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North Carolina Department of Environment,
Health, and Natural Resources
Attn: Mr. Patrick Watters
P.O. Box 27687
401 Oberlin Road
Raleigh, North Carolina 27611

Re: Response to NC DEHNR Comments on the Draft REmedial Investigation Report for Operable Unit 1, MCB Camp Lejeune, North Carolina

Dear Mr. Watters:

Enclosed please find responses to NCDEHNR comments on the above referenced documents dated March 23, 1994. Responses to these comments were discussed during the meeting held on May 3, 1994 at EPA Region IV offices. Any questions concerning these responses should be directed to Ms. Linda Berry at (804) 322-4793.

Sincerely,

L. A. BOUCHER, P.E.
Head
Installation Restoration Section
(South)
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

Enclosure

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MCB Camp Lejeune (Mr. Neal Paul)
Baker Environmental (Mr. Ray Wattras, Ms. Tammi Halapin)

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Response to Comments Submitted by NC DEHNR on Draft Remedial Investigation Report for Sites 21, 24, and 78 (Operable Unit No. 1), MCB, Camp Lejeune, North Carolina

Comment Letter by Mr. Patrick Watters dated March 23, 1994

RESPONSE TO SPECIFIC COMMENTS 1 THROUGH 22 -

1. The recommendations presented on page ES-24 will be revised to indicate that the deeper aquifer may require remediation or long-term monitoring.

2. The figure will be revised to include the location of the two wells. A note will be added to indicate that wells 24GW05 and 24GW07 no longer exist, and that well 24GW07 was later reinstalled at a different location.

3. Table 1-1 and Figure 1-6 will be revised to match each other.

4. Table 1-3 will be revised.

5. A sentence will be added indicating that the data from Site 22-related monitoring wells will be considered in the RI.

6. Supply wells will be shown where applicable on Figures 1-3 through 1-5.

7. Due to the size of Site 78 (HPIA) and the number of facilities, it would be difficult to consider the entire HPIA drainage system for this RI. Most of the drainage is influenced by storm water drainage systems along the reads and buildings. For purposes of this RI, the groundwater investigation should be adequate to identify potential source areas.

8. The text will be changed per the comment.

9. Table 2-1 will be revised to include areas of concern indicated on Figure 1-3.

   The focus of the investigation at Site 21 was to evaluate impacts from pesticide and PCB disposal. Since these contaminants are not very mobile in the environment, the installation of deep monitoring wells is not practicable.

   The deeper aquifer which underlies Site 21 is the same aquifer which underlies Site 78. Although there are no deep monitoring wells at Site 21, there are several existing deep wells at Site 78 which are located adjacent to the Site 21. The source of the VOC contamination in the shallow groundwater at Site 21 originated from Site 78 and is not

related to disposal activities at Site 21.

10. Based on site history and recent groundwater sampling results for deep supply wells in the area (April 1993), the deep groundwater at Site 24 is not impacted by elevated concentrations of contaminants. Accordingly, deep monitoring wells were not installed at the site.

11. The scope of work for the soil investigation at Site 78 focused on the buildings identified on the table only. A soil gas survey, however, was conducted throughout the site at a number of the buildings identified as potential sources of contamination. Please refer to Figure 2-1 for the locations of the soil gas samples.

    Table 2-3 will be modified to include an investigation of the intermediate and deep groundwater at Site 78.

12. Figure 2-1 will be modified to include Buildings 1106, 1205, 1604, and 1765. Building 1480, however, was not a building targeted for soil gas samples.

13. The area identified on Figure 1-3 as "probable refuse (1944)" was based on interpretations from the EPIC study. Because the area was identified as "refuse" and not "stained" or "ground scar", it was assumed that the area contained surface debris, most likely garbage or scraps. Accordingly, the area was not investigated since the "refuse" was most likely unrelated to the pesticide disposal.

14. Building 902 which is identified on Table 2-3 should be 903. This change will be made on the table. Building 1608 was added to the RI during the field program because of its close proximity to Building 1601 and, therefore, was not considered as part of the original study. Accordingly, it was not included on the table.

15. Although manganese was detected at concentrations above base-specific background levels in surface soils at Site 21, it is not believed that a source of the is manganese is related to site activities (i.e., pesticide and PCB disposal). Concentrations of this magnitude are not uncommon at the Base.

16. This section will be modified to include a discussion of PCBs in the sediment.

17. The buildings within HPIA were previously investigated by ESE via a records search and site visits (Characterization Step Report). In addition, although some of the individual facilities were not investigated (through a soil investigation) during this RI, the groundwater at HPIA was evaluated over a larger portion of the area.

18. No text changes made. Agree that the decrease in contaminant levels in the shallow aquifer could be due to the vertical migration of contaminants. The results from the wells sampled in December 1993 appear to agree with this trend.

19. The paragraph will be revised.

20. The paragraph will be revised.

21. The sentence will be revised.

22. A copy of the EPIC photographs will be submitted to the NC DEHNR in the next version of the report.

P 212 484 541

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