

4/12/06 - 04053

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

April 12, 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 the Site 88, OU #15, Non-Time Critical Removal Report
 Source Removal/Treatment
 MCB Camp Lejeune, NC
 Soil and Groundwater
 NC6170022580
 Jacksonville, Onslow County, North Carolina

Dear Mr. Hood:

The NC Superfund Section has received and reviewed the Draft Site 88 Building 25 Source Removal Non-Time Critical Removal Action Report for Operable Unit #15. The following comments are included for the Partnering Teams consideration.

General Comment

The report seems to be in good order. It appears based on a comparison of the first year of data for Site 88 with that of the Electrical Resistance Heating (ERH) data at Site 89, that the ERH results was more effective in soil and groundwater than that of the Soil Mixing with ZVI injection at Site 88. Both sites were dealing with product level PCE, TCE and degradation products and it appears based on the limited groundwater results at site 88 that the ERH groundwater results were at a minimum one to two orders of magnitude lower than that of the Soil Mixing ZVI injection groundwater results.

Specific Comments

1. The last sentence of the 4th paragraph on page 8-3 states that the “maximum concentrations of TCE and DCE were found in column 125 at 15 ft. [below ground surface] (bgs).” By observation of the August 2005 data in Table 8-2 it is clear that the maximum concentration of TCE is located in column 143 at 20 feet bgs rather than in column 125 at 15 feet bgs. Only DCE is a maximum in column 125 at 15 feet.
2. There is no Figure 9-1 in this draft document as stated in the second paragraph on page 9-1. Please make appropriate corrections.

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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

March 13, 2006

Memorandum

TO: Randy McElveen, Superfund Section

THROUGH: Charlie Stehman 

FROM: Ginny Henderson 

SUBJECT: Draft Non-Time Critical Removal Action Report
OU 15, Site 88, Building 25
Camp Lejeune, Onslow County
Incident No. 85277

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

- On page 1-4, in Section 1.2.2, paragraph 2, sentence 1, phased should be changed to phases.
- On page 4-1, in Section 4.1, the sentence "ZVI is a strong.... many common dissolved contaminants." is repeated in the first and second paragraphs. DWQ believes it can be removed from paragraph 1 or shortened and combined with the sentence that follows it.
- On page 6-2, in Section 6.3, paragraph 1, sentence 1, contaminates should be changed to contaminants.
- On page 9-1, in Section 9.1, paragraph 5, sentence 1, probably should be changed to probable.
- In Table 1-3, DNAPL is used in the table but the notes only define NAPL. The notes should include a complete definition.
- In Table 1-5, bgs should be defined in the notes.
- In Table 8-1 and all the following tables that use the abbreviation, the note explaining the U abbreviation should qualify that the contaminant was not detected above the quantitation limit.
- In Table 8-3, NS and the unit abbreviations are not defined in the notes. They also use two different abbreviations for micrograms per liter ($\mu\text{g/L}$ and UG/L). One form should be chosen for consistency, preferably in all the tables but at least within each table.
- In Tables 8-4 and 8-5, the unit abbreviations are not explained in the notes.
- On Figure 1-1, in the legend, highway is misspelled in the limited access highway note.
- DWQ believes it would be useful to include the locations of the abandoned and destroyed wells on the Site Plan (Figure 1-2).
- DWQ believes that MW29, which was destroyed during the installation of the parking lot, should be reinstated. This well was one of the downgradient wells and would be useful in continuing to monitor the downgradient effect of the source area treatment.

If you have questions, please call me at (910) 796-7261.

cc: WiRO-GWS Files

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