

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 22, 2005

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 Draft Final Close out Report OU#4 Sites 41 and 74 at MCB  
Camp Lejeune, NC  
NC6170022580  
Jacksonville, Onslow County, North Carolina

Dear Mr. Hood:

The NC Superfund Section has received and reviewed the Draft Final Closeout Report for Operable Unit (OU) #4, Sites 41 and 74, dated November 2005, at the Camp Lejeune, MCB Superfund Site located in Jacksonville, NC. The following comments are included for the Partnering Teams consideration.

### Specific Comments

Section 6.3 on page 6-1 gives a brief protectiveness summary that should summarize all the data and knowledge that we have from sampling and analysis of the groundwater since 1997. This Section 6.3 protectiveness discussion for Site 41 should be expanded to include the fact that naturally occurring lead contaminants in groundwater were well below the standards during the last 2 quarterly monitoring events and benzene was non-detect during the last monitoring event. There is no distinct plume of either lead or benzene at site 41 since out of the 14 monitoring wells in and around the approximately 1.4 acre site only monitoring well 41-GW11 consistently detected benzene and lead above the NCAC 2L Groundwater Standards.

Based on a 2002 Base Background Groundwater Study acceptable lead concentrations in background groundwater for the site from Table 7-1 is 30.9 ug/l. This is the average background concentration (1.1 to 61.7 ug/l) for the base plus 2 standard deviations which is agreed to be an acceptable concentration for lead at the base due to naturally occurring background concentrations. Out of 19 sampling events at Site 41 only 3 samples from monitoring well 41-GW11 exceeded this acceptable background concentration. These 3

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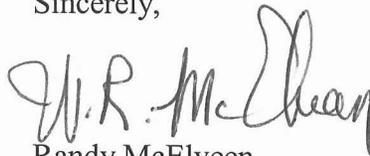
Mr. Daniel Hood  
11-22-2005  
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exceedances is likely be due to high turbidity. Analytical results from the last five monitoring events were well below the acceptable background concentration. Please evaluate the data and emphasize these details in the Final Report. We could also discuss the fact that benzene is not a COC in the ROD. We may want to show the acceptable base background concentration level for Lead on Figure 3-4 since it technically takes precedence over the 2L Standard.

If needed we can discuss this language by email or teleconference to finalize this Section of the Report. The protectiveness discussion of Site 41 is very important since we have a lot of lead detections above the 2L Standard in monitoring well 41-GW11 and we still have benzene in the groundwater at the site above the 2L Standards (only slightly above the Standard (2 ug/l)).

If you have any questions or comments, please contact me, at (919) 508 8467 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  
Bob Lowder, EMD/IR  
Gena Townsend, USEPA