

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



August 16, 2004

Commander Atlantic Division  
Naval Facilities Engineering Command  
6506 Hampton Blvd.  
Norfolk VA 23508-1278

Attention: Mr. Daniel Hood (NTR)  
Navy Technical Representative  
Code EV23-DH

RE: Comments on Responses to the Draft Site 86 Pilot Study Work Plan  
Operable Unit (OU) # 20, Site 86 MCB Camp Lejeune, NC  
Soil and Groundwater  
Camp Lejeune, NC6170022580  
Jacksonville, Onslow County, North Carolina

Dear Mr. Hood:

The NC Superfund Section has received and reviewed the OU #20 (Site 86) Responses to Comments on the Draft and Final Pilot Study Work Plan, dated August 2004, for the Camp Lejeune, MCB Superfund Site located in Jacksonville, NC. The following comments are offered for the Partnering Teams consideration. If you have any questions or comments please contact me at (919) 733-2801 ext. 341.

#### **General Comment**

In general the comments are well address in the responses. A few clarifications are needed or some discussion of horizontal well would be appropriate at the partnering meeting.

#### **Specific Comments**

1. The fifth bullet on the first page of the response document states that, due to the resent GeoProbe results and the silty clay lithology, vent wells will be place in this area to give preferential venting. Vent wells are not shown on any of the Figures and it was my understanding that no active or passive vent wells would be used.

1646 Mail Service Center, Raleigh, North Carolina 27699-1646  
Phone: 919-733-4996 \ FAX: 919-715-3605 \ Internet: [www.enr.state.nc.us](http://www.enr.state.nc.us)

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2. In Response to an EPA comment it was stated that a new Figure at a greater scale has been created showing the location of the 10 proposed monitoring wells. I could not locate the new Figure showing the 10 additional monitoring well locations in the **Final** Pilot Study Work Plan for Site 86. Please provide the new Figure with the proposed wells or explain why it is not located in the Final Pilot Study Work Plan.
3. It would be worth the effort just as an additional safety confirmation to check the nearby buildings and utilities using an O<sub>2</sub> LEL/UEL Meter during the first few weeks of Ozone sparging.
4. One concern that I still have is how and where to place the seal within the annular space of the horizontal well. I also made a comment on this in my resent comments on the Implementation Work Plan. I think this was one of the oversights of the horizontal well at Site 73. It is likely that the large breakthrough at the upgradient end of the horizontal well at Site 73 was the results of ineffectively sealing off the annular space. We wish to get most if not all of the ozone into the screened interval of the well to move out into the aquifer in this area.

If you have any questions or comments, please contact me, at (919) 733-2801, extension 341 or email [randy.mcelveen@ncmail.net](mailto:randy.mcelveen@ncmail.net)

Sincerely,



Randy McElveen  
Environmental Engineer  
NC Superfund Section

Cc: Dave Lown, NC Superfund Section  
Scott Williams, EMD/IR  
Gena Townsend, USEPA