

Response to Comments submitted by P. B. Gillooly of the Department of the Navy, dated March 13, 2000, to the Draft Supplemental Groundwater Investigation Report for Sites 90, 91, and 92 - Marine Corps Base Camp Lejeune, North Carolina.

General Comments:

1. This comment does not require a response.
2. This comment does not require a response.
3. A Final Supplemental Groundwater Investigation Report will not be issued, but rather, the information from this report is being included as a part of the Final Focused RI that is being prepared by Baker. The Final Focused RI will include a qualitative risk assessment due to the low number of detected contaminants and the low concentrations of those contaminants that were detected. Since the Focused RI will contain a qualitative risk assessment rather than a quantitative risk assessment, due to conditions at the sites, a Conceptual Site Model (CSM) is not necessary and therefore will not be included in the Final Focused RI.

Specific Comments:

1. This comment will be addressed under the response to comments on the Focused Remedial Investigation. However, groundwater resampling showed no toluene detections at Site 90, thus indicating that the toluene detection in sample 90-TWSB05 was more than likely a result of lab contamination as discussed in the text.
2. Available records do not detail all of the chemicals previously stored at Site 91. Records simply indicate, AOf these (4) ASTs, two were used to store kerosene, one for antifreeze and one for waste oil. ASTs were removed before Baker=s 1997 Focused RI. Adjacent support facilities for the School have been used as a petroleum, oil and lubricant area, lube-oil drum storage, equipment wash areas and as a hazardous/potentially hazardous material temporary storage area.@ as stated on page 1-3 in paragraph two of the Draft Supplemental Groundwater Investigation Report.
3. See response to General Comment #3.
4. Monitoring wells at Site 91 that had positive detections of chloroform during the focused RI or during the Supplemental Groundwater Investigation have been included as part of the Camp Lejeune Long Term Monitoring (LTM) program. Site 91 monitoring wells will be sampled on a quarterly basis under this program beginning in July 2000, until the contaminants of concern in each well decrease to below NCWQS or other appropriate standards.
5. Quality Assurance/Quality Control (QA/QC) procedures are discussed in the RI Work Plans and the Focused RI and the approved Work Plans for this site state the sampling methods that were used. The appropriate methods and USEPA protocols for sampling and analysis were followed. Any analytical results that might have been unacceptable would have been rejected during the data validation process. No analytical results were rejected.