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



James B. Hunt, Jr., Governor
Wayne McDevitt, Secretary
William L. Meyer, Director

November 25, 1997

Commander, Atlantic Division
Naval Facilities Engineering Command
Code 1823

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: Comments on the Draft Feasibility Study
Operable Unit 9, Site 73
Marine Corps Base, Camp Lejeune, North Carolina

Dear Ms. Landman:

The referenced document has been received and reviewed by the North Carolina Superfund Section and our comments are attached. Please call me at (919) 733-2801, extension 278 if you have any questions.

Sincerely,

David J. Lown, LG, PE
Geological Engineer
Superfund Section

Attachment

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

North Carolina Superfund Section Comments
Draft Feasibility Study
Site 73, MCB, Camp Lejeune

1. Page 3-4. Chemical-Specific ARARs. In addition to the potential ARARs discussed in the text, other potential state ARARs are listed in Tables 1 through 3.

TABLE 1
NORTH CAROLINA POTENTIAL CHEMICAL-SPECIFIC ARARS, CRITERIA, AND GUIDANCE
SITE 73 FEASIBILITY STUDY
MCB CAMP LEJEUNE

Potential State ARAR	Citation	Comment
NC Drinking Water Act	130A NCAC 311-327	Regulates water systems and the aquifers that supply them.
NC Water Quality Standards	15A NCAC 2B .0100-.0400	Establishes a series of classifications and water quality standards for surface waters.
NC Air Pollution Control Regulations	15A NCAC 2D, 2H .0600, 2Q	Regulates ambient air quality and establishes air quality standards for hazardous air pollutants.
NC Hazardous Waste Management Rules	15A NCAC 13A .0009 & .0012	Establishes standards for hazardous waste that is excavated and stored or treated as part of Remedial Action.

TABLE 2
NORTH CAROLINA POTENTIAL LOCATION-SPECIFIC ARARS, CRITERIA, AND GUIDANCE
SITE 73 FEASIBILITY STUDY
MCB CAMP LEJEUNE

Potential State ARAR	Citation	Comment
NC Hazardous Waste Management Rules	15A NCAC 13A .0009 & .0012	Location requirements and land disposal restrictions for hazardous waste excavated, stored, and treated onsite.
NC Solid Waste Management Rules	15A NCAC 13B .1600	Site-location requirements for solid waste landfill.
NC Coastal Management	15A NCAC 7H	State guidelines for areas of environmental concern.

TABLE 3
NORTH CAROLINA POTENTIAL ACTION-SPECIFIC ARARS, CRITERIA, AND GUIDANCE
SITE 73 FEASIBILITY STUDY
MCB CAMP LEJEUNE

Potential State ARAR	Citation	Comment
NC Groundwater Corrective Action	15A NCAC 2L .0106	Regulations for cleanup of contaminated groundwater.
NC 15A NCAC 2L Implementation Guidance	Division of Water Quality Guidance Document	Explains implementation of corrective action at groundwater contamination sites.
NC Well Construction Standards	15A NCAC 2C .0100	Construction and abandonment requirements for wells.
NC Injection well construction standards	15A NCAC 2C .0200	Construction requirements for injection wells.
NC Water Quality Discharge Requirements	15A NCAC 2H .0100 & .0200	Waste water requirements for discharges and infiltration galleries.
NC Sedimentation Control Rules	15A NCAC 2H .1000	Establishes requirements for storm water management
NC Hazardous Waste Management Rules	15A NCAC 13A	Design and treatment requirements for hazardous waste TSDs.
NC Solid Waste Management Rules	15A NCAC 13B	Design and monitoring requirements for solid waste disposal sites
NC Air Pollution Control Requirements	15A NCAC 2D, 2H .0600, 2Q	Regulates air quality and establishes emissions standards.

2. Section 3. Table 3-3. Brinson Creek is not located at Site 73.
3. Page 6-6 and page 7-4. **Compliance With ARARs** The Natural Attenuation remedial action alternative must comply with 15A NCAC 2L .0106, particularly section (l), which specifically considers natural attenuation. The requirements for a natural attenuation remedy are outlined in this section and discussed in the *15A NCAC 2L Implementation*

NC Superfund Comments
FS Report, OU09 (Site 73)
Attachment Page 3

Guidance dated 12/6/95 and published by the Division of Water Quality. Before being approved for remediation, the conditions outlined in this rule must be addressed.

4. Appendix B. The surface water standard for vinyl chloride is 525 ug/l, not mg/l. The standard for TCE should also be 92.4 ug/l and not mg/l.