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LETTER AND THE NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL
RESOURCES ADDITIONAL COMMENTS ON THE DRAFT PROPOSED REMEDIAL ACTION
PLAN UNEXPLODED ORDNANCE 19 (UXO-19) CAMP DEVIL DOG MCB CAMP LEJEUNE

NC

11/04/2014

NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES



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

Pat McCrory
Governor

Dexter R. Matthews
Director

John E. Skvarla, III
Secretary

November 04, 2014

Mr. Bryan Beck
NAVFAC Mid-Atlantic
Code: OPCEV
NC/Caribbean IPT, EV Business Line
6506 Hampton Blvd
Norfolk, VA 23508-1273

RE: Additional Comments [2] on the Draft Proposed Remedial Action Plan (PRAP), UXO-19, Camp Devil Dog, located at Camp Lejeune, NC
RCRA Permit Number NC6170022580
MCB Camp Lejeune
Jacksonville, Onslow County, North Carolina

Dear Bryan:

In response to Pattie's email below, I agree in general that all sites are different and should be ranked based on specifics. However, the Comparison of Alternatives Table assumes No Action is No Action.

Please consider this an additional comment on the PRAP. Regardless of the final Ranking we give the No Action and LUCs alternatives for Short-Term-Effectiveness (STE), we need to include a footnote in the Comparison of Alternatives Table, of the PRAP, that clearly states that 100% DGM and 100% Intrusive was completed in undeveloped areas of the Site. This is what makes our LUCs alternative possible at Site UXO-19 and should be included as a footnote in the subject Table. I know that the previous DGM and Intrusive investigation work is well documented in the RI and in the PRAP but a footnote should be included in the Comparison of Alternatives Table of the PRAP as well. What we actually have is a No Further Action Alternative rather than a No Action alternative at Site UXO-19.

However, with that said, I still cannot agree to moderate ranking for No Action STE at a Site where wide spread and large numbers of High Explosives (447 MEC and 50,771 MPPEH) were encountered (others I talked with agree). The GPM and Intrusive Investigation work was not completed in the developed areas of the Site.

As I have agreed, it is reasonable to have a LUCs alternative at UXO-19 but its effectiveness is only moderate not high and No Action should never be considered at a site similar to Site UXO-19 and at the best should be the lowest ranking for STE in the Comparison of Alternatives Table with a footnote discussing its relevance, as I discussed in my last comment letter. This is the general statement that I am making regarding this issue. Sites with High Explosives should have a low ranking in general for No Action STE.

-----Original Message-----

From: Vanture CIV Patricia S [mailto:patricia.vanture@usmc.mil]

Sent: Thursday, December 04, 2014 3:43 PM

To: Mcelveen, Randy

Cc: Lown, David; Hartzell, Beth; Beck, Bryan K CIV NAVFAC MIDLANT, IPTMC; Delaney CIV Charity R; Townsend, Gena; Cleland, David T CIV NAVFAC MIDLANT, IPTMC; Kimberly.Henderson@CH2M.com; Matt.Louth@CH2M.com

Subject: RE: Info from ROD guidance on evaluating Short Term Effectiveness

Randy;

Please look at the RI/FS for UXO-19. Your attached text is written in generalities about relative risk to groups of people i.e. trained HAZWOPER folks vs. marines. The UXO-19 RI/FS discusses the risks to people who have access to the site. In this case the STE for No Action was deemed moderate while the LUC alternative was ranked high. Although in Partnering we talked about STE in generalities, the RI/FS is specific. Note; the risk to everyone who has site access including marines had been reduced significantly by the 100 % UXO removal in the top 2 feet of soil so that must be taken into consideration when evaluating the remedial alternatives.

I disagree with applying assumptions about a site to analyze the criteria in lieu of applying site knowledge.

Patti Vanture, P.E.
Environmental Engineer
G-F/EMD/EQB
12 Post Lane
Camp Lejeune, NC 28547

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

Sincerely,

Randy McElveen
Environmental Engineer
NC Superfund Section

Cc: Dave Lown, NC Superfund Section, Electronic only
Charity Delaney, EMD/IR
Dave Cleland, NAVFAC
Gena Townsend, EPA Region IV