

04.01-04/02/98-02250

NORTH CAROLINA DEPARTMENT OF  
ENVIRONMENT AND NATURAL RESOURCES  
DIVISION OF WASTE MANAGEMENT

April 2, 1998

JAMES B. HUNT JR.  
GOVERNOR

WAYNE McDEVITT  
SECRETARY

WILLIAM L. MEYER  
DIRECTOR

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: Baker Response to Comments on the  
Draft Groundwater Modeling Report  
Operable Unit No. 9 (Site 73)  
Marine Corps Base Camp Lejeune

Dear Ms. Landman:

The Superfund Section has completed its review of the responses to our comments on referenced document and believe that our major concerns have been addressed, or will be addressed in the final report. The report of contamination in production well BB-44 was a major source of apprehension. According to Baker's response, the TCE contamination at BB-44 was below state standards. The well was re-sampled and found to be clean.

We want to reemphasize the reason for our initial concern. Highly permeable zones in the Castle Hayne limestone layers may be pathways for the rapid migration of contaminants. If the water in a high production limestone is contaminated, there is the potential for the production well to pull contamination from a considerable distance. A MODFLOW model that does not incorporate the permeability pathway would not recognize this. While this is not the case at Site 73, we believe that the impact of highly permeable limestone should be carefully considered any time the Castle Hayne aquifer contains pollutants, particularly if a nearby production well is contaminated.

Ms. Katherine Landman  
April 1, 1998  
Page 2

If you have any questions or comments, please call me at (919) 733-2801, ext. 278. We look forward to continued progress on the environment at Camp Lejeune.

Sincerely,

A handwritten signature in black ink, appearing to read "David J. Lown". The signature is fluid and cursive, with the first name "David" being the most prominent.

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

cc: Gena Townsend, US EPA Region IV  
Michael P. Senus, MCB Camp Lejeune  
Diane Rossi, DEHNR - Wilmington Regional Office