

Division of Waste Management

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



October 13, 2006

NAVFAC Atlantic
Attn: Daniel R. Hood
Code: OPCEV
NC/Caribbean IPT, EV Business Line
6506 Hampton Blvd
Norfolk, VA 23508-1273

RE: Comments on the Draft Treatability Study Work Plan
Operable Unit (OU) # 16, Site 89 MCB Camp Lejeune, NC
Soil and Groundwater
Camp Lejeune, NC6170022580
Jacksonville, Onslow County, North Carolina

Dear Mr. Hood:

The NC Superfund Section has received and reviewed the OU #16 (Site 86) Draft Treatability Study (TS) Work Plan, dated October 2006, for the Camp Lejeune, MCB Superfund Site located in Jacksonville, NC. The following comments are offered for the Partnering Teams consideration. The Wilmington Regional Office Water Quality Division has no comments on the Draft TS Work Plan. If you have any questions or comments please contact me at (919) 508 8467.

General Comment

With the exception of the minor comments listed below the Draft Treatability Study Work Plan is in good order and appropriate for the work to be performed. The various subcontractors Health and Safety Plans, as noted in Section 5 of this Work Plan, should be thoroughly reviewed by all site workers and visitors prior to implementation of work. If the proposed work schedule as provided in Figure 9-1 changes please notify the Partnering team and especially the State and the MCB representatives in regard to all field activities since regulatory overview of field work is primarily the States and the MCBs responsibility.

Specific Comments

1. The bottom of page 4-7 and the top of page 4-8 discusses the proportions of mulch and aggregate that will be mixed in the hopper of the trenching machine. Quality control of this process sounds critical for assuring an even distribution of the mulch within the gravel. The more even the distribution, the more effective the remedy will be.

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Mr. Daniel Hood

10-13-2006

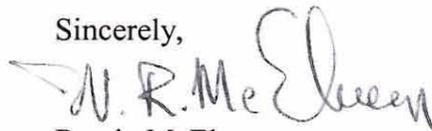
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2. The Baseline and Post-Implementation Groundwater Monitoring paragraphs on page 4-8 are not clear on how many sampling events will be completed. It sounds like four total for the PRB remedy. If this is the case, a baseline and 3 post-implementation sampling events, please clarify by starting the Post-Implementation paragraph with a statement such as: "Following the baseline monitoring event three groundwater monitoring events will be conducted etc . . ."

3. Section 4.6.3 on Page 4-14 discusses the waste characterization process for soil that will be excavated from the PRB trench area. Since this area is known to contain high concentrations of chlorinated solvent, we need to take care that we obtain a representative sample of the material taken from the trench so we don't include soil that contains hazardous levels of CVOCs. If strong odors are noted during excavation it may be best just to dispose of these soils as hazardous waste.

If you have any questions or comments, please contact me, at (919) 508 8467 or email to randy.mcelveen@ncmail.net

Sincerely,

A handwritten signature in black ink that reads "Randy McElveen". The signature is written in a cursive style with a large, stylized "M" and "E".

Randy McElveen
Environmental Engineer
NC Superfund Section

Cc: Dave Lown, NC Superfund Section
Bob Lowder, EMD/IR
Gena Townsend, USEPA