

0401-02/13/97-01862



DEPARTMENT OF THE NAVY
ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1510 GILBERT ST
NORFOLK, VA 23511-2699

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13 FEB 1997

CERTIFIED MAIL RETURN RECEIPT REQUESTED

United States Environmental Protection Agency, Region IV
Attn: Ms. Gena Townsend
Atlanta Federal Center
Waste Management Division
Federal Facilities Branch
100 Alabama St. S.W.
Atlanta, Georgia 30303-3104

Re: Response to Comments, Draft Proposed Remedial
Action Plan and Record of Decision, OU Number 6
(Sites 36, 43, 44, 54, and 86), MCB Camp Lejeune, N.C.

Dear Ms. Townsend:

Enclosed please find responses to your comments on the subject documents. These responses are being submitted in lieu of a Draft Final version of the documents. In order to allow outstanding issues to be discussed and resolved at the upcoming March 19-20 partnering Meeting in Raleigh, N.C., please provide comments on these responses by March 17, 1997.

The Navy/Marine Corps appreciates your continued involvement in this project. Please direct any questions or comments to Ms. Katherine Landman at (757) 322-4818.

Sincerely,

A handwritten signature in cursive script, appearing to read "L. G. Saksvic".

L. G. SAKSVIC, P.E.

Head

Installation Restoration Section
(South)

Environmental Programs Branch

Environmental Division

By direction of the Commander

Attachment

Re: Response to Comments, Draft Proposed Remedial
Action Plan and Record of Decision, OU Number 6
(Sites 36, 43, 44, 54, and 86), MCB Camp Lejeune, N.C.

Copy to:

NC DEHNR (Mr. Dave Lown)

MCB Camp Lejeune (Mr. Neal Paul)

Baker Environmental, Inc. (Mr. Matt Bartman, Mr. Rich Bonelli)

~~Activity Admin Record File~~

**RESPONSE TO COMMENTS
DRAFT RECORD OF DECISION
OU NO. 6 - SITES 36, 43, 44, 54, AND 86**

United States Environmental Protection Agency
Region 4, Atlanta Federal Center
Comments Dated October 8, 1996

Site 36

1. Additional information has been included within the Final RI (Section 6.8.3) that documents literature values related to lead levels in various media; i.e., soil, shellfish, etc. Relevant information related to the lead levels will be included for support within the Final FS, PRAP, and ROD documents. Lead was detected above the OWSER surface soil value of 400 mg/kg twice, (locations OA-SB04 and OA-SB08). These two exceedances are located approximately 900 feet apart and do not appear to form a pattern of surface soil lead contamination. The result of a recently conducted subsurface soil (collected 3 to 3.5 feet below the ground surface at location 36-OA-SB07R) TCLP analysis supports the RI/FS conclusion that lead does not appear to be leaching to groundwater. The detected TCLP lead level was 0.115 mg/L, which is below the federal TCLP lead limit of 5 mg/L. In addition, lead was detected three times in groundwater at locations north and northwest of the above noted surface soil locations; i.e., 36-GW10DW, 36-GW12IW, and 36-GW13IW. Each of these groundwater detections were below the NCWQS of 15 µg/L.
2. Surface water and sediment locations will be added to Figure 36-3.
3. Comment so noted.

Site 44

1. Concur with comment. A brief discussion related to the preliminary findings of Site 89, in relation to associated groundwater and surface water impacts at Site 44, will be added to the ROD. Note that the volatile organic compounds identified at Site 89 and Edwards Creek will be addressed during Baker's upcoming field program schedule for the Spring/Summer of 1997.

Site 54

1. Comma will be added.
2. Verb tense will be modified as noted.
3. Typographical errors will be corrected in Table 54-1.

Site 86

1. The FS evaluated extraction with on-site treatment, as well as, in-well aeration for the volatile groundwater contamination at Site 86. The industrialized nature of this site, coupled with knowledge that the VOCs detected in the groundwater do not generate unacceptable human health risks, justify the re-evaluation of the proposed remedial action. The Final PRAP and ROD will recommend Institutional Controls, based upon supporting groundwater modeling and proof of remedial success via natural attenuation.

**RESPONSE TO COMMENTS
DRAFT PROPOSED REMEDIAL ACTION PLAN (PRAP)
OU NO. 6 - SITES 36, 43, 44, 54, AND 86**

**Environmental Protection Agency (EPA) Office of Health Assessment
Comments Dated July 17, 1996**

1. Additional rationale related to the higher levels of iron in the groundwater for each of the five sites within OU 6 will be included within the Final PRAP. More specifically, a comparison of iron detected in Site 36 media will be included within the Final FS, and the Final PRAP/ROD documents.
2. The recommendation for concurrence (by the NC DEHNR and affected local water authority), of the no action decisions related to iron in the groundwater are acknowledged by these parties based upon review and acceptance of the PRAP. Concurrence of this nature is provided and documented formally within the Record of Decision (ROD) by NC DEHNR, as well as the general public (i.e., local water authority whom in this case is MCB, Camp Lejeune, Department of Public Works).
3. The fishing and crabbing access restrictions originally discussed within the Draft FS/PRAP/ROD for Site 36 will be removed from the associated alternative descriptions. Disclosure of the elevated inorganic detections in the fish/crabs, as related to Site 36 and Brinson Creek, have been brought to the attention of Mr. Neal Paul, MCB, Camp Lejeune. Appropriate regulatory agencies will be contacted as necessary.

1823 (KHL)
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