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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

March 2, 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4WD-FFB

Ms. Linda Berry
Department of the Navy - Atlantic Division
Naval Facilities Engineering Command
Code 1823
Norfolk, Virginia 23511-6287

SUBJ: MCB Camp Lejeune - OUI
Draft Feasibility Study
Sites 21, 24 & 78

Dear Ms. Berry:

The Environmental Protection Agency (EPA) has partially completed its review of the above listed document. Comments are enclosed. EPA's comments on the human health aspects will be forwarded at a later date.

If there are any questions or comments, please call me at (404) 347-3016.

Sincerely,


Gena D. Townsend
Senior Project Manager

Enclosure

cc: Mr. Neal Paul, MCB Camp Lejeune
Mr. Patrick Watters, NCDEHNR

1.0 GENERAL COMMENTS

The following general comments were developed from review of the Draft FS Report.

1. The Draft FS Report does not adequately incorporate or evaluate historical analytical data for water supply wells HP-601 and HP-603 presented in the Draft Remedial Investigation (RI) Report dated January 1994. The Draft RI Report states that HP-601 is an inactive well and HP-603 is the active well; whereas the Draft FS Report states the opposite. The status of water supply wells HP-601 and HP-603 needs to be clarified in the Draft FS Report.

The Draft FS Report is also deficient because it relies on an incomplete evaluation of the water supply wells presented in the earlier Draft RI Report. The groundwater sampling investigations were not consistent in monitoring contamination at any of the northwestern water supply wells during the period from 1984 to 1992 (e.g., the only water supply well sampled in 1992 was HP-603). Complete evaluation should be conducted to determine whether additional groundwater sampling should be performed at both the active and the inactive water supply wells along the northwestern boundary of OU No. 1 and, based on the analytical results, to determine if this area should be included as an area of concern. If the water supply wells had drawn the contaminant plume from OU No. 1 to the northwest and into deeper sections of the aquifer, this information needs to be assessed in both the Draft RI Report and the Draft FS Report.

According to the historical analytical results in Table 3-13 in the Draft RI Report, the water supply wells along the northwestern boundary of OU No. 1 should not be utilized due to the high concentrations of halogenated organic compounds exceeding the maximum contaminant level. Halogenated organic compounds dichloroethene, trichloroethene and tetrachloroethene were detected in these wells during the 1984, 1985 and 1992 sample investigations.

2. If either water supply well HP-601 or HP-603 was active, the Draft FS Report needs to evaluate the effects the capture zone from the active water supply well may have on the groundwater extraction system. The influence of the capture zone should be evaluated before the design phase for OU No. 1 since it may affect the groundwater extraction system proposed as a remedial action alternative (RAA) in the Draft FS Report.
3. The summary of soil technologies and process options shows

solidification/stabilization was eliminated as an RAA during the evaluation process. However, solidification/stabilization of soils contaminated with organic compounds has been successful and is currently used widely as a remediation alternative. Compared with the other RAAs such as offsite disposal and incineration presented in the Draft FS Report, solidification/stabilization may be a more cost-effective option.

4. Due to the industrialized nature of OU #1 there should be minimal impact to biota at the sites under the proposed remediation plans.
5. Page 5-27, Cost, last sentence
\$800,000 million should read \$800,000 thousands