DEPARTMENT OF THE NAVY

ATLANTIC DIVISON NAVAL FACILITIES ENGINEERING COMMAND 1510 GILBERT ST NORFOLK, VA 23511-2699 06.01-12/13/96-01827

TELEPHONE NO:

(757) 322-4818 IN REPLY REFER TO:

5090 18232:KHL:cag 13 DEC 1996

## CERTIFIED MAIL RETURN RECEIPT REQUESTED

North Carolina Department of Environment, Health, and Natural Resources Attn: Mr. David J. Lown P.O. Box 27687 401 Oberlin Road Raleigh, North Carolina 27611

Re: MCB Camp Lejeune Response to NC DEHNR Comments Draft Long-Term Monitoring Plan Operable Unit Number 4 (Sites 41 and 74)

Dear Mr. Lown:

Attached are Navy/Marine Corps responses to NC DEHNR comments on the above-referenced document. These responses address your comments dated November 22, 1996. The Final version of the document will incorporate these comments and will be issued December 31, 1996.

Please direct any questions or concerns to Ms. Katherine Landman at (757) 322-4818.

Sincerely,

M. Anontesimorfour

L. G. SAKSVIG, P.E. Head Installation Restoration Section (South) Environmental Programs Branch Environmental Division By direction of the Commander

Attachment

Re: MCB Camp Lejeune Response to NC DEHNR Comments Draft Long-Term Monitoring Plan Operable Unit Number 4 (Sites 41 and 74)

116 182

Copy to:

EPA Region IV (Ms. Gena Townsend) MCB Camp Lejeune (Mr. Neal Paul) Baker Environmental, Inc. (Mr. Matt Bartman) Activity Admin Record File

## **Response to Comments**

## Submitted by the North Carolina Department of Environment, Health, and Natural Resources on the Long-Term Monitoring Work Plan for Operable Unit No. 4 (Sites 41 and 74) MCB, Camp Lejeune, North Carolina

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## Comment Letter by Dave Lown dated November 22, 1996

- 1. The comment will be taken under advisement. The most recent version of the USEPA Region IV's Standard Operating Procedures will be referenced in the text when applicable.
- 2. Up-gradient and down-gradient wells were not considered points for sampling. Wells included in the long-term monitoring were selected based on contamination levels detected during the RI phase or the baseline sampling phase. These wells were selected because of previous sampling has indicated exceedences. Additionally, the selection of these wells for monitoring will assist in preparing concentration trends. Up-gradient and down-gradient wells may be added to the monitoring plan if during the course of the sampling contamination is believed to be migrating from the site. This plan is updated on an annual basis over the course of the monitoring program in order to address the need to add or delete sampling points and analytical parameters. Regulatory approval will be required prior to instituting any modifications to the monitoring program.

3. In addition to measurements for pH, specific conductance, dissolved oxygen, and temperature turbidity will also be measured. Turbidity measurements will be below 10 NTU in order to demonstrate stabilization prior to acquisition of the sample.

4. Although detected in the groundwater during the RI and the baseline sampling, naphthalene, was not reported at a concentration that exceeded federal or state groundwater criteria during any of these rounds. Therefore, the need to sample groundwater for naphthalene is not warranted and will not be conducted.

5. The NC WQS established for heptachlor (.008 ug/L) was exceeded in one groundwater sample (0.01 ug/L) collected during the first round of the RI. Pesticides were not reported in the groundwater samples collected during the baseline sampling. Therefore, the need to monitor for this pesticide is not warranted and will not be added to the long-term monitoring sampling.