



## MEMORANDUM

**TO:** Marine Corp Base Camp Lejeune IR Partnering Team      **DATE:** October 31, 2007

**FROM:** Marcella J. Gallick

**RE:**      **RESPONSES TO COMMENTS**  
**DRAFT FINAL PROJECT CLOSEOUT REPORT**  
**OPERABLE UNIT 19 SITE 84**  
**MCB CAMP LEJEUNE, NORTH CAROLINA**

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Responses to comments received on the *Draft Final Project Closeout Report, Review, Recommendations, and Removal Action, Site 84 Operable Unit 19, MCB Camp Lejeune, North Carolina* (Rhēa, May 2007) are provided below:

Comments were received from Ms. Gena Townsend (United States Environmental Protection Agency [USEPA] Region 4) and from Mr. Randy McElveen (North Carolina Department of Environment and Natural Resources [NCDENR]).

**USEPA Comment 1:** Revise the sentence on the bottom of page vii that begins with “Because the entire Site 84. . .”

**Response:** The sentence has been revised and now reads: “Because Site 84 has not been remediated to the soil action level of 10 ppm, a 2-foot thick vegetative soil cover was placed above the PCB-contaminated soil, and intrusive activity controls will be required.”

**USEPA Comment 2:** Delete the “Preferred Alternative and Land Use Controls” section from the Executive Summary.

**Response:** This section has been deleted.

**USEPA Comment 3:** Delete the final sentence at the end of Section 1.6 Selected Removal Method.

**Response:** This sentence has been removed.

**USEPA Comment 4:** Remove Section 4.0 Preferred Alternative and Land Use Controls from the report.

**Response:** Section 4.0 and Figure 5 Land Use Controls have been removed from the report.

**USEPA Comment 5:** Delete the second sentence from the first paragraph of Section 5.0 Summary of Project Costs.

**Response:** This sentence has been deleted.

**NCDENR Comment 1:** Following is a recommended sentence to follow the first sentence of the second paragraph on page ix. "About a third to one half of the excavation area of the site had PCB concentrations greater than 10 ppm after excavation was complete. However, . ." If this is not the best place to include this statement, please include a paragraph or reference Figure 3 or a calculation page that includes some surface area estimates of PCB areas that exceed 10 ppm at depths of 2 feet or greater. Please include the number of samples that these estimates are based on. Most of Site 84 is cleaned up to below the industrial cleanup goal (<10 ppm). Let's not confuse that issue at the beginning of the document. Another option would be to reference the Figure 5 map of the excavation that show the estimated areas with PCBs that exceed 10 ppm and Figure 3 for the smaller area that exceeds the 50 ppm concentration range. It would be clearer if we color coded these on one Figure.

**Response:** The area with PCB concentrations greater than 10 ppm was calculated, and a version of your sentence above has been added at the end of the second paragraph on page ix. This sentence reads as follows: "In summary, based on 300 laboratory soil analyses, approximately one-third of Site 84 had PCB concentrations greater than 10 ppm at a depth greater than two feet at the completion of excavation and backfilling."

**NCDENR Comment 2:** The last paragraph at the bottom of page four is misleading. The phase III remedial action only removed soil that was greater than 10 and less than 25. This was stated several times throughout the report. Please change this remediation goal to >10ppm and < 25 as stated in the paragraph above. The actual field work was completed with this goal in mind not 10 ppm.

**Response:** The goal for the Phase III Removal Action was not to remove soil "greater than 10 and less than 25." You say that this goal was stated several times throughout the report. No reference to such a statement was found. No change was made to the report.

**NCDENR Comment 3:** See Section 1.5.1 on page five. I don't recall that the second steel pipe was related to the suspected second settling pond or lagoon. As I recall, after a detailed search, no one ever located another lagoon and the area where the second lagoon was suspected had sediment samples taken from them and none of the sediment samples taken from this area were above 10 ppm. Should we also document this sediment evaluation during Phase II?

**Response:** All references to a second lagoon have been removed from the report. Also, this report is documenting the Phase III NTCRA, so the sediment evaluation conducted during Phase II would not be included in this report.

**NCDENR Comment 4:** The last sentence of the first paragraph on page seven should use the word "too" rather than 'to'.

**Response:** "To" in this context does not mean also. The sentence has been revised to the following: "Thus, an EE/CA is similar to, but more streamlined than, an RI/FS conducted for remedial actions."

**NCDENR Comment 5:** I have some concerns about the IP10 data results (78 ppm PCBs) as shown on Figure 3 and the table in Appendix E. This is a high concentration taken, I expect at the 2 foot depth in the most down gradient area of the side. There are no Side-Wall samples in this excavation and we have not clean sample results below (downgradient) of this sample location. If the Phase I or Phase II analytical results provide any clean sample(s) downgradient (west) of soil sample location IP10 please make a note on Figure 3 and on the table in the report as well as for the Duplicate sample in appendix E. If not we may wish to take an additional sample in this area or clarify why this sample was not needed. A future reviewer may bring this back up.

**Response:** Two samples with concentrations less than 10 ppm were taken west (downgradient) of IP10 during the December 2005 sampling as documented in the Recommendations Report dated September 2006. A note has been added to Table 3-1, Figure 3, and Appendix E.