

M67001.AR.006292
MCB CAMP LEJUENE
5090.3a

U S NAVY RESPONSE TO COMMENTS ON RCRA FACILITY INVESTIGATION WORK PLAN
SOLID WASTE MANAGEMENT UNIT 474 (SWMU 474) MCB CAMP LEJEUNE NC
2/18/2009
CH2M HILL

RESPONSE TO COMMENTS
RCRA Facility Investigation (RFI) Work Plan
SWMU 474
MCB Camp Lejeune, North Carolina

PREPARED FOR: Andrew Smith, MCB Camp Lejeune EMD
Bryan Beck, NAVFAC Mid-Atlantic
Beth Hartzell, NCDENR

PREPARED BY: CH2M HILL

DATE: February 18, 2009

Introduction

The purpose of this document is to address comments to the RCRA Facility Investigation (RFI) Work Plan for SWMU 474 dated December 12, 2008. The North Carolina Department of Environment and Natural Resources (NCDENR) provided the comments listed below. The responses to comments (RTCs) are provided in bold.

1. The final paragraph of Section 2.2 states that "it was reported that XX groundwater samples exceeded." The number of groundwater exceedences should be added to the sentence.

The final paragraph of Section 2.2 has been revised as follows, "The findings of the CSI indicated that VOCs, SVOCs, and RCRA Metals did not exceed relevant screening criteria in surface or subsurface soils. However, it was reported that groundwater samples collected from three temporary wells (SWMU 474- TW02, -TW06, and -TW08) exceeded the NCGWQS (and Base background concentrations for metals) for at least one of the following: tetrachloroethene (PCE), 1,4-dichlorobenzene, arsenic, chromium, and lead."

2. In Section 5.3.6, it is not clear how the location of the 4 permanent monitoring wells will be determined. The criteria for locating the wells should be included.

The criteria for determining the locations of the 4 permanent monitoring wells is discussed in Section 5.3.4, *Permanent Monitoring Well Installation*. The first paragraph under the *Permanent Monitoring Well Installation* sub-heading has been revised as follows, *“Following critical evaluation of the laboratory analytical data derived from analysis of groundwater samples collected from the temporary wells, in addition to historical (November 2006 CSI) groundwater analytical data, CH2M HILL will, if necessary, make recommendations for the citing of additional permanent groundwater monitoring wells. Water level measurements will be collected at each of the temporary wells and used to determine groundwater flow direction within the vicinity of the SWMU. The proposed permanent wells would be constructed during a second mobilization using hollow stem auger (HSA) drilling techniques. One permanent shallow well will be installed near the suspected VOC source area (SWMU474-TW08), two permanent wells will be installed laterally from the suspected VOC source area, and one permanent well will be installed as a non-impacted well hydraulically downgradient from the suspected source area. In addition, temporary well SWMU474-TW09 will be converted to a permanent well to serve as a non-impacted well located hydraulically upgradient of the suspected source area.*



- Legend**
- ▲ Proposed Subsurface Soil Location and Deep DPT Groundwater Grab Sample Location
 - Proposed Temporary Well Location, Surface and Subsurface Soil Location
 - Proposed Temporary Well Location and Subsurface Soil Location
 - ▲ Proposed Permanent Monitoring Well and Subsurface Soil Location
 - CSI sampling location with reported groundwater exceeding criteria
 - CSI sampling location with no soil detections exceeding criteria
 - ◆ Manhole
 - Approximate Boundary of SWMU 474

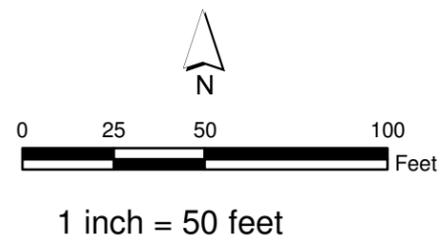


Figure 4-1
Proposed Sampling Locations
SWMU 474 RFI
MCB Camp Lejeune
North Carolina