06.01- 06/20/96-01689

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

June 20, 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 Proposed Remedial Action Plans and Record of Decision for Operable Unit 11 (Sites 7 and 80), MCB Camp Lejeune.

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 x-282 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
Diane Rossi, DEHNR - Wilmington Regional Office

Draft Proposed Remedial Action Plan
Draft Record of Decision
Operable Unit 11, Sites 7 and 80
MCB Camp Lejeune
Jacksonville, NC

1. **General**

The proposed plan for Site 7 is one of no action. The State cannot concur with this conclusion based on the following:

- There are several compliance problems (with both Federal and State environmental standards) with the surface water and groundwater samples taken at Site 7. Also, we only have data from shallow wells and since contamination was detected in the shallow aquifer, verification of the deeper aquifer quality will need to be done for Site 7.

Groundwater

Constituent	Frequency Above Standards
Chloroform	2/8
Aluminum	5/8
Chromium	1/8
Iron	5/8
Lead	3/8
Manganese	2/8

Surface Water

Constituent	Frequency Above Standards
bis(2-Ethylhexyl)phthalate	1/13
Dieldrin	2/13
Arsenic	2/13
Iron	9/13
Manganese	1/13
Lead (NC Limit = 25 ug/L)	1/13 ***
Zinc (NC Limit = 86 ug/L)	1/13 ***
Copper (NC Limit = 3 ug/L)	1/13 ***
Magnesium (NC Limit = 200 ug/L)	13/13 ***

{Federal limit for Magnesium also exceeded)

*** North Carolina regulatory limits for these constituents were not shown in Table 3 nor were they flagged as being above any standards. Other NC Surface Water regulatory limits absent from Table 3 are as follows:

Arsenic	50 micrograms/L
Barium	1.4 milligrams/L
Manganese	3.5 milligrams/L
Iron	1 milligram/L

- Several surface soil samples indicated elevated values of beryllium (10 out of 32) and arsenic (6 out of 32) above the Region III RBC SSLs.

- Several sediment samples yielded elevated values for a few inorganics and pesticides (i.e. Dieldrin, DDE, DDD, and DDT) above the NOAA ER-L and ER-M criteria.

- The calculated risk for the future residential adult groundwater exposure scenario is above the EPA limit of 1E-04.

- The calculated Hazard Index for the future residential child groundwater exposure scenario is greater than the EPA limit of 1.0.

- This is an old dumping ground immediately adjacent to a public community center and reasonably close to the Tarawa Terrace base housing area.

While the RI did not show any major areas of contamination requiring active remediation, it is important to at least continue to monitor the groundwater and sediment to catch any deterioration of the conditions at Site 7.

2. **Page 7 - Human Health Risk Assessment**
The last paragraph of this section states that the calculated risk is above the EPA limits but is insignificant. By regulatory definition a carcinogen at a concentration resulting in a calculated risk above 1x10-4 to an individual is not an acceptable exposure level and therefore should not be called insignificant.

3. **Table 3**
The 10 detections of beryllium in the surface soils above the Region III RBC is not highlighted

4. **Table 10**
The surface soil values for aldrin, dieldrin, DDD and DDT above the Region III RBCs are not shaded.

The number in the shaded area for nickel in the round 2 groundwater data appears to be incorrect. It shows 8 and it looks like it should be 0 and therefore not shaded.