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MCB CAMP LEJEUNE
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LETTER AND THE U S NAVY RESPONSE TO THE NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES AND THE U S EPA REGION II COMMENTS
ON THE DRAFT EXPANDED SITE INVESTIGATION REPORT MILITARY MUNITIONS
RESPONSE PROGRAM SITE UXO-26 FORMER B3 GAS CHAMBE

10/24/2012
CH2M HILL

**Response to Comments
Draft ESI Report Military Munitions Response Program Site UXO-26 (ASR #2.79) –
Former B-3 Gas Chamber
Marine Corps Installations East –Marine Corps Base Camp Lejeune (MCIEAST-
MCB CAMLEJ), North Carolina**

PREPARED FOR: Charity Rychak, MCIEAST/MCB CAMLEJ
Dave Cleland, NAVFAC Mid-Atlantic
Gena Townsend, EPA Region 4
Marti Morgan, NCDENR
PREPARED BY: CH2M HILL
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Introduction

The purpose of this document is to address comments on the Draft ESI Report for Site UXO-26 (ASR #2.79) – Former B-3 Gas Chamber. The North Carolina Department of Environment and Natural Resources (NCDENR) and United States Environmental Protection Agency provided the comments listed below. The comments and response to the comments are presented below. The response is provided in bold following all the comments.

**North Carolina Department of Environment and Natural Resources Comments
(dated September 6, 2012)**

1. NCDENR concurs with the recommendations to expand the investigation to the south and east of Area 2.79b, expanding approximately 500 ft. to the south and 150 feet to the east except where bounded by Seventh Street.
2. Figure 4-1 shows the location of the MEC and MPPEH found during the intrusive investigation. As seen from that figure, it looks important to included, in the next phase of investigation, the southeastern portion of Area 2.79b which was not accessible due to the presence of standing water during the previous investigation. As such NCDENR concurs with the recommendation to conduct the next phase of investigation at a time when this area of the site is dry.
3. Because so much MEC/MPPEH was found during this investigation in area 2.79b, as a result of 12% DGM of the site, it seems there is reason to further investigate this area to provide 100% coverage as funding is available rather than waiting for a MILCON project to precipitate that.
4. NCDENR concurs that no additional MR investigation of UXO-26 areas 2.79a and 2.79c are warranted based on this investigation.
5. NCDENR concurs that no additional investigation of environmental contamination is necessary unless warranted as a result of future MEC/MPPEH discoveries and possible environmental issues associated with those.

United States Environmental Protection Agency Comments
(dated September 11, 2012)

General Comments

The Environmental Protection Agency (EPA) has completed its review of the above subject document, dated August 2012. EPA agrees with the recommendation for additional DGM and intrusive investigations to define the extent of MEC/MPPEH to the south and east. Additionally, areas that contained standing water should also be investigated. Based on the MEC/MPPEH identified, this area (including the standing water locations) should undergo a 100% DGM investigation. EPA also supports the recommendation of no further investigation in the #2.79a and #2.79c areas.

Response to comments

Since completion of the ESI activities and NCDENR and EPA review of the draft ESI report, Base Range Control identified the area encompassing ASR #2.79b to be re-opened. As discussed during the September 2012 Partnering Meeting, recommendations at ASR #2.79b will be presented in the ESI based on the following two potential scenarios:

- **If the area is re-opened, it will fall under the responsibility and management of Range Control. However, MEC clearance activities are recommended to minimize explosive risks.**
- **If the area is not re-opened, additional actions will be conducted under the MMRP. Existing warning signs will be maintained and a surface sweep for MEC/MPPEH will be considered to minimize explosive risks. A Remedial Investigation will also be conducted to further define the nature and extent of MEC/MPPEH. Based on the MEC/MPPEH discovered and the presumed target areas identified, the area recommended for further investigation extends approximately 500 ft south and 100 ft east of the current boundary to account for potential overshoot.**