camp Lejeune
Onslow County

Draft Remedial Investigation comments:

1. Most of the compounds observed in soils at the site have not impacted groundwater to the extent that they have caused groundwater violations. Existing groundwater contamination at the site seems to be related to fuel releases which are to be addressed by an existing remedial system. The small quantity of pesticides and lack of PCBs in groundwater is to be expected due to low solubility of these compounds. The low level of pesticides observed at many of the sample locations throughout the site are characteristics of what would be expected from pesticide applications at those locations in the past. The available information does not indicate a need for additional groundwater remediation beyond that which is currently operative at the site.
2. The Groundwater Section is not aware of the current TSCA requirements for PCB clean-up in soils, but groundwater data suggests the archlor has not impacted groundwater. If guidance is needed, it is suggested that the EPA Region 3 Risk Base Framework, which was developed into a draft document for the Groundwater Section in 1996, but not yet adopted, may be applied.

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3. There may be some concern of vertical delineation of groundwater at the site, however, information available concerning 1992 well nests may be sufficient to determine the vertical extent of contamination.

Draft Feasibility Study comments:

1. The Groundwater Section has no comment on the remedial strategies proposed, however, the Groundwater Section is in favor of a long term monitoring program.

cc: WiRO-GWS
Kirk Stevens (EFDLANT)

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