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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
SAM NUNN ATLANTA FEDERAL CENTER  
61 FORSYTH STREET, S.W.  
ATLANTA, GEORGIA 30303

April 4, 2002

4WD-FFB

Mr. Kirk Stevens  
Department of the Navy - Atlantic Division  
Naval Facilities Engineering Command  
Code 1823  
Norfolk, Virginia 23511-6287

SUBJ: MCB Camp Lejeune  
Draft Feasibility Study  
Operable Unit No.19, Site 84/Building 45

Dear Mr. Stevens:

The Environmental Protection Agency (EPA) has completed its review of the above subject document. Comments are enclosed. The majority of these comments, omission of the groundwater media, were discussed in our March 28<sup>th</sup> conference call.

If there are any questions, I can be reached at (404) 562-8538.

Sincerely,

A handwritten signature in black ink, appearing to read "Gena D. Townsend".

Gena D. Townsend  
Senior Project Manager

Enclosure

cc: Dave Lown, NCDEHNR  
Rick Raines, MCB Camp Lejeune

**Comments on the Draft Feasibility Study  
Operable Unit No. 19, Site No. 84 - Building 45 Area  
Marine Corps Base, Camp Lejeune, North Carolina  
Dated January 2002**

## GENERAL COMMENTS

1. The Remedial Investigation (RI) report identified several compounds in groundwater that exceeded North Carolina Water Quality Standards and/or were found to pose unacceptable risk to future groundwater users. Granted, this particular piece of property has no identifiable near term or long-term users of groundwater as a source of drinking water. However, as part of the CERCLA process, unrestricted access to all site media, including groundwater, must be considered during the FS. Simply saying that there is low likelihood of exposure and therefore groundwater media will not be evaluated is not acceptable. This report should be revised to include an evaluation of the remedial action objectives for groundwater and an array of response actions to be considered. The decision for the remedial action objective for a given medium should only be made after a thorough evaluation in the FS.
2. Large sections of the RI report dealing with risk assessment scenarios were transcribed nearly verbatim and included in Section 1.0 of the FS. As there were a number of comments generated for these sections of the RI, the sections may be revised during the comment resolution period. Please revise the appropriate sections of the FS to reflect the agreed upon changes in the RI.
3. Section 5 does a good job in evaluating potential remedial actions for contaminated soil and sediment. Additionally, at numerous points in the FS, the text states that the potential use of shallow groundwater is low and therefore should not be considered as a medium of concern. In the detailed Individual Analysis of Alternatives all seven Remedial Action Alternatives (RAA) mention the risk associated with the contaminated shallow aquifer or how this RAA provides additional protection from the contaminated aquifer. It is most curious that an FS that does not consider groundwater a medium of concern goes to such great lengths to point out how all the RAAs protect populations from the contaminated surficial aquifer. Please see General Comment 1.

## SPECIFIC COMMENTS

1. Page 2-3, Section 2.3, First Paragraph. While there may be no planned use for the groundwater in this area, compounds are present that do present an unacceptable risk. Therefore, groundwater should be addressed in the Feasibility Study as one of the Media of Concern. The contaminants that exceeded the North Carolina Water Quality Standards and/or were found to have unacceptable risk to future groundwater users should be evaluated as Contaminants of Concern.

2. Page 2-11, Section 2.6. This section deals with Areas of Concern. As the groundwater medium is added to this FS, please revise this section to include groundwater areas of concern.
3. Page 2-12, Section 2.7. This paragraph states that the "specific media(s) to be address is (are) contaminated soil ... and sediment". The third bullet of this section lists one of the remedial action objectives as "Protect human health by mitigating the potential for exposure to the contaminated surficial aquifer". Please revise the beginning of this section to include groundwater as one of the specific media to be addressed.
4. Page 4-3, Section 4.1.1. This section about the No Action alternative says that the site's contaminants are expected to attenuate over time through various processes. The site is contaminated with PCBs and benzo-a-pyrene. These compounds are known for their environmental persistence, not their tendency to attenuate. Please revise this section to the approximate time frame that this attenuation might be expected to occur.
5. Page 5-1, Section 5.0. The last paragraph on this page appears to have left the USEPA out of the future review process. Please revise the text to include full USEPA involvement in this review process.
6. Tables 5-1 and -2. It is unclear why these RAAs, which are simple excavations and refilling of the excavation, require approximately 300 more cubic yards of soil to fill the excavations than was taken out of the excavation. Please provide an explanation or revise the tables.
7. Tables 5-3 and -4. It is unclear why soil washing, which in theory is supposed to reduce the amount of material required for special disposal, is estimated to require more than seven times the amount of special off-site PCB disposal than simple excavation. Again, the amount of material required to fill the excavation exceeds the amount removed. Please provide an explanation or revise the tables.