

Division of Waste Management

Michael F. Easley, Governor  
William G. Ross Jr., Secretary  
Dexter R. Matthews, Director



February 13, 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 Operable Unit # 22, Site 95 Draft Site Investigation Work Plan, MCB Camp Lejeune, NC  
NC6170022580  
Jacksonville, Onslow County, North Carolina

Dear Mr. Hood:

The NC Superfund Section has received and reviewed the Draft Site Investigation Work Plan, dated February 2006 for Operable Unit (OU) #22, Site 95 at the Camp Lejeune, MCB Superfund Site. The following comments are included for the Partnering Teams consideration.

### Specific Comments

1. The first paragraph after the bullet items at the top of page 11 should be the first paragraph in Section 3.1.1 Step 1 – State the Problem. The problem needs to be stated first in this Section then the activities associated with the step.
2. As discussed in the DWQ comments, attached, we may need to split these sites up into 3 different sites at some point in order to minimize confusion.
3. The last bullet at the bottom of page 4-3 States that the purge rate will be (approximately 0.3 liter/minute or less). As we have discussed in the past the State has concerns about low flow purging below 0.2 liter/minute since this is within the micro-purge range. These low flow purge rates may be extracting groundwater from discrete intervals within only a few inches of the extraction tubing inlet. This would not be representative of the column of groundwater in the well. If we use these extremely low flow rates we could run into problems in the future. The State, the EPA or other environmental agencies could request to sample the wells at anytime. If there concentrations are inconsistent with our data we would need to justify our

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sampling strategy. This could also cause public perception problems. Please make appropriate changes.

4. The screening criteria in Section **3.1.2 Step 2 – Identify the Decision**, should include the EPA's Maximum Contaminant Levels (MCLs). This is the PA/SI phase and the contaminants of concern (COCs) have not been established. We are analyzing groundwater for TCL, TAL contaminants. The 2L Standards are not greater than all the MCL standards. Please make appropriate corrections.

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

*Attachment:*

Cc: Dave Lown, NC Superfund Section  
Bob Lowder, EMD/IR  
Gena Townsend, USEPA