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MCB CAMP LEJEUNE
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LETTER AND NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES COMMENTS TO DRAFT REMEDIAL INVESTIGATION/FEASIBILITY STUDY SITE 49 OPERABLE UNIT 23 (OU23) MCB CAMP LEJEUNE NC
6/18/2012
NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES

Ritter, Genevieve/VBO

From: Howell, Kevin/CLT
Sent: Friday, February 08, 2013 2:44 PM
To: Monica Marrow
Cc: Ritter, Genevieve/VBO
Subject: FW: CTO-WE36 Site 49 Remedial Investigation/Feasibility Study
Attachments: Jun 18-2012, Draft RI_FS OU23, Site 49.docx

Monica,

Here is the email Randy sent regarding his comments on the Site 48 RI/FS.

Thanks,

Kevin Howell, P.G.
CH2M HILL
11301 Carmel Commons Boulevard
Charlotte, North Carolina
704.544.4040 (main)
704.543.3265 (direct)
704.650.0049 (mobile)

From: Mcelveen, Randy [mailto:randy.mcelveen@ncdenr.gov]
Sent: Monday, June 18, 2012 5:18 PM
To: Howell, Kevin/CLT; david.t.cleland@navy.mil; charity.rychak@usmc.mil; Townsend.Gena@epa.gov; monica.marrow@critigen.com
Cc: Louth, Matt/VBO; Henderson, Kimberly/VBO; Bozzini, Chris/CLT; Williams, Tegwyn/CLT
Subject: RE: CTO-WE36 Site 49 Remedial Investigation/Feasibility Study

The NC Superfund section has completed review and comment on the Draft RI/FS for OU#23, Site 49. My comments are attached for you consideration. A signed hard copy will follow.
Randy McElveen, NC Superfund Section

From: Kevin.Howell@CH2M.com [mailto:Kevin.Howell@CH2M.com]
Sent: Friday, May 25, 2012 9:29 AM
To: david.t.cleland@navy.mil; charity.rychak@usmc.mil; Townsend.Gena@epa.gov; Mcelveen, Randy; monica.marrow@critigen.com
Cc: Matt.Louth@CH2M.com; Kimberly.Henderson@CH2M.com; Chris.Bozzini@CH2M.com; Tegwyn.Williams@CH2M.com
Subject: CTO-WE36 Site 49 Remedial Investigation/Feasibility Study

Team,

A draft copy of the Site 49 RI/FS has been uploaded to the IR Web Portal and is available for your review. Please note that screening levels may have been updated since this evaluation and report was completed. The changes are unlikely to have any impacts on the report conclusions and recommendations and the screening levels can be updated for the final report.

Paper and CD copies will follow next week. Please contact me with any questions.

Have a safe holiday weekend.

Kevin Howell, P.G.
CH2M HILL
11301 Carmel Commons Boulevard
Charlotte, North Carolina
704.544.4040 (main)
704.543.3265 (direct)
704.650.0049 (mobile)

North Carolina Department of Environment and Natural Resources

Beverly Eaves Perdue
Governor

Dee Freeman
Secretary

June 18, 2012

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

RE: State Comments on the Draft Site 49 Remedial Investigation/Feasibility Study (RI/FS)
MCB Camp Lejeune, NC6170022580
Jacksonville, Onslow County, North Carolina

Dear Mr. Cleland:

The NC Superfund Section received and reviewed the Draft Remedial Investigation/Feasibility Study for IR Site 49 located at the Air Station of MCB Camp Lejeune. The Draft RI/FS, dated May 2012, was received for review on May 31, 2012. The Following comments are provided for your consideration and inclusion in the final version of the RI/FS.

1. The page numbers of the Executive Summary appear to be miss-labeled or a page (ii) is missing. Please make appropriate corrections.
2. The CERCLA Balancing Criteria Table on page v of the Executive Summary indicates that No Action and MNA have a high ranking with regard to short term effectiveness. The paragraph following this table explains the reasoning. The EPA and the State do not accept MNA as an active remedy and certainly, No Action has no effectiveness whatsoever. The <u>ranking</u> of the "No Action " remedy should be <u>low</u> and as we discussed regarding the ranking of MNA at Site 69, the <u>ranking</u> of MNA should at the best be <u>medium</u> since it is not an active remedy but has a small environmental foot print regarding energy use and potential work injury relative to the other alternatives. Please make appropriate corrections in the CERCLA Criteria Table and in the paragraph that follows the table, as well as in Section 10.3.5 and throughout the FS.
3. The second bullet on page 4-4 states that PCA and TCA exceed their respective NC SSLs in one subsurface soil sample ((IR49-IS09). This would imply that source contaminants exist at the site that could continue to leach to groundwater at concentrations above the NCAC 2L Groundwater Standards. The 15A NCAC .0106 (f)(4), .0106(k)(1), and .0106(l)(1) require that, for MNA remedies, source removal or control. It appears that we may need to delineate the source contaminant in the area of sample IS09 and complete a treatment or removal action in this area.

4. The ARARs Tables in Section 8 should include NC Sediment and Erosion Control rules, 15A NCAC 4A and 4B and NCGS 113A: 51-66 Article 4. Please make these additions to the action specific ARARs Table in Section 8.
5. Dave Lilley with the Division of Waste Management will be reviewing the Risk Sections of the document and provide comments as appropriate.

If you have any questions or comments, please contact me, at (919) 707-8341 or email randy.mcelveen@ncdenr.gov

Sincerely,

Randy McElveen
Environmental Engineer
NC Superfund Section

Cc: Dave Lown, NC Superfund Section, Electronic Copy Only
Charity Rychak, EMD/IR
Gena Townsend, USEPA
Bryan Beck, NAVFAC