

M67001.AR.005528
MCB CAMP LEJEUNE
5090.3a

LETTER AND COMMENTS FROM U S EPA REGION IV ON DRAFT REMEDIAL
INVESTIGATION/FEASIBILITY STUDY OPERABLE UNIT 23 (OU23) SITE 49 SUSPECTED
MINOR DUMP SITE MCB CAMP LEJEUNE NC
7/3/2012
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303

July 3, 2012

NAVFAC Mid-Atlantic
Attn: David Cleland Code: OPQE3
USMC North Carolina IPT, Business Line
6506 Hampton Blvd
Norfolk, VA 23508-1273

SUBJ: MCB Camp Lejeune
Draft Remedial Investigation/Feasibility Study
Operable Unit 23
Site 49, Suspected Minor Dump Site

Dear Mr. Cleland:

The Environmental Protection Agency has completed its review of the above subject document, dated May 2012. Comments are enclosed.

If there are any questions, I can be reached at (404) 562-8538.

Sincerely,

Gena Townsend
Gena D. Townsend
Senior Project Manager

Digitally signed by Gena Townsend
DN: cn=Gena Townsend, o=Superfund Division,
Federal Facilities Branch, ou=Environmental Protection
Agency, email=townsend.gena@epa.gov, c=US
Date: 2012.07.03 14:08:39 -0400

Enclosure

cc: Randy McElveen, NCDENR
Charity Rychak, MCB Camp Lejeune

1. Section 8.1, Remedial Action Objectives – Should include statements that identify the potential risk that would occur if these actions were not taken. Include the following statement: “The RAOs for the remediation of groundwater at Site 49 are based upon the potential presence of future residential receptors and the potential that groundwater at Site 49 may be used for potable purposes in the future”.

Also, revise the sentence immediately above the table in this section to read: “clean up goals for Site 49 are provided as follows” instead of “the proposed clean up levels for the COCs are presented as follows”.

2. Table 8-1, Potential Chemical-Specific ARARs – This table is missing the groundwater classification ARARs. See example below from the Site 89 FS and make the appropriate corrections: (example may not be readable, refer to the Site 89 FS for clarity). Also, remove the word “potential” from the table’s title.

TABLE 3-1
 Chemical-Specific ARARs
 Feasibility Study
 Operable Unit No. 15 (Site 89)
 MCB CamLej, North Carolina

| Federal and North Carolina Chemical-Specific ARARs | | | |
|--|--|---|-------------------------------|
| Media | Requirement | Prerequisite | Citation |
| Classification of contaminated groundwater | Groundwaters in the state naturally containing 250 mg/L or less of chloride are classified as GA (Existing or potential source of drinking water supply for humans) under 15A NCAC 02L .0201(1) | Groundwaters located within the boundaries or under the extraterritorial jurisdiction of the State of North Carolina - Applicable | 15A NCAC 02L .0302(1) |
| | Groundwaters in the state naturally containing greater than 250 mg/L of chloride are classified as GSA under 15A NCAC 02L .0201(2) | | 15A NCAC 02L .0302(2) |
| Restoration of contaminated groundwater | <p>Shall not exceed the groundwater quality standards^[1] for contaminants specified in Paragraphs (a) or (b) for the site related contaminants of concern.</p> <ul style="list-style-type: none"> - 1,1,2,2- PCA (0.2 µg/L) - 1,1,2, - TCA (5 µg/L) - cis-1,2-DCE (70 µg/L) - PCE (0.7 µg/L) - Trans -1,2-DCE (100 µg/L) - TCE (3 µg/L) - Vinyl Chloride (0.03 µg/L) | Class GA or GSA groundwaters with contaminant(s) concentrations exceeding standards listed in 15A NCAC 02L .0202 - Applicable | 15A NCAC 02L .0202(a) and (b) |
| | Shall not exceed the Safe Drinking Water Act National Revised Primary Drinking Water Regulations maximum contaminant levels (MCLs) for organic contaminants specified in 40 CFR 141.61(a). | | |
| Protection of adjacent surface water body | <p>Toxic substances: shall not exceed the numerical quality standards (maximum permissible levels) to protect human health from carcinogens through consumption of fish (and shellfish)</p> <ul style="list-style-type: none"> - 1,1,2,2- PCA (4 µg/L) - TCE (30 µg/L) - Vinyl Chloride (2.4 µg/L) | Tidal Salt Waters classified as Class SC with chemical concentrations exceeding 15A NCAC 02B Standards - Relevant and Appropriate | 15A NCAC 02B .0208(a)(2)(b) |

Notes:

[1] Groundwater quality standards established on the basis of a National secondary drinking water standards are not utilized as remediation goals since these are based on taste, odor and other considerations unrelated to human health.

Draft RI/FS
OU23 – Site 49
US EPA comments
7-3-2012

3. Section 10.1.2, Compliance with ARARs – The reference to “Section 3.1” is not correct. It appears from the text that the section should be 8.3, please verify and correct accordingly.