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MCB CAMP LEJEUNE
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LETTER AND U S NAVY RESPONSE TO NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES COMMENTS TO SAMPLING AND ANALYSIS
PLAN OPERBALE UNITS 1 AND 2 (OU1) (OU2) MCB CAMP LEJEUNE NC
8/3/2012
CH2M HILL

Response to Comments

Draft UFP-SAP for the Historical Metals Evaluation at OU1 and OU2

Marine Corps Base Camp Lejeune, North Carolina

PREPARED FOR: Charity Rychak, MCIEAST-MCB CAMLEJ
Dave Cleland, NAVFAC Mid-Atlantic
Gena Townsend, EPA Region 4
Randy McElveen, NCDENR

PREPARED BY: CH2M HILL

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Introduction

The purpose of this document is to address comments on the Draft UFP-SAP – Historical Metals Evaluation at OU1 and OU2. The North Carolina Department of Environment and Natural Resources (NCDENR) Superfund Section provided the comments listed below. Responses to comments are provided in bold. A no comments letter was received May 21, 2012 from the United States Environmental Protection Agency.

NCDENR Comments (dated April 13, 2012)

1. Why would an ESD be required if the scenario in bullet 4 on Page 1 of the Executive Summary is true? Metals are already contaminants of concern (COCs) in the Record of Decision. We would only need to change the SAP analytes in the Long Term Monitoring (LTM) plan.

Per the 5-year review recommendations, ESDs may be prepared for both OUs 1 and 2 based on the metals results. If the metals detected at OUs1 or 2 are determined to be site-related, the metals COCs will be added back in to the LTM program and documented in ESDs.

2. The white paper on Low-Flow Sampling in attachment 2 does not address the issue of representative aquifer sampling when extremely low flow purging (less than 0.3 liters per minute) of medium to high permeability aquifers are present. When extremely low flow sampling of high yield wells is done, the groundwater sample is recovered only from a small interval of the monitoring well screened interval. In many cases the contaminant concentration in these samples are not representative of the aquifer. The SAP rightly recommends higher purge rates 0.5 to 1 liter per minute “for more transmissive” formations in item 10 on page 2 of the Low-Flow Groundwater Sampling SOP in Attachment 2. The higher purge rate should be used unless the water level in the well drops more than 3.6 inches (0.3 feet) as stated in item 10 of the SOP.

Agreed. The field team was instructed to purge at the highest rate achievable within the ranges outlined in the SOP and maintain stable water levels.