

01.01-04/02/92-01162

(804) 445-2931

5090
1823:BCB:srw
10.2 APR 1992

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Jack Butler
North Carolina Department of Environment,
Health, and Natural Resources
Post Office Box 27687
401 Oberlin Road
Raleigh, North Carolina 27611

Re: MCB Camp Lejeune; Responses to North Carolina DEHNR
Comments on the Draft Final Site Assessment Report for
Sites 6, 48, and 69

Dear Mr. Butler:

We have received the North Carolina Department of Environment,
Health, and Natural Resources comments (letter dated February 19,
1992) to the subject draft documents. The Navy/Marine Corps
responses to these comments are enclosed.

Any questions concerning these responses should be directed to
Mr. Byron Brant at (804)-445-2931.

Sincerely,

P. A. RAKOWSKI, P.E.
Head
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

Enclosure

Copy to:
EPA Region IV (Ms. Michelle Glenn)
MCB Camp Lejeune (Mr. George Radford)
Baker Environmental (Mr. Ray Wattras)

Blind copy to:
182
1823 (BCB) (2 copies)
1812
18S
F:\admin\typeout\DSARC\NC.BCB

RESPONSE TO COMMENTS ON
THE DRAFT FINAL SITE ASSESSMENT REPORT FOR
SITES 6, 48, AND 69, MCB CAMP LEJEUNE
NORTH CAROLINA DEPARTMENT OF ENVIRONMENT, HEALTH,
AND NATURAL RESOURCES LETTER DATED FEBRUARY 19, 1992

1. On page 4-4 reference is made to the "northwest-southeast" geological cross section. The geological cross section presented in Figure 4-4, however, is shown to run north-south.

The text will be changed to reflect this correction

2. On page 5-1 concern is expressed regarding the number of laboratory contaminants found in many of the QA/QC samples. The presence of these compounds in field samples cannot be dismissed as laboratory contamination without resampling to document their absence in the site environment.

All wells within these study areas will be resampled during future investigations.

3. Table 5-2 on page 5-5 is unreadable. This table should be enlarged and reprinted.

The referenced table will be reformatted for clarity.

4. On page 5-2 a discussion is presented addressing filtered verses unfiltered samples. The following excerpt from the EPA Region IV Environmental Compliance Branch Standard Operating Procedures and Quality Assurance Manual, 1 February 1991, is presented here for your information:

4.9.5.2 Filtering - As a standard Branch policy, groundwater samples will not be filtered. However, if samples are filtered, then both filtered and non-filtered samples will be submitted for analyses. Proper well installation and development as well as proper purging techniques should be utilized to minimize the turbidity of samples. If filtered samples for metals analyses must be collected, an additional unfiltered sample will also be collected for metals analyses. Samples for organic compounds analyses shall not be filtered.

This information is acknowledged. Unfiltered samples were collected and analyzed as per EPA policy, and the results of these analyses were used for risk determination.

5. A summary of the Water Quality Standards for Freshwater Classes and Tidal Saltwater Classifications is included as an attachment to this letter. This summary should be used to revise Tables 5-3, 5-6, 6-1, 6-3, 6-8, and 6-12. The Potential Chemicals of Concern (PCOC) indicated in Tables 6-3, 6-8, and 6-12 should be re-evaluated using this summary.

Referenced tables have been changed to reflect the supplied data. These changes added only Copper as a COC at Sites 6 and 48.

6. It was noted that no groundwater monitoring has been conducted at Site 48. Although the presence of mercury is recognized in the discussion on page 5-12, it is recommended that a groundwater monitoring program be initiated at Site 48 to define the extent of possible groundwater contamination.

The Navy/Marine Corps will consider this comment when preparing future Work Plans for the site.

7. On page 5-22, the "standing water sample collected on the south side of the site" is referenced to as 69GW1. The proper designation for this sample is assumed to be 69SW1 and should be corrected.

The text has been corrected to reflect this change.

8. Section 6-1 of this Site Assessment Report was reviewed as only a chapter in the Site Assessment Report. It is assumed that a full human health and ecological risk assessment for each site, including modeling exposure concentrations to receptor populations, will be prepared and submitted for review.

Comment acknowledged. The Navy/Marine Corps will consider this comment when preparing future Work Plans for the site.