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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

DEHNR

September 9, 1994

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 Final RI/FS Project Plans and Health & Safety Plan for Operable Unit 8, (Site 16); Operable Unit 11, (Sites 7 and 80) and; Operable Unit 12, (Site 3).

Dear Ms. Landman:

The referenced documents have 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
Draft Final RI/FS Project Plan and Health & Safety Plan
Camp Lejeune Operable Units 8, 11 and 12

General Comment

1. Table 8-1 of the OU 8, 11, and 12 Quality Assurance Project Plan lists the various method performance limits applicable to the analyses performed for these operable units. Several of the CRQL performance limits listed for water are higher than the North Carolina 2L groundwater standards. The CRQL performance limits need to be lowered in order to conclusively show when contaminants are at concentrations below the 2L standards.

Specific Comments

2. Page 2-8, Section 2.1.10
This section indicates that Camp Lejeune covers an area of 170 square miles while Section 2.1.1 states that the base covers 236 square miles. It is not clear why the two different areas are used.

3. Page 2-10, Section 2.1.11
This section lists all of the base supply wells within a one-half mile radius of the 4 sites. It would be beneficial to graphically show the locations of these supply wells for each site.

4. Page 2-12, Section 2.3.1
This section indicates that there are two unnamed surface water bodies on Site 7 which we assume to be the "east and west tributaries" as shown on Figure 2-5. If this is not correct, please clarify.

   Also, the second paragraph of this section indicates that there are four areas of concern associated with Site 7. Figure 2-5 does not show where these individual areas are located.

5. Table 2-5
The North Carolina Groundwater Standard (15A NCAC 2L) for total xylenes is 530 ug/L.

6. Table 4-4
This table shows that the groundwater "preliminary remediation goal" for chrysene is 9.2 ug/L. Table 2-8 indicates that the USEPA MCL for chrysene is 2 ug/L. Please explain why the remediation goal is higher than the MCL.

7. Page 3-3, Sections 3.1.2.1 and 3.1.3 and Figure 3-3
These areas of the Sampling and Analysis Plan do not agree on the number of monitoring wells proposed for Site 16. Section 3.1.2.1 indicates 5 wells. Section 3.1.3 states that 4 wells will be used, however, it lists one upgradient well, 3 downgradient wells and 2 wells within the boundary of the dump for a total of six wells. Figure 3-3 also shows six wells in and around Site 16.

8. Page 3-20, Figure 3-10
Figure 3-10 shows an old railroad spur at the southern most end of Site 3. It is not clear if this could be associated with the railroad tank car used to store the creosote for Site 3 (Section 2.5.3). If so, there may be a need to perform additional soil sampling closer to the spur than indicated on Figure 3-10.