

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



March 31, 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 Record of Decision
Operable Unit (OU) # 16, Site 93 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 93) Draft Record of Decision (ROD), dated March 2006, for the Camp Lejeune, MCB Superfund Site located in Jacksonville, NC. The following comments are offered for the Partnering Teams consideration. If you have any questions or comments please contact me at (919) 508 8467.

General Comment

The language describing the selected remedy is a little too specific for a ROD. Many of the design details are given in Section 1.12.2. If we are too restrictive in the ROD we may need a ROD amendment or an Explanation of Significant Difference (ESD) to implement changes we determine appropriate in the remedial design (RD).

Specific Comments

1. Please remove the word "within" and replace it with the word "every" before the words "five years" at the bottom of page 1-2." Here and throughout report.
2. Discussing a previously written Feasibility Study (FS) and its remedies in Section 2.2.4 on page 2-3 is unnecessary and can create confusion. We could state that a previous FS was started but not completed due to the review of the Record of Decision language by the DOD and the EPA and work schedules.

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Mr. Daniel Hood

3-31-2006

Page 2 of 3

3. The first sentence of Section 2.9.4 on page 2-14 states that “MNA of untreated areas downgradient” is a part of the remedy. The upgradient areas around buildings G920 and G930 that exceed the NCAC 2L Groundwater Standards also require monitoring. Please make appropriate language changes throughout the text of the report and in Table 2-8.
4. Section 2.9.4 at the bottom of page 2-14 describes Alternative 4. It is recommended that we not include design details of the treatment remedy in the ROD. If we do include these details we should state that they are preliminary and will be determined more specifically in the Remedial Design. As I stated above, if we are too restrictive in the ROD we may need a ROD amendment or an Explanation of Significant Difference (ESD) to implement changes we determine appropriate in the remedial design (RD). Make similar changes in Section 1.12.2 also.
5. Please insert “and MNA” after “LUC component” in the first sentence and after “LUCs” in the second sentence of Section 2.10.1.1 on page 2-17. MNA is the control that assures the plume does not expand and thus also protects human health and the environment.
6. Please insert the word “maximum” before the words “extent practicable” in the partial sentence at the top of page 2-20.
7. The NCGWQS for 4 of the primary COCs are listed at the middle of page 2-21. The NCAC 2L Interim Standard for 1,1,2,2 PCA, another primary COC at site 93, is 0.17 ug/l and should be included in this list.
8. Please insert the words “along with the MNA remedy” after “LUCs” in Section 2.13.6 on page 2-23. Please replace the words “within 5 years” to “every 5 years” in the same paragraph.
9. Please define the abbreviation LS in Table 2-10.
10. The following Citation for the Construction of Injection Wells on the last page of Table B-6 of Appendix B should be 15A NCAC 2C .0200. Please make appropriate changes.
11. In the Chemical Specific ARARs list in Table B-2 of Appendix B, please include the 15A NCAC 2B .0100, 0200 & 0400. These promulgated standards establish a series of classifications and water quality standards for surface water. The 2B standards could be applicable during the remedial action if the permanganate affects the adjacent Edwards Creek or in the future if we need to discharge treated water to the creek.
12. In the Action Specific ARARs list in Table B-4 and B-6 of Appendix B, please include the 15A NCAC 13B standards. These rules govern the management of solid waste. Including storage, collection, transportation, and disposal of solid waste. Site remedial action may include off-site residual disposal that must comply with solid waste management rules.

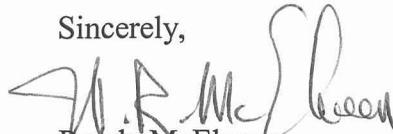
Mr. Daniel Hood

3-31-2006

Page 3 of 3

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, appearing to read "Randy McElveen". The signature is stylized with a large, looped initial "R" and a cursive "McElveen".

Randy McElveen
Environmental Engineer
NC Superfund Section

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