

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

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



November 22, 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: Long-Term Monitoring Work Plan for Remedial
Investigation Sites Operable Unit 4 (Sites 41 and 74),
MCB Camp Lejeune.

Dear Ms. Landman:

The referenced document has been received and reviewed by the North Carolina Superfund Section and our comments are attached. Please call me at (919) 733-2801, extension 349 if you have any questions.

Sincerely,

David J. Lown, LG, PE
Geological Engineer
Superfund Section

Attachment

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

P.O. Box 27687,
Raleigh, North Carolina 27611-7687
Voice 919-733-4996



FAX 919-715-3605
An Equal Opportunity Affirmative Action Employer
50% recycled/10% post-consumer paper

North Carolina Superfund Comments
Long-Term Monitoring Work Plans for Remedial Investigation Sites
Operable Unit 4 (Sites 41 and 74) MCB Camp Lejeune

1. General
EPA's Environmental Investigations Standard Operating Procedures and Quality Assurance Manual (EPA SOP) was updated May, 1996. The sections of the EPA SOP on low-flow sampling of groundwater are particularly pertinent. Please refer to this document and update the sections of this work plan as needed. I can provide a copy if needed.
2. Page 3-1, Section 3.1 Sampling
The number and spacing of proposed groundwater monitoring wells appears to be adequate; however, this section states that sampling points "were selected as a result of contamination levels detected during the remedial investigation." Were monitoring wells for groundwater up-gradient and down-gradient of potential groundwater contamination considered for sampling?
3. Pages 3-4 and 3-5, Sections 3.3.1 and 3.3.2, Field Measurements
In addition to the measures listed here, the EPA SOP recommends measuring Nephelometric Turbidity Units (NTUs). Turbidity should be stabilized at or below 10 NTUs before sampling.
4. Tables 3-2
Naphthalene was detected previously in groundwater from well 41DGW11. This compound should be included in the groundwater sampling from well 41DGW11.
5. Table 3-2 (Continued)
Pesticides and heptachlor were detected in the groundwater at Site 74. These compounds should be included in the sample plan for groundwater from this site.