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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

May 30, 1996

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

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

RE: Draft Feasibility Study for Operable Unit 12 (Site 3), MCB Camp Lejeune.

Dear Ms. Landman:

The referenced document has been received and reviewed by the North Carolina Superfund Section. Our comments are attached. Please call me at (919) 733-2801 if you have any questions about this.

Sincerely,

Patrick Watters

Patrick Watters
Environmental Engineer
Superfund Section

Attachment

cc: Gena Townsend, US EPA Region IV
Neal Paul, MCB Camp Lejeune
Diane Rossi, DEHNR - Wilmington Regional Office

North Carolina Superfund Comments
Draft Feasibility Study
Operable Unit 12 (Site 3) MCB Camp Lejeune

1. Page 3-1, Section 3.1
This section lists only the subsurface soil and surficial groundwater as media of concern for Site 3. RI Groundwater samples from the Castle Hayne aquifer show PAH and fuel contamination above the 2L levels. Because this is the primary drinking water aquifer for the area, it should be listed with the other media of concern.

2. Pages 3-9 through 3-11, Section 3.7.1
Based on the three rounds of groundwater data, the State cannot agree with the conclusions regarding the organics seen in the shallow aquifer and especially those seen in the Castle Hayne aquifer. This section states that there are no groundwater areas of concern and implies that active remediation will not be the chosen alternative for the groundwater at Site 3. The rationale for dismissing the groundwater contamination is the lack of a pattern or consistency to the contamination detected.

The State's disagreement is based on the following points.

- For the shallow aquifer, there is a greater pattern of samples showing contamination than of samples not showing contamination. All three rounds of samples for MW02 and MW06 exhibited organics above the State 2L standards. Eliminating the chloroform value seen in the second round MW02 sample as a lab contaminant still leaves two out of the three rounds of groundwater samples as being unacceptable. Before the State can support the conclusion that the shallow groundwater has not been impacted, THREE CONSECUTIVE rounds of quarterly groundwater data below the 2L standards will be needed for EACH well with sample results above the 2L standards.

- The same is true for the sample results from the deeper aquifer. There is a greater pattern of samples showing contamination than of samples not showing contamination. The first two sampling rounds for the intermediate and deep wells exhibited results above the 2L standards. Before the State can support the conclusion that the Castle Hayne has not been impacted, FOUR CONSECUTIVE rounds of quarterly groundwater data below the 2L standards will be needed for the intermediate and deep wells at Site 3. Four rounds are necessary for these deeper wells because the Castle Hayne is a primary drinking water source.