

Response to Comments
Draft Site Specific Work Plan Addendum for Preliminary Assessment/Site
Inspection Site UXO-14, Former Indoor Pistol Range and Gas Chamber (Rifle
Range Area) ASR #2.199 and #2.200
MCB Camp Lejeune, North Carolina

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The purpose of this document is to address comments to the Draft Preliminary Assessment/Site Inspection Site Specific Work Plan Addendum for UXO-14 Former Indoor Pistol Range and Gas Chamber, Marine Corps Base (MCB) Camp Lejeune, North Carolina. The North Carolina Department of Environment and Natural Resources (NCDENR) and the United States Environmental Protection Agency (USEPA) provided the comments listed below. Responses to comments are provided in bold type.

North Carolina Department of Environment and Natural Resources
(dated July 16, 2009)
Specific Comments

1. On Tables 3-1 and 3-2 it states that SW-846 Method 8270C will be used to analyze for the following constituents at the former gas chamber:

CN = chloroacetophenone
CS = 0-chlorobenzylidenemalonitrile

Prior to the submittal of this PA/SI Work Plan, there have been MMRP PA/SI investigations conducted at two other former gas chamber areas:

- ASR 2.204 (2nd Marine Division): A Focused Site Inspection was conducted and soil and shallow groundwater samples were analyzed for volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), metals, and tear gas constituents 2-chloroacetophenone (CN) and 2-chlorobenzalmalonitrile (CS).
- Former B-3 Gas Chamber, UXO-01: Soil samples were analyzed for explosives residues, perchlorate, total metals, and SVOCs including tear gas constituents (CN, CS, and degradation products).

Please consider whether the analysis strictly for CN and CS at UXO-14 provides adequate characterization of possible releases from the former use of this land. Possibly it would be good to include all SVOCs including CN, CS and degradation products.

Soil and groundwater samples collected from the former Gas Chamber site will be analyzed for SVOCs including CN, CS and degradation products. The PA/SI Work Plan has been revised accordingly.

2. On page 3-5 it states that total metals analysis will be run on samples from the former indoor pistol range by SW-846 EPA Method 8260B. This should be revised as Method 8260 is for Volatile Organic Chemicals.

The total metals analytical method listed on Page 3-5 has been revised to include SW-846 USEPA Method 6010B.

3. In the section which describes the ground water sampling it states that proposed temporary monitoring well locations are presented on Figure 3-2. For the 3 temporary wells which are to be installed at the former indoor pistol range area, if a potentiometric surface map is to be developed the wells should not be installed in the linear fashion depicted on this figure.

Proposed monitoring well MR14-TW-2 will be moved approximately 20 feet south of the location shown in Figure 3-2 of the Draft PA/SI Work Plan. Figure 3-2 has been revised to show the new location.

USEPA
(dated August 14, 2009)
Specific Comments

1. The Environmental Protection Agency (EPA) has completed its review of the above subject document, dated June 2009. There is only one comment associated with this submittal. The data collected should also be screened against the drinking water maximum contaminant levels (MCLs). Please add this provision to page 2-3, second bullet. With this correction the document can be finalized.

Section 2 has been revised to include screening against MCLs.