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State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director

DEHNR

March 20, 1996

Commander, Atlantic Division
Naval Facilities Command
Code 1823
Attention: MCB Camp Lejeune, RPM
Ms. Katherine Landman
Norfolk, Virginia 23511-6287

Commanding General
Attention: AC/S, EMD/IRD
PSC Box 20004
Marine Corps Base
Camp Lejeune, NC 28542-0004

RE: Supplemental Groundwater Investigation/Feasibility Study (SGI/FS) for Operable Unit 10, Site 35, MCB Camp Lejeune, Jacksonville, NC

Dear Ms. Landman:

The NC Superfund Section has completed its review of the above referenced document. Our comments are attached. Please call me at (919) 733-2801 x282 if you have any questions about this.

Sincerely,

Patrick Watters

Patrick Watters
Environmental Engineer
NC Superfund Section

Attachment
cc: Neal Paul, MCB Camp Lejeune
Gena Townsend, US EPA Region IV
Grover Nicholson, NC Superfund

North Carolina Superfund Section Comments
Supplemental Groundwater Investigation/Feasibility Study
Operable Unit 10 (Site 35)

1. Page 2, Section 4.0
The second study objective is to determine if Brinson Creek acts as a hydraulic barrier to prevent contaminated groundwater from migrating onto Onslow County property. The Work Plan does not address the potential for any VOC sources that may be on the northeast side of Brinson Creek.

2. Page 4, Section 5.3.2.1
Figure 1 does not show the locations of all of the temporary wells for the Southern Area of Concern (AOC) This section also states that groundwater samples in the Southern AOC are only going to be analyzed for TCE, cis, and trans 1,2 DCE. Based on the RI Report for OU 10, these screening samples should also be analyzed for BTEX and MBTE.

3. Page 6, Section 5.3.4.1
Having only one well cluster on the northeast side of Brinson Creek will not provide enough conclusive data (especially if the analytical result is a non-detect) to meet the first objective noted on page 5. The State would rather see several wells (temporary wells if necessary) placed along the northeast side of Brinson creek to assess any contaminant migration. Since we are trying to determine if contamination has migrated off base, it is very important that we have an adequate number of data points to support our conclusions.

4. Page 7, Section 5.3.4.2
Having only one deep groundwater monitoring well in the Southern AOC will not provide enough conclusive data about vertical contaminant migration for the entire Southern AOC.

5. Page 16, Section 5.9.3.1
Note that ALL drill cuttings must be containerized and found to be non-hazardous before they are spread out on the ground surface.