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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 NCDEHNR Comments, Draft Final FS and PRAP for
OU#5 MCB, Camp Lejeune, North Carolina

Dear Mr. Watters:

Attached please find responses to NCDEHNR comments on the above
referenced documents dated May 20, 1994. 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

Attachment

Copy to: (w/encl)
EPA Region IV (Ms. Gena Townsend)
MCB Camp Lejeune (Mr. Neal Paul)
Baker Environmental (Mr. Ray Wattras, Mr. Don Shields)

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RESPONSE TO COMMENTS SUBMITTED BY
DEHNR ON THE
DRAFT FINAL FS/PRAP REPORT FOR
OPERABLE UNIT 5 (SITE 2)
MARINE CORPS BASE, CAMP LEJEUNE

I. Comment Letter Dated May 20, 1994

Draft Final Feasibility Study

1. Table ES-2 has been revised in response to this comment. The groundwater remediation level for lead is 15.0 µg/L.
2. These values are based on analytical results of background (collected in areas not impacted by site operations). Samples were collected at MCB Camp Lejeune during this and previous investigations conducted by Baker (Section 4.2.1.2 of the RI Report).
3. The text has been revised in response to this comment. There is no quantitative analysis of uncertainties associated with RGOs provided in this report. The uncertainty analysis is qualitative.
4. TCE was not detected in the groundwater sample collected from this monitoring well during the second round of sampling. The text has been revised to reflect this. Reference to a "reasonable time period" has been deleted.
5. Based on the results of the June 6, 1994 meeting between NC DEHNR, USEPA and LANTDIV and subsequent discussions with NC DEHNR, the following monitoring program was agreed to:

- Analysis:

- VOCs

- Barium (Total and Filtered)

- Beryllium (Total and Filtered)

- Cadmium (Total and Filtered)

- Chromium (Total and Filtered)

Lead (Total and Filtered)
Manganese (Total and Filtered)
Total Suspended Solids
Total Dissolved Solids

- Frequency:

- Years 1-2:

- Quarterly

- Years 3-5:

- Semiannually

- Years 6-30:

- Annually

6. Please refer to the response to Comment No. 5.
7. Please refer to the response to Comment No. 5.
8. The text has been revised in response to this comment.
9. The text has been revised in response to this comment. The sentence referring to aquifer drawdown associated with air sparging and soil venting has been deleted.
10. Inorganics were detected in groundwater samples collected from shallow monitoring wells at the site. Several of these analytes exceeded Federal and/or North Carolina groundwater quality standards. The distribution of detected inorganics in shallow groundwater followed no discernible spatial or temporal pattern that would indicate a likely source. The inorganics detected in groundwater samples at Site 2 may be due predominantly to the presence of soil particles entrained in the groundwater samples and may not be attributable to site operations. As such, the potential exists that inorganics detected in concentrations exceeding Federal and/or North Carolina groundwater quality standards during one round of sampling, may not be detected at these concentrations during subsequent rounds of sampling.

Draft Final Proposed Remedial Action Plan

11. The text has been revised in response to this comment. Long-term monitoring will help to prevent groundwater contaminant migration toward Overs Creek. If groundwater contaminants are observed to be migrating toward Overs Creek, additional remedial steps may be implemented.

12. The text has been revised in response to this comment. There will be no risks in the unacceptable range associated with this media.

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 MR PATRICK WATTERS
 PO BOX 27687
 401 OBERLIN ROAD
 RALEIGH NC 27611

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 p 075 318 593

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