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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

September 20, 1995

Commander, Atlantic Division
Naval Facilities Engineering Command
Code 1823-2

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 Remedial Investigation Report for Operable
Unit 11 (Site 7), MCB Camp Lejeune.

Dear Ms. Landman:

The referenced documents have 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,

A handwritten signature in cursive script that reads 'Patrick Watters'.

Patrick Watters
Environmental Engineer
Superfund Section

Attachment

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

North Carolina Superfund Comments
Draft Remedial Investigation Report
Operable Unit 11 (Site 7) MCB Camp Lejeune

1. Soil Sampling - General

The level of soil sampling appears to be insufficient to adequately assess this site. This concern is based on several points.

- 1- The sample grid is very coarse (typically greater than 125') which means each sample result is expected to represent a large area of the site.
- 2- Figure 2-1 clearly shows that there are significant areas (in terms of acres) of this site that were not sampled at all. Specifically, there is a large area at the western extreme of the site and areas east of the "western tributary".
- 3- The areas showing the highest pesticides and PCB contamination from previous investigations (see Section 1.4) are areas that were not sampled for this RI.

There needs to be considerably more soil sampling conducted for Site 7 before the State can consider any remediation alternatives presented in a Feasibility Study.

2. Groundwater Sampling - General

The number of monitoring wells appears to be insufficient to adequately characterize the site. The concerns expressed for the soil sampling (as far as spacing, location and number of wells are concerned) also apply to the groundwater sampling performed for this site. Also, there are no deep wells at Site 7.

There needs to be considerably more groundwater sampling conducted for Site 7 before the State can consider any remediation alternatives presented in a Feasibility Study.

3. Base Background

The RI Report (including Appendices) does not supply enough supporting information to allow the State to use the "base background" data as a viable basis of comparison. This comment has been noted for other RI Reports. Also the basis for using the "one order of magnitude greater than background" or the "greater than two times base background" criteria has not been explained.

4. Geophysics

The investigation of Site 7 did not include a geophysics study. Please indicate the rationale for not performing any geophysics work at this site.