

North Carolina  
Department of Environment and Natural Resources

Division of Waste Management

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



April 7, 2008

Attn: Gary Tysor  
NAVFAC Midlant Environmental RPM, Camp Lejeune  
Marine Corps North Carolina IPT  
6506 Hampton Blvd  
Norfolk, VA 23508-1273

RE: Comments on the Draft NTCRA Work Plan for Operable Unit # 16, Site 89,  
MCB Camp Lejeune, NC  
NC6170022580  
Jacksonville, Onslow County, North Carolina

Dear Mr. Tysor:

The NC Superfund Section has received and reviewed the Draft Non-Time Critical Removal Action (NTCRA) Work Plan for Operable Unit # 16, Site 89, dated March 2008, at Camp Lejeune, MCB Superfund Site. The following comments are included for the Partnering Teams consideration.

### Specific Comments

1. Bullets 3 and 5 on page 4-1 discuss containment berms, water management and high visibility fencing which are critical aspects of this work. The berms and water management go hand in hand and must be properly designed and constructed. The berm for the phase III area is not properly designed. The sides of the berm must extend to the same surface elevation as the berm height or completely encircle the proposed treatment area. Otherwise material may flow out or into the mixing area. As previously discussed, major water management issues could occur as a result of breaking down the soil structure and due to the proximity of the adjacent Edwards Creek and shallow groundwater.

It is recommended that emergency water containment be located near the site for quick mobilization if needed due to inclement/extreme weather conditions or other issues arise due to the shallow groundwater in this area. Synthetic liner should also be available on site to minimize berm erosion in the event heavy rainfall raises the creek level to the berm elevations.

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Mr. Gary Tysor

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The high visibility fencing and the existing chain link fence are essential for protection of children, who live nearby the site, from site access. It is recommended that a note be provided with the high visibility fence-bullet; stating that the existing chain link fence will be maintained, for security, during the work.

2. Contaminated soil waste as discussed in the EPAs comment #4 may be treated on site using the ZVI Soil Mixing process.
3. Section 4.3.3 on page 4-3 states that the overburden excavation areas will **not** be shored or sloped. In this case workers will not be allowed in the excavation areas or it would be an OSHA safety violation. This is especially important near the down-gradient perimeter where additional surcharge from bermed soil will be placed. This issue should be discussed with all site workers during the daily safety briefings.

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

Sincerely,



Randy McElveen  
Environmental Engineer  
NC Superfund Section

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