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MCB CAMP LEJEUNE  
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LETTER AND NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL  
RESOURCES COMMENTS ON THE DRAFT PROPOSED REMEDIAL ACTION PLAN FOR  
OPERABLE UNIT 14 SITE 69 MCB CAMP LEJEUNE NC MCB CAMP LEJEUNE NC  
5/31/2012  
NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES



North Carolina Department of Environment and Natural Resources

Beverly Eaves Perdue  
Governor

Dee Freeman  
Secretary

May 31, 2012

Mr. Dave Cleland  
NAVFAC Mid-Atlantic  
Code: OPCEV  
NC/Caribbean IPT, EV Business Line  
6506 Hampton Blvd  
Norfolk, VA 23508-1273

RE: Comments on the Draft Proposed Remedial Action Plan (PRAP) for OU #14, Site 69  
NC6170022580  
MCB Camp Lejeune  
Jacksonville, Onslow County, North Carolina

Dear Mr. Cleland:

The NC Superfund Section has received and reviewed the Draft Proposed Remedial Action Plan (PRAP) for Operable Unit 14, Site 69, dated May 2012, for Camp Lejeune, MCB located in Jacksonville, NC. The following comments are offered for the Partnering Teams consideration. If you have any questions or comments please contact me at (919) 707-8341.

### General Comments

With the exception of the specific comments noted below, the Proposed Remedial Action Plan (PRAP) appears to be in good order and the NC Superfund Section concurs with the preferred proposed alternatives for the soil and groundwater remedies at Site 69.

### Specific Comments

1. The Last paragraph on page 5 states that “buried Waste at the site suggest that soil within the waste disposal area is contaminated.” This may be true, but the greatest indication that soil is contaminated in the burial area is the fact that groundwater in the area of MW-GW15 installed through the waste material, is contaminated with COCs that are at least two to three orders of magnitude greater than the groundwater in all the other monitoring wells in the area. Please make appropriate corrections or additions.
2. Table 8- Groundwater, gives Alternative 2, Monitored Natural Attenuation (MNA) a “high ranking” for Short Term Effectiveness. As you know MNA is only effective in the long term and “would likely exhibit the least short term effectiveness” as stated in the text on page 13. Please make appropriate corrections in Table 8 – Groundwater.
3. The first paragraph at the top of page 16 doesn’t specifically mention fencing controls. We have not discussed the existing fence. The NC Superfund Section would recommend that the fence remain in place or be replaced following cap installation. The fence is an

important control measure since hunting and other range activities are ongoing in the Site 69 area.

4. The last sentence on page 16, states that the preferred alternative satisfies the following requirements, including number 5, “satisfaction of the preference for treatment as a principal element.” Monitored Natural Attenuation (MNA) is not considered an active treatment remedy by the EPA or the State. Please remove requirement 5 from this sentence.

If you have any questions or comments, please contact me, at (919) 707-8341 or email [.mcelveen@ncdenr](mailto:mcelveen@ncdenr).

Sincerely,

Randy McElveen  
Environmental Engineer  
NC Superfund Section

Cc: Dave Lown, NC Superfund Section, Electronic only  
Charity Rychak, EMD/IR  
Bryan Beck, NAVFAC  
Gena Townsend, EPA Region IV