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CERTIFIED MAIL RETURN RECEIPT REQUESTED

MAY 12 1994
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North Carolina Department of Environment,
Health, and Natural Resources
Attn: Mr. Patrick Watters
P.O. Box 27687
401 Oberlin Road
Raleigh, North Carolina 27611

Re: Draft Record of Decision (ROD) for Operable Unit No. 5
(Site 2), MCB Camp Lejeune, North Carolina

Dear Mr. Watters:

Attached please find responses to NCDEHNR comments on the above
referenced document dated February 2, 1994. Any questions
concerning these responses should be directed to Ms. Linda Berry
at (804) 322-4793.

Sincerely,

L. A. BOUCHER, P.E.
Head
Installation Restoration Section
(South)
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

Attachment

Copy to: (w/attachment))
EPA Region IV (Ms. Gena Townsend)
MCB Camp Lejeune (Mr. Neal Paul)
(w/o attachment)
Baker Environmental (Mr. Ray Wattras, Ms. Tammi Halapin)

Blind copy to:
1823 (LGB) 2 copies w/encls)
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**RESPONSES TO NORTH CAROLINA DEHNR COMMENTS ON THE
DRAFT RECORD OF DECISION
OPERABLE UNIT NO. 5 (SITE 2)
MARINE CORPS BASE, CAMP LEJEUNE, NORTH CAROLINA**

1. The text has been revised in response to this comment. The selected alternative includes groundwater monitoring in order to assess whether shallow groundwater contamination is migrating off site and/or to potable supply wells.
2. The text has been revised in response to this comment. Restrictions will be placed on installation of new potable water supply wells.
3. In January 1994, additional geophysical investigation activities were conducted in the area of the subsurface anomaly. This focused reinvestigation indicated that there are no subsurface features in this area. The anomaly detected during the original (1992) geophysical investigation may have been due to an echo or interference from monitoring well 2GW3.

A limited number of organic and inorganic contaminants were detected in groundwater in concentrations exceeding Federal (MCLs) and North Carolina (NCWQS) standards. In order to implement the preferred alternative, Groundwater RAA No. 2, a waiver from these standards will be required.

CERCLA regulations provide for a number of circumstances in which a waiver can be invoked. These include the inconsistent application of state requirements. The North Carolina Administrative Code (T15A:02L.0100[k]) includes criteria for requesting that the state approve a corrective action plan without requiring groundwater remediation to state standards (NCWQS). Based on the results of the RI/FS for this operable unit, MCB Camp Lejeune/DoN feel that these criteria are met or will be met under the preferred alternative. MCB Camp Lejeune/DoN will therefore submit a request for a waiver from groundwater standards to NCDEHNR under separate cover.

4. The text has been revised in response to this comment. Surface water and sediment outside the area of the Time-Critical Removal Action (TCRA) will not be addressed by the proposed remedial action. Sediment in the railroad track drainage ditch in the vicinity of the mixing pad area is included in the TCRA. This section has been revised to clarify this.

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director

Post-It™ brand fax transmittal memo 7671		# of pages	7
To	DAN SHIELDS		
From	LINDA BERRY		
Co.	BERRY		
Dept.	CLEM		
Phone #	(919) 322 4793		
Fax #	(919) 322 4805		

February 2, 1994

Commander, Atlantic Division
Naval Facilities Engineering Command
Code 1823-1
Attention: MCB Camp Lejeune, RPM
Ms. Linda Berry, P. E.
Norfolk, Virginia 23511-6287

Commanding General
Attention: AC/S, EMD/IRD
Marine Corps Base
PSC Box 20004
Camp Lejeune, NC 28542-0004

RE: Draft Record of Decision for Operable Unit #5 (site 2)

Dear Ms. Berry:

The referenced document has been received and reviewed by the North Carolina Superfund Section. Our comments are attached. Please call me at (919) 733-2801 if you have any questions about this.

Sincerely,

Patrick Watters

Patrick Watters
Environmental Engineer
Superfund Section

Attachment

cc: Gena Townsend, US EPA Region IV
Neal Paul, MCB Camp Lejeune
Bruce Reed, DEHNR - Wilmington Regional Office

North Carolina Superfund Comments
Camp Lejeune MCB Operable Unit 5
Draft Record of Decision

1. Page vii
The second paragraph on the page indicates that one of the primary goals of the selected remedy is to "prevent migration of the contamination plume." It seems inappropriate to make this claim when the preferred remedy (RAA No. 2) had been established in the Proposed Remedial Action Plan as a remedy that would still permit migration of contamination.

2. Page vii
As noted in the comments on the Feasibility Study and the PRAP, the types of wells (i.e. potable wells, all wells, etc.) to be restricted if RAA No. 2 is implemented is not completely clear.

3. Page 5, Section 2.0
The fourth paragraph states that the July 1992 geophysical investigation did not identify any anomalies that could serve as sources of groundwater contamination. Appendix A of the Remedial Investigation Report indicates the geophysical survey was conducted on August 29, 1992. Appendix A also noted that radar records from the geophysical survey near well 2GW3 did indicate the presence of a "large buried object". The data was, however, not conclusive enough to determine if the object was a tank, utility line or other buried structure.

A variance from the groundwater rules will be necessary to use the selected remedy (RAA No.2). Source identification and removal could be an issue with regard to this variance, therefore, it may be appropriate to conduct conclusive investigations of the geophysical anomaly near well 2GW3.

4. Page 8, Section 4.0
This section states that sediment will not be addressed under this remedial section for various reasons. The Feasibility Study and the Proposed Remedial Action Plan indicate that both contaminated soils and sediment will be addressed via the Time Critical Removal Action. Also, the last bullet on page 9 acknowledges that there is contaminated sediment along the railroad drainage ditch.