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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

April 29, 1996

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: Draft RI Report for Operable Unit 8 (Site 16), Marine Corps Base - Camp Lejeune.

Dear Ms. Landman:

Attached please find comments provided to the Superfund Section by our sister agencies for the above referenced document. Please let me know if you have any questions about this.

Sincerely,

Patrick Watters

Patrick Watters
Environmental Engineer
NC Superfund Section

Attachment

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

DIVISION OF ENVIRONMENTAL MANAGEMENT

Groundwater Section

April 4, 1996

MEMORANDUM

TO: Arthur Mouberry

THROUGH: Rick Shiver RSS

FROM: Charles Stehman CS

SUBJECT: Review of Draft Record of Decision
Operable Unit No. 8, Site 16
USMC - Camp Lejeune
Onslow County
Project #95-35

Bruce Parris with the Groundwater Section of the Wilmington Regional Office provided the comments that are offered below for your consideration. The review involves the Draft Record of Decision for Operable Unit #8, Site 16 at Camp Lejeune. These comments include those from the Air Quality Section, the Water Quality Section, and the Groundwater Section.

Site Summary

Site 16, the Montford Point Burn Dump, is about 4 acres in size. Northeast Creek is located about 400 feet to the southeast. Most of the site is cleared, and used for vehicle staging and vehicle training exercises. Some of the site is comprised of pine and hardwood forest. Limited information is available about the operational history of the burn dump. Practices at other burn dumps indicate that this dump may have accepted municipal waste or trash from the surrounding housing area or activity buildings. However, records indicate that waste oils were disposed at this site.

The site is relatively flat. Groundwater was encountered from 3.68 to 18.43 feet below land surface. Groundwater velocity was calculated at 0.05 feet/day (18.25 feet/year). There are 5 water supply wells within one mile of the site, however, none of these wells are downgradient of the site.

PCBs were detected above USEPA guidance of 1.0 ppm for residential areas, but fell below the 10-25 ppm criteria set forth for industrial areas. Concentrations ranged from 0.041 to 2.1 ppm. The site is presently categorized as a "classroom training facility" under Camp Lejeune's Base Master plan. The report states that the land use category for this site is not expected to change.

Table 1 (PRAP) summarizes the contamination found at the site. It was noted that benzene was detected in groundwater at 37 ug/l in an initial sampling event, but was not detected in a second event. Bis(2-Ethylhexyl) phthalate was detected in both sampling events from 1.0 to 5.0 ug/l, and iron was elevated in one of six samples. Several compounds were detected in surface water about one-quarter mile downstream from the site. Other compounds detected at the site are mentioned below in the risk assessment discussion.

A Baseline Human Health Risk Assessment was performed by the Navy's consultant. It shows that there may be a concern for noncarcinogenic health effects as the HI value for future residential children exceeded the 1.0 criteria at 1.19. PCB, detected in soil, attributed to 52% of this risk.

An Ecological Risk Assessment was also performed for this site. Manganese exceeded a surface water screening value (SWSV), and silver exceeded a sediment screening value. A slight potential adverse impact to aquatic receptors is expected from these compounds. The report stated that these contaminants did not appear to be site-related since there is no correlation between the sample concentration and the proximity of the sample to the site. Based upon several COPCs in surface soil samples, there is a potential for adverse impacts to terrestrial flora and fauna. However, it was noted that the surface soil screening exceedances are not expected to be ecologically significant because the current use of the land is not conducive to habitats of the modeled ecological receptors. There also was a risk to the cottontail rabbit. This risk was considered negligible, however, because the model did not account for most of the site being unvegetated.

There was also a noted risk to the raccoon due to the aluminum detected in surface waters. However, the consultant stated in the report that the detection of aluminum was not site-related, therefore a significant risk was not apparent from site-related COPCs.

Since the second round of samples did not yield any significant groundwater violations, the Draft Record of Decision recommends no further action.

Air Quality Section Comments

No comments have been received from the Air Quality Section.

Water Quality Section Comments

No comments have been received from the Water Quality Section.

Groundwater Section Comments

"No Further Action" was the preferred remedial alternative selected in the report. The Groundwater Section feels that no further action for this site, in regard to groundwater, is appropriate since no substantial violations of 2L standards were detected in the samples collected from the second sampling event. The NC Superfund Section should decide whether the PCB-laden soils need to be removed. If the PCB-laden soils are to be left in-place, the Groundwater Section recommends that leachate calculations be performed on the PCB-laden soils to ensure that potential future impacts to groundwater from the contaminated soils are negligible.

If you have any questions, please do not hesitate to contact Bruce Parris or myself at (910)395-3900.

RSS/CFS/BRP/gjg

cc: Patrick Watters
WiRO-AQS, WiRO-WQS, WiRO-GWS

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