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U S NAVY RESPONSE U S EPA REGION IV AND THE NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES COMMENTS ON THE DRAFT FIVE YEAR REVIEW MCB CAMP LEJEUNE NC (PUBLIC DOCUMENT)
06/23/2015
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Response to Comments
Draft Five Year Review
Marine Corps Installations East – Marine Corps Base Camp Lejeune
North Carolina

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Introduction

The purpose of this document is to address EPA Region 4 and NCDENR comments on the Draft CERCLA Five-Year Review for MCIEAST-MCB CAMLEJ. The responses to comments are provided in bold.

EPA Region 4 Comments
(dated May 27, 2015)

1. Table ES-1: The Milestone Dates (for the Recommendations) are tracked in SEMS (EPA's tracking system) by month/day/year. Therefore, please revise the tables to include this format throughout the report. For example:

   Collect groundwater samples for 1,4-dioxane to evaluate presence/absence (9-30-2017).

   This change has been made.

2. Acronyms and Abbreviations: Please include the following Acronyms and when appropriate define within the report: AFFF, RI, PRAP and RIP.

   These acronyms were added.

3. Figure 1-2: This figure is confusing. If there is no current knowledge about the sites and how they connect to the operable units, it will be difficult in some instances to understand. For example, there would be confusion identifying OU10, OU6 and OU16 sites. Suggest only showing the site locations on this figure.

   This figure was updated to only include the site locations and the OU is listed after the site name.

4. Section 3.1: Need to add the date for Site 24 NFA. The text says Site 24 is not included in this FYR, however, it is mentioned throughout the text. It may be more appropriate to call it "remedial action complete" instead of NFA. Site 24 was in the remediation phase from 1994 until 2001.

   The statement about Site 24 being NFA was removed from the introductory paragraph and information regarding the LTM program at Site 24 was added into the text. To document remedy completion, a RACR is recommended in this FYR.

5. Section 3.5.2: Why is this information included in a CERCLA 5 YR Review that is evaluating the effectiveness of the remedies that were presented in the ROD? The information as presented gives the impression that this is included in the CERCLA program and if any questions or comments arise, the IRP will have the answers.

   If the intent is to identify the actions that resulted in the Base installing a vapor mitigation system, then information can be summarized in a couple of general sentences. (see example summary below):

   Multiple remediation systems have been installed at the HPFF under the UST program to remove the petroleum based contamination. Due to the nature of the remediation systems design and reports of vapors in Building 1005 the Navy conducted a Base wide ...

   The HPFF activities in context to the vapor intrusion activities at Site 78 was summarized as suggested. All other references to UST program-related activities were removed from the CERCLA FYR.

6. Section 3.5.2: Instead of "water table" use the approximate or average depth of the water table. It would read: (approximately 6 feet to 44 feet bgs).

   This change has been made.

7. Table 3-4: Should include the results of the HHRS. Is there a risk? The text states the recommendation but does not explain the risk evaluation result.

   The HHRS results indicated a potential risk to human health from metals in surficial groundwater. This information was added.

8. Table 3-8: The milestone date should be earlier than 2020 to revise RAOs for VI. All RAOs identified in this 5 YR Review can be revised at one time by using an ESD. Suggest 2016 - 2017 time frame.

   The milestone date to revise RAOs for VI was changed to 6/30/2016.

9. Table 4-7: These items can be completed as one event by completing an ESD. This master ESD can be used for all OUs that will need updated RAOs and LUCs.

   The table and text were revised throughout to reflect completion of a master ESD.

10. Section 15.2.4: Spelling: "sero" should be "zero"

    This error was fixed.

11. Section 15.4.2: Should this be downgradient groundwater? Upgradient groundwater has not passed through the PRB.

    This should be upgradient groundwater because this paragraph is describing data that will be used to determine whether or not to replenish the PRB.

    The paragraph has been updated to clarify and reads as follows:

    PRB effectiveness is evaluated quarterly by comparing COC concentrations and geochemical parameters to baseline conditions. Replenishment options will be considered if COC concentrations in upgradient groundwater continue to exceed clean up levels (i.e., groundwater that will be treated by the PRB), concentrations in downgradient groundwater begin to increase or exceed cleanup levels, conditions in the PRB are no longer reducing, and/or TOC within the PRB has been

depleted. It is no longer necessary for the PRB to be replenished when concentrations of COCs are detected in PRB performance monitoring wells below the cleanup levels for four consecutive sampling events.

12. Section 15.4.3: Why is this information included in the CERCLA 5 YR Review? It is not clear of the relevance to the chlorinated plume. If the UST data was evaluated to determine if contaminants from the site would impact the chlorinated contaminant plume, it should be stated. If this is not the rationale, suggest removing this information from this document. It appears as if the site UST NFA determination is equivalent to a CERCLA NFA.

    This UST program information was removed from this report.

13. Section 16.4.3: Same as comment for Site 93. Why is this information included in the CERCLA 5 YR Review? It is not clear of the relevance to the CERCLA site discussion. It appears as if the site UST NFA determination is equivalent to a CERCLA NFA or the CERCLA process can effectively make a final determination for a UST site.

    This UST program information was removed from this report.

14. Section 17.4.3: Same as earlier comments on the UST discussions. Why is this information included in a CERCLA 5 YR Review that is evaluating the effectiveness of the remedies that were presented in the ROD? The information as presented gives the impression that this is included in the CERCLA program and if any questions or comments arise, the IRP will have the answers.

    This UST program information was removed from this report.

15. Section 18.5.2: Same as earlier comments on the USTs. Why is this information included in a CERCLA 5 YR Review that is evaluating the effectiveness of the remedies that were presented in the ROD? The information as presented gives the impression that this is included in the CERCLA program and if any questions or comments arise, the IRP will have the answers.

    This UST program information was removed from this report.

NCDENR Comments
(dated 6/9/2015)

1. The units of Groundwater in Table 3-1 should be micrograms per liter rather than milligrams per liter. The soil numbers and units are suspect as well. Make appropriate corrections for the final report.

    This change has been made.

2. Spelling error. Change the word sero to zero in the fifth bullet on page 15-3.

    This change has been made.

3. Should we include a statement or paragraph about removal follow-up of PCBs at Site 84 when the utility easement lease comes up for renewal. See Section 16.6 on page 16-4.

    Based on the schedule for lease renewal (2026), the 2020 FYR will include recommendations related to removal of PCBs. However, the following statement is included in future land use

discussion in Section 16.2.2: "However, when the utility corridor lease agreements are scheduled for renewal in 2026, the companies with utilities within the PCB AOC, where intrusive or access controls are required, will be notified of the contaminated area and given the option to either properly excavate and dispose of PCB-contaminated soil and PCB waste soil or relocate their utilities outside of the PCB AOC."

4. It is recommended that we use PPM units mg/kg in Table 16-1 rather than PPB units ug/kg. This is the only Site that does not have groundwater contamination.

   Table 16-1 has been updated to mg/kg instead of µg/kg.