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NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT

April 9, 1998



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: NC Superfund Comments on the
Draft Remedial Investigation Report
Operable Unit No. 16, Sites 89 and 93
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

Attachments

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

ATTACHMENT 1

North Carolina Superfund Section Comments
Draft Remedial Investigation Report - OU 16, Sites 89 and 93
Marine Corps Base, Camp Lejeune, North Carolina

1. Figure 3-1. The 5-foot contour line is mislabeled 15.
2. Page 4-5. The *EPA Soil Screening Guidance: Technical Background Document and User's Guide*, as applied in the draft *North Carolina Risk Framework*, should be used to evaluate soils collected from above the water table for the soil-to-groundwater pathway.
3. Page 8-3. Conclusion 11 contains an incomplete sentence and its meaning is not clear.

Comments Submitted by David Lilley on Sections 6 and 7

4. Page 6-7, Section 6.2.4. Surface soil needs to be sampled and evaluated in the BRA.
5. Page 6-6, last paragraph. According to the US EPA Region IV Supplemental Guidance to RAGS, Human Health Risk Assessment Bulletin No. 1, page 1-4, 1995, "Any member of a chemical class that has other members selected as COPCs should be retained (e.g., detected carcinogenic polynuclear aromatic hydrocarbons)." All the carcinogenic PAHs detected in the Site 89 sediment should be retained as COPCs.
6. Page 6-11. The sample results for semivolatiles and pesticides/PCBs are not included in Appendix H. Please provide these results.
7. Page 6-18, Section 6.3.4.5. According to the US EPA Region 4 Supplemental Guidance to RAGS, Human Health Risk Assessment Bulletin No. 3, page 3-4, "It should be assumed that showering exposure is equivalent to exposure from ingestion of two liters of contaminated water per day." Although using this procedure will not change the results for this BRA, it is recommended this procedure be used in future BRAs.
8. Page 7-1, fourth paragraph. Since the surface soil was not sampled, it is not possible to rule out the terrestrial habitat. It is recommended surface soil samples be collected and analyzed for these sites.
9. Table 7-2. The range of positive detections for trichloroethene is 0.3 - 2,400 on this table, but 35 - 230 on Table 6-5. Please correct this inconsistency.
10. Table 7-1. The chronic US EPA Region IV screening value for antimony is 160 ug/l, not 150 as listed. Please correct.