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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

March 9, 1995

Commander, Atlantic Division
Naval Facilities Engineering Command
Code 1823-2

Attention: MCB Camp Lejeune, RPM
Ms. Katherine Landman
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 Surficial Groundwater
at Operable Unit 10 (Site 35), MCB Camp Lejeune.

Dear Ms. Landman:

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
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
Draft Record of Decision For Surficial Groundwater
Operable Unit 10 (Site 35) MCB Camp Lejeune

1. Page vi; Declaration
While page vii does indicate that this ROD applies only to a portion of the surficial aquifer, the first sentence of the sections titled Statement of Basis and Purpose and Description of Selected Remedy on page vi implies that this remedy is for the entire surficial aquifer at OU 10.
2. Page 6, Section 4.0
The first paragraph describes the area addressed by this interim action as "...organic chemical contaminated groundwater in the surficial aquifer located roughly in the area between the right-of-way (ROW) of the proposed highway and Brinson Creek." Between the RI Report, the FS, the PRAP and ROD, different descriptions are used for the area to be addressed by this interim action. See also NC Superfund comment # 1 on the Interim FS/PRAP (dated 2/22/95). To avoid misinterpretation and confusion, please use consistent language in the RI/FS/PRAP/ROD to describe affected sites.
3. Page 17, Section 7.0
Since the selected remedy (RAA 5) requires a pilot test, should this ROD be written with a contingency just in case the pilot test shows that the selected method is not feasible?
4. Page 17, Section 7.0
Execution of the selected remedy is dependent upon NCDOT incorporating certain design features in the proposed highway. We understand that discussions with NCDOT have taken place and that continued dialogue is expected in the near future. Please keep NC Superfund apprised of developments with the NCDOT discussions. Also, NC Superfund would like to receive copies of pertinent written agreements that are established between NCDOT and LANTDIV for Site 35.
5. Figure 2
The limits shown for the Interim FS Study Area are different than that shown in Figure 2 in the PRAP.
6. Figure 7
This figure (for RAA # 5) shows an Interceptor Trench which applies only to RAA # 4.