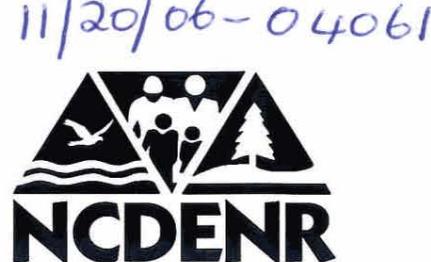


North Carolina
Department of Environment and Natural Resources

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary
Dexter R. Matthews, Director



November 20, 2006

NAVFAC Atlantic
Attn: Daniel R Hood
Code: OPCEV
NC/Caribbean IPT, EV Business Line
6506 Hampton Blvd
Norfolk, VA 23508-1273

RE: Comments on Operable Unit 10, Site 35 Draft Amended Remedial Investigation (RI) Report
Soil and Groundwater
Camp Lejeune, NC6170022580
Jacksonville, Onslow County, North Carolina

Dear Mr. Hood:

The NC Superfund Section has received and reviewed the Draft Amended RI Report for Operable Unit #10, Site 35, dated October 2006, Camp Lejeune, MCB Superfund Site. The following general comments are included for the Partnering Teams consideration. Comments from the Aquifer Protection Section of the Wilmington Regional office are also included as an **attachment** to the hard copy of this comment letter.

General Comments

Based on the information provided in Section 2.4 on pages 2-3 through 2-7 it appears that the IR program at Camp Lejeune has historically completed more than 195 soil samples or probe samples at the Site 35 area from multiple depths and completed more than 213 groundwater monitoring wells, hydropunch or DPT sampling locations in the area. If this is to be the final completed RI Report it is recommended that we include a referenced figure in the report that shows all the known locations of groundwater monitoring wells, Direct Push Technology groundwater monitoring locations and other groundwater sample location such as hydropunch locations.

This will help clarify the density of the groundwater work that has been completed in this area and will help fill in the space between the monitoring wells and DPT (Geoprobe) sample locations on the included figures shown from the more recent RI work. This may help resolve the attached comment from the Aquifer Protection Section in the Wilmington Regional office in regard to the delineation of the plume. We may want to include a

1646 Mail Service Center, Raleigh, North Carolina 27699-1646
Phone: 919-508-8400 \ FAX: 919-715-4061 \ Internet: www.enr.state.nc.us

Mr. Daniel Hood
11-20-2006
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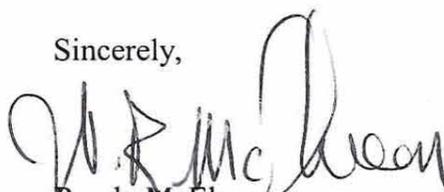
presentation and discussion of the recent monitoring well results and the boundary delineation of Site 35 during the January Partnering meeting.

It is also recommended that the a figure be included in the report that shows the areas where soil removal work was completed. We should also show the IAS trench location on one of the figures.

Based on the Natural Attenuation indicator parameters and other geochemical parameters in Section 5.2.2.3 on pages 5-6 through 5-11 and the summary on page 5-11 it appears that a combined ERD and ZVI remedy would fit site 35 well. The lower ORP that would result from the ZVI and ERD combined injection would increase the pH and possibly consume or reduce the competing sulfate concentrations and create a faster ERD toward methanogenesis. A low ORP already exists and all the other geochemical conditions exists for this process except the very low ORP that would be aided by the addition of ZVI and the low carbon source concentrations which would be provided by the ERD substrate.

If you have any questions or comments, please contact me, at (919) 508 8467 or email randy.mcelveen@ncmail.net

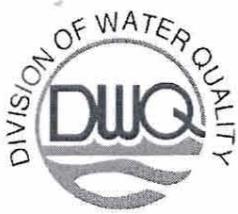
Sincerely,



Randy McElveen
Environmental Engineer
NC Superfund Section

Attachment

Cc: Dave Lown, NC Superfund Section
Bob Lowder, EMD/IR
Gena Townsend, USEPA



Michael F. Easley, Governor
 William G. Ross Jr., Secretary
 North Carolina Department of Environment and Natural Resources
 Alan W. Klimek, P.E. Director
 Division of Water Quality

November 3, 2006

Memorandum

TO: Randy McElveen, Superfund Section
 THROUGH: Charlie Stehman *CS*
 FROM: Ginny Henderson *GH*
 SUBJECT: Draft Amended Remedial Investigation
 OU 10, Site 35, Camp Geiger Fuel Farm, Incident No. 5898
 Camp Lejeune, Onslow County

Based on our review of the subject report provided by CH2M Hill, on behalf of the Department of the Navy, Naval Facilities Engineering Command, Mid-Atlantic Division; the Division of Water Quality (DWQ), Aquifer Protection Section, Wilmington Regional Office (WiRO) has the following comments to offer for the final version of the report:

- A legend should be included on Figure 3-2, including a contour interval and the name of the quad sheet.
- The deep aquifer slug test results were not discussed in Section 4.4 on page 4-6.
- On pages 5-8 and 5-9, all the electron acceptors are discussed in order of preference except for sulfate and ferric iron. The discussion for these two should be switched for consistency.
- The titles for Tables 5-2A and B are cut off on every page of the tables except the first pages.
- On page 8-1, Section 8.1, the first sentence of the first paragraph contains several typos.
- On page 8-4, DCE is misspelled in the first sentence of the fourth paragraph.
- The latest version of 2L is not cited in the references. There is a December 2005 version.
- The final issue is the delineation of the plume. The report indicates that the plume has been fully delineated and no further work is necessary. There appears to be several areas that are not adequately defined from DWQ's perspective. Data gaps of 200 feet or more are not generally acceptable for sites that APS reviews. This may not be an issue for other organizations.

If you have questions, please call me at (910) 796-7339.

cc: WiRO-APS Files

