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U S NAVY RESPONSES TO NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND  
NATURAL RESOURCES COMMENTS ON DRAFT TIER II SAMPLING AND ANALYSIS PLAN  
FOR REMEDIAL INVESTIGATION AT UNEXPLODED ORDNANCE SITE UXO-23 D-9 SKEET  
RANGE MCB CAMP LEJEUNE NC  
10/12/2012  
CH2M HILL

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# Response to Comments

## Draft Tier II Sampling and Analysis Plan – Expanded Site Investigation, UXO-23 D9 Skeet Range, ASR 2.82

### Marine Corps Installations East – Marine Corps Base Camp Lejeune, North Carolina

PREPARED FOR: MCIEAST-MCB CAMLEJ Partnering Team

PREPARED BY: CH2M HILL

DATE: October 12, 2012

This technical memorandum presents the responses to comments received regarding the Draft Tier II Sampling and Analysis Plan for the Expanded Site Investigation at UXO-23 (D9 Skeet Range) prepared by CH2M HILL. Comments were received from the NCDENR by email on September 18, 2012. USEPA responded via email on October 11, 2012 with no comments. Responses to each individual comment are provided below.

Per discussion during the September partnering meeting, the title of the document will be revised to Remedial Investigation. A UFP-SAP Addendum will be prepared at the completion of the Non-Time Critical Removal Action (NTCRA) to include soil investigation in the NTCRA area. Investigation in the North Area will move forward in the interim.

#### **Response to Comments – Randy McElveen/NCDENR**

**Comment #1:** In reading through the Sediment and Surface Water Sample location descriptions and locations on page 34 and 35 it was observed that Figure 7 is not consistent with these descriptions. According to Figure 7 there are 6 sediment samples in Section 1, not 5; 7 sediment samples in Section 2, not 10; 9 samples in Section 3, not 10; 6 samples in Section 4, not 10 and 3 samples in Section 5, not 15. Please make appropriate corrections in this section and throughout the Plan.

**Response:** The text correctly presents the number of samples to be collected within each section of each creek. The sediment samples presented in Figure 7 were locations marked out in the field as ideal sediment sampling locations; however, the field team did not mark every proposed sediment sampling location (a total of 66). This sediment sample location presentation was unclear in the note provided in Figure 7, and therefore the sediment sample locations chosen in the field and the note were removed from the figure. Figure 7 will now only present the 5 different sections of Bearhead creek and the 4 different sections of Beaver Dam creek, and the number of samples to be collected from each in the legend.

**Comment #2:** Item number 11 on page 2 of the Low-Flow Groundwater Sampling SOP in Appendix B is inconsistent with CH2M HILL's recent discussion of minimal hydraulic conductivity for low-flow sampling based on the EPA's SESD procedures dated October 2011. Please make corrections in item number 11 to be consistent with recent discussions and responses to comments and as we discussed in the June partnering meeting.

Response: An attachment to the SOP for Low Flow Sampling will be added. This attachment details the well volume purge method to be used should the drawdown be greater than 0.3 ft during low-flow sampling.