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MCB CAMP LEJUENE
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LETTER AND NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL
RESOURCES COMMENTS ON THE DRAFT RECORD OF DECISION OU 25, SITE UXO-19
CAMP DEVIL DOG MCB CAMP LEJEUNE NC
07/24/2015
NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES



North Carolina Department of Environment and Natural Resources

Pat McCrory
Governor

Donald R. van der Vaart
Secretary

July 24, 2015

David T. Cleland, P.G.
NAVFAC MID-ATLANTIC
Marine Corps IPT, Code OPQE3
9324 Virginia Avenue
Norfolk, VA 23511-3095

RE: Comments on the Draft Record of Decision (ROD) for Site UXO-19, Camp Devil Dog located at Camp Lejeune, NC
NC6170022580
MCB Camp Lejeune
Jacksonville, Onslow County, North Carolina

Dear Mr. Cleland:

The NC Superfund Section has received and reviewed the Draft Record of Decision (ROD) for Site UXO-19, Camp Devil Dog, located at Camp Lejeune in Jacksonville, NC dated July 2015 and received for review on July 13, 2015. The following comments are offered for the partnering team's consideration. If you have any questions or comments please contact me at (919) 707-8341 or email randy.mcelveen@ncdenr.gov.

Comments

1. Section 1.1, Selected Remedy, and Section 1.2 makes frequent reference to MMRP investigations. Please provide a reference or footnote or more details about the MMRP investigations to include the fact that a Preliminary Assessment/Site Investigation (PA/SI) and an Expanded Site Investigation (ESI) were completed and documented in the Remedial Investigation (RI).
2. State acceptance as discussed under the section on Modifying Criteria, on page 2-21, should change the phrase ". . . its final concurrence . . ." to "their final concurrence".
3. The Cost-effectiveness category of Section 2.10.4, Statutory Determinations, on Page 2-23; should include other details about the LUCs remedy and **should include** a statement regarding the fact that the effectiveness will not be significantly or cost proportionally improved by implementing active remedies, such as alternatives 3 and 4, since the greatest risk of detonating UXO is in the top 18 inches of the site where DGM and intrusive investigation and UXO removal or destruction were completed during the PA/SI and ESI using best available technology to the maximum extent practicable.
4. One additional issue of concern is that the Military Operations on Urban Terrain (MOUT) area was removed from the final site boundary and will not be included in the LUCs area for the site. I know we have discussed this before but I wanted to bring this issue up one last time before we finalize this ROD. Is this the decision that the Base and the Navy want to support in this ROD? I know the MOUT was included in the removal work documented in the RI (See Figure 2-2 of the RI/FS Report). However, The MOUT had the greatest density of mortars and grenades anywhere on the site. So, the MOUT area should be a lot safer than it was but construction or digging in the area could cause

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a detonation of UXO and without LUCs we have no controls that would prevent construction and digging for any reason. I will support the team's decision but this does cause me some concern. This decision is primarily for the base to make since this is still an active range.

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 Rychak, EMD/IR
Dave Cleland, NAVFAC
Gena Townsend, EPA Region IV