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MCB CAMP LEJEUNE
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LETTER AND THE NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL
RESOURCES COMMENTS ON THE DRAFT EXPANDED SITE INVESTIGATION REPORT
MILITARY MUNITIONS RESPONSE PROGRAM SITE UXO-02 UNNAMED EXPLOSIVE
CONTAMINATED RANGE MCB CAMP LEJEUNE NC
4/27/2012
NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES



North Carolina Department of Environment and Natural Resources
Division of Waste Management

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

April 27, 2012

NAVFAC Mid-Atlantic
Attn: Dave Cleland Code: OPQE
USMC NC IPT, EV Business Line
6506 Hampton Blvd
Norfolk, VA 23508

RE: Comments on the Draft ESI Report for MRP Site UXO-02, Unnamed Explosives Range, (ASR #2.201)
Soil, Sediment, Surface Water and Groundwater
Camp Lejeune, NC6170022580
Jacksonville, Onslow County, North Carolina

Dear Mr. Cleland:

The NC Superfund Section has received and reviewed the Expanded Site Investigation (ESI) Report for Munitions Response Program (MRP) Site UXO-02 (Includes IR69), Unnamed Explosives Range, (ASR#2.201), dated March 2012, and received for review on March 22, 2012. The following comments are offered for the Partnering Teams consideration. If you have any questions or comments please contact me at (919) 707-8341.

General Comment

The NC Superfund Section concurs with the conclusions and recommendations of this Report. As stated in the Recommendations Section 7.2, “the remaining environmental impacts to be further assessed are associated with potential risks from exposure to waste and the VOC groundwater Plume (Site 69)” [and down-gradient VOC plume]. As documented in this Report Sediment samples at IR69-SD01 had detections of Vinyl Chloride (VC).

Therefore, the surface water and sediment from this tributary should continue to be sampled, analyzed, and evaluated for VOCs and SVOCs as part of the ongoing IR Site 69 Remedy. The IR69-SD01 sample location should be included in a surface/sediment evaluation as part of the Remedial Design confirmation sampling. The tributary at IR69-SD01 is located near the end of the VC plume at Site 69 and may continue to be impacted by site related VOCs since the source of VOC contamination is not being reduced or cut-off from further impacts to the down-gradient area of the site.

The fact that QC Seed items requires the EM61-MK2 coil to pass almost directly over a seed item or for that matter a real Unexploded Ordinance, gives great concern regarding the effectiveness of the Geophysical investigation process for high explosives sites. This lack of precision is extremely important at areas like Site UXO-19, Camp Devil Dog where large quantities of high explosives were discovered. Since there were no high explosives detected or confirmed at Site UXO-02, the investigation results are sufficient for this area and make it clear that this area has no history of high explosives practice or usage.

Mr. Dave Cleland

4/27/2012

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1. Dave Lilley with the Division of Waste Management will be reviewing the Risk Screening Sections of the document for accuracy. His comments will be forwarded when they are received.

If you have any questions or comments, please contact me, at (919) 707-8341 or email to randy.mcelveen@ncdenr.gov

Sincerely,

Randy McElveen
Environmental Engineer
NC Superfund Section

Cc: Dave Lown, NC Superfund Section, Electronic only
Charity Rychak, EMD/IR
Gena Townsend, USEPA
Bryan Beck, NAVFAC